NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEF June 2018 Work Program
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CLIMATE CHANGE

1. Global (Cote d’Ivoire, Ghana, Kenya, St. Lucia, Moldova, Madagascar, Mongolia, Mauritius, Niue, Qatar, Saudi Arabia, Solomon Islands, Vietnam): Umbrella Program for Preparation of National Communications and Biennial Update Reports to the UNFCCC (UNEP) (GEF Financing: $ 7,383,040) GEF ID = 10019

✓ Germany’s Comments

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

Germany agrees that the project pursues an important objective of supporting developing countries, among them several Least Developed Countries (LDCs) and Small Island Developing States (SIDS) in the preparation of their National Communications (NCs) and Biennial Update Reports (BURs), which contribute to enhancing transparency of action and support under the Paris Agreement. Germany also welcomes the vast regional coverage of the proposed programme. At the same time, Germany has several important comments that need to be addressed before the project proposal can be finalized.

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

- Countries that are going to participate in the Umbrella Programme differ substantially in terms of national capacities, existing institutional arrangements and experience with regard to the preparation of NCs and BURs. While e.g. the Climate Change Office of Moldova has been fully responsible for the preparation of NCs and BURs since 2004, other countries like Niue, Kenya or Qatar have had less experience of such kind. While the project description emphasises that no “one-size fits all”, this is not fully reflected in Table 2 illustrating the requested GEF funding for every country. The calculation rather shows “standard” funding sums requested for the preparation of an NC, a BUR, or a combination of both. Against the background of substantially different capacities, Germany highly recommends to review the current approach and consider alternative distribution of the resources, which would be more tailored to the actual needs of each participating country. Cutting the resources in some cases while increasing them in other cases may appear to be necessary.

- As an extension of the previous comment, while the proposal highlights that the project will deliver more enhanced support to LDCs and SIDS, Germany would appreciate more clarity in the section on page 12 regarding the major differences
between the envisaged support for the LDCs and SIDS as compared to other participating countries. Moreover, specifying the volume of expected co-financing from LDCs and SIDS as compared to other participating countries would be helpful.

- Germany welcomes Component 3 “National stakeholders’ involvement and institutional arrangements for preparation of subsequent NC and BUR” as it is essential to sustain the efforts made during the project implementation for the long-term perspective. However, the outcomes of this component could further be strengthened to include the long-term financial arrangements/ strategies to secure domestic and international finance to support NC and BUR preparation in the future; concrete work plans for the preparation of the subsequent reports; and interministerial coordination arrangements.

- While the proposal mentions some ways in which the outcomes may be replicated, other useful approaches to consider could include e.g. exchanges between participating countries and their respective regional partners, which could be organised to speed up the replication processes at the regional level. Data collection, definitions, methodologies and assumptions that are to be documented during the project can be shared during such exchanges.

- Furthermore, Component 2 “Preparation of National Communications and Biennial Update Reports” foresees that after the inception workshop, the project coordinator will be expected to finalise the workplan and begin with the subcontracting and hiring experts who will prepare various components of the NCs and BURs reports. Germany requests to provide more details regarding what kind of experts are implied and what would the selection process look like.

- On page 16, the proposal mentions that Executing Agencies will be encouraged to actively involve other institutions in national reporting. Germany requests to specify the types of institutions that are meant and to provide an explanation of whether the inclusion of additional bodies is not going to lead to overcomplicated coordination mechanisms.

- Finally, the proposal mentions conformity with the GEF-6 strategic focal area on climate change mitigation, and the objective 3 on fostering enabling conditions to mainstream mitigation concerns into sustainable development strategies. In this respect, Germany would appreciate it if more information could be provided on the contribution of the project to mainstreaming mitigation concerns into sustainable development strategies.

✔ **Norwegian-Danish’s Comments**

- **Country selection:** The umbrella program will take place in 13 selected countries. However, the Project Identification Form (PIF) does not present an analysis as to why these 13 countries have been selected. The 13 countries have completed preparation of their current NCs and BURs (where applicable) and a few selected Parties will be submitting their current reports within the first quarter of 2018. However, apart from this, these 13 countries are very different, and the document does not discuss challenges related to different country contexts.
• **Implementation in countries:** The document does not go into detail about the implementation modalities in the countries, but states that this will be discussed during the first inception workshop in countries. Given that UN Environment fundamentally is a global program with limited country presence, it would have been useful that the PIF to a larger extent could inform about implementation modalities that are foreseen and how UN Environment will assure progress on the ground in countries.

• **Differentiated approach and stocktaking needed in countries:** The PIF states that the umbrella program approach presents multiple benefits compared to preparation of thirteen 13 single country enabling activities requests submitted to the GEF, and that this approach streamlines project development, however countries have very different point of departures and baselines. This is not discussed in the document. The PIF describes that a national stocking exercise for subsequent NCs and BURs will happen after they complete their NCs and BURs under Component II of the project, however it seems that such a stocktaking would also be extremely useful at the beginning of the project, as one of the first steps in the inception phase. This would be important in order to establish the baseline and avoid a “one size fits all” project implementation.

• **Sustainability:** High turn over of staff in countries is described as a considerable risk. The PIF describes that countries will be encouraged to set up permanent and adequately staffed climate change offices to ensure sustainability of NCs and BUR processes and to establish robust institutional arrangements. This seems to be a key challenge, how does the project entail to work on this? Furthermore, how will the program ensure that the creation of project groups and possibly parallel structures that are productive in the short term, do not undermine the national ownership and institutions in the longer term?

• **Stakeholder engagement:** It is very positive that «participating countries will be guided to undertake a comprehensive stakeholder’s analysis and mapping and include this information in the Project Implementation Plans”. The integration of women’s empowerment and gender concerns seems to be solid.

• **Coordination between initiatives:** Given the handful of transparency initiatives at the global level, it would be useful with a more comprehensive analysis of how this program complements other programs on this topic. This would be important in order to ensure that there is no overlap or duplication. An overview of how UN Environment/other initiatives have been involved in the selected countries would also have been useful.

• **Knowledge management and south-south learning:** The knowledge management section is very general, and includes “setting up websites” etc. It is important to ensure a global knowledge management strategy, for transparency reasons and also to enable south-south learning. The application further states that UN Environment will encourage south-south cooperation and peer support by linking up country teams to exchange data and information, tools and methodologies, lessons learnt and good practices. Seeing that the PIF does not include a detailed budget or description of activities related to this, how will this be done?
✓ **U. S’s Comments**

- In the next version of the PIF, please ensure that the indicators address all project objectives, especially in relation to increased human and institutional capacity to prepare the NCs and BURs.
- We request that the project document note any other donors providing technical assistance in improving institutional capacity to improve GHG inventories in/to these countries.

2. **Equatorial Guinea: Promoting Community-based Forestry for Climate Change Mitigation and Sustainable Livelihoods in Equatorial Guinea: (FAO) (S$ 5,329,455) GEF ID = 10034**

✓ **Germany’s Comments**

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

Germany welcomes the project on community-based forestry in Equatorial Guinea and appreciates that the project document addresses the Secretariat Comments. In accordance with the Secretariat’s recommendations for the CEO endorsement stage, Germany has the following comments that should be addressed:

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

- The information in the proposal regarding innovation, sustainability and the potential for scaling up has been revised in the PIF, but should be further elaborated in the final project proposal, demonstrating clearly how the intended sustainability goals will be reached.
- Taking note of the clarifications made regarding the risk of lacking or weak law enforcement capacity, Germany agrees with the Secretariat that this aspect shall be included and further elaborated in the final project proposal.
- Germany appreciates the project’s target contributions to global environmental benefits. However, the proposal will benefit from a more detailed documentation of the applied methodology and the assumptions made for the calculation of the global environmental benefits.

✓ **Norwegian-Danish’s Comments**

- It is a bit unclear whether the 1 million USD expected from CAFI refers to the existing grant of USD 1 million which was disbursed in 2016 to contribute to the national REDD+ strategy and investment plan, with FAO as recipient agency. For now, the national REDD+ strategy and investment plan are still being developed. No further CAFI grant to EG has been planned. However, it is correct that the drivers of deforestation study on EG to which the proposal refers several times has also been funded by this CAFI grant. On p. 17 the CAFI contribution of 1 million
USD towards the baseline on legal and policy framework refers to the national REDD+ strategy and investment plan and in this case to the fund already disbursed by CAFI, which is fine. It is also good that the program is to be coordinated with and build upon the FLEGT program in EG.

- The application also refers to an “ongoing” CBFF grant to COMIFAC for a regional project on non-timber forest products for communities to provide alternative income including in EG, by strengthening community enterprises in the field of non timber forest products (NTFP). For information, this project should have closed by 2018, so it is somewhat strange that it is referred to as ongoing. However it is encouraging that the program is to capitalize on the experiences of the CBFF project for baseline information from this project’s two pilot sites in EG. We would like to suggest that the actual government contribution be followed up closely given the challenging governance context. The financial viability and available markets for the NTFPs to be collected and sold by the community enterprises might also be questioned.

- The project itself as presented by FAO appears to be well designed and knowledge based, including the participatory study on drivers of deforestation funded by CAFI. The project description is technically strong, but one weakness is that it does not adequately refer to the risk represented by the challenging governance situation in EG and related risks to project results and sustainability.

**U.S.’s Comments**

- We understand that no direct removal of forested areas in tropical primary forests is foreseen, however since the project will assist forest entrepreneurs in these tentative pilot sites to develop income-generating tree/forest product enterprises, it is important to ensure all aspects of the operation avoid any activities or locations that could be determined to have Category-A implications (i.e. those deemed to have significant risk to people or the environment, or that trigger a U.S. legislative mandate).

- USAID and USFS experience elsewhere in the Congo Basin region over more than 20 years highlights significant challenges to sustainable land use management and forest zoning, given competing and often uncoordinated sectoral priorities and the difficulties of harmonizing national, provincial, and local land use priorities. The project description notes that these risks will be addressed through ongoing communications with the existing Inter-ministerial Steering Committee for preparation of the REDD+ National Investment Plan, which may or may not be sufficient. The United States strongly encourages the GEF and the implementing Agency to coordinate any efforts in Equatorial Guinea with the U.S. Embassy and UNDP, and that GEF and FAO program managers consult with USAID/ Central Africa Regional Program for the Environment (CARPE) and USFS/International Programs (IP) officials in the region during project design and implementation. They have extensive and long-term experience in the region, and the ability to share lessons learned from other GEF projects in the region.

- The PIF lacks a sufficient amount of information regarding how the eight
community forest management plans and associated business models will be replicated elsewhere throughout the country. Please ensure that this information is expanded in the next version of the document.

- The amount of financing allocated to dissemination of best practice (Outcome 4.3) seems modest. Please consider increasing that allocation, to help ensure project experience is meaningfully shared and replicated.

- Disruptions or shortfalls in expected co-financing from CAFI and FLEGT programs could significantly undermine the project, and such issues have occurred in other projects in the Congo Basin region. Likewise, shortfalls in government co-financing for the set-up of the rural technical extension service would undermine project objectives given the critical importance of that institutional modality for achieving community benefits. Please ensure that these risks are mitigated, and that such activities are included in the next version of this document.


   ✓ **France’s Comments**

   - Here is a project which is almost composed of Technical Assistance only. There is a component with equipment supply but not a lot of details are provided (my understanding is that it includes feasibility, design, assessment even if a pilot is mentioned).

   - As a reminder, Nauru is an island with a surface area of 21 km² (equivalent to a fifth of Paris which is 105 km²), 10,000 inhabitants (the third smallest country in the world), and 35 GWh of power consumption a year. This power is generated mainly though diesel-oil firing. Which means that Nauru could be an interesting case study for climate-friendly issues at the level of the entire island. For that reason we support this project even if there is too much TA. But we recommend that, in the project, the electricity grid management issue should be further developed (including the management of an energy mix which would include an important part of intermittent renewable energy production), under a “Smart Grid” perspective, together with the Demand-Side Management issue. The latter is important in view of non-energy efficient equipment and behavior inherited from the period 1970-1990.

   - Finally, more information should be provided in the final project document on Investment activities which will be financed by NUC and on the way they will be articulated with the GEF supported activities.

   *Opinion: Favorable provided that the above comments are taken into account*

   ✓ **Germany’s Comments**

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

   - 6
Germany welcomes the project proposal, which aims to increase the application of renewable energy and energy efficiency technologies in Nauru. To date, it is unlikely that Nauru will achieve its 2020 target of 50% grid electricity generation from renewables. The project can be a valuable trigger to advance the implementation of Nauru’s Energy Roadmap. The approach taken by the project is promising as it seeks to address institutional, knowledge, technical, financial and policy barriers to the development of renewable energy and energy efficiency measures. Moreover, the project may generate co-benefits for SIDS with similar circumstances as Nauru.

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

- Although the project proposal elaborates on financial barriers, the actions proposed do not provide a comprehensive approach to remove identified barriers. Especially, the proposal does not conceive the effective mobilisation of private climate finance sufficiently. Germany suggests clearly identifying potential national and international partners from the private and financial sector for project implementation. After all, a stronger inclusion of non-governmental actors could add valuable input to overcome the identified challenges.

- The project demonstrates potential for scale-up and market transformation; yet this requires engagement of a broader set of actors. Hence, to speed up the transition process, a stronger focus on co-operation with international stakeholders should be given consideration in the project implementation process. The respective roles of potential partners and institutions should be outlined. For example, the NDC Pacific Regional Hub provides an excellent opportunity to exchange with other Pacific countries on issues related to technology application and capacity building.

✔ U. S’s Comments

- The U.S. encourages the project team to consult and involve the Pacific Center for Renewable Energy and Energy Efficiency (PCREEE) and the Pacific Power Association (PPA) in planning and implementation of this project. The involvement of both groups is likely to expand capacity and contribute to effective replication and project scale-up.

INTERNATIONAL WATERS


✔ Germany’s Comments

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

Germany welcomes this project proposal, as it promotes transboundary water management to address severe impacts of climate change in a particularly vulnerable region.
Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The project focusses on transboundary water systems and involves mainly national and sub-national stakeholders. Germany encourages strongly to include more civil society organisations, local business councils or entrepreneurs. Especially for Bhutan, no non-governmental stakeholders are named in the project justification. IW-1 Program 1 particularly foresees the involvement of women water users, which is missing from the project justification.

- Explain how climate projections and the TDAs-SAPs will feed into National Adaptation Planning processes. Although, NAPs are part of Outcome 1.1 they are neither included in further outputs nor mentioned in the project outline. With the project’s main objective to enhance resilience to climate change, cooperation between water and climate departments would be crucial.

- Indicative co-financing is USD 50,000,000. Germany would welcome a more in-depth explanation on how the co-financing will be shared between the Governments of Bhutan and India and how this financing will support the project, especially with respect to Component 3.

✔️ U.S.’s Comments

- We would appreciate more explicit detail in the PIF to support the assumption that strengthened institutional arrangements and capacities will ensure sustained project activities.

- We would like more clarity on whether indigenous and local communities will serve as collaborators on these projects, or to what extent their knowledge may be integrated into published material.

- We would like more clarity on how the project will be sustained after the GEF grant concludes, and specifically what measures are in place to ensure the long-term persistence of the regional coordination framework (in addition to the institutional arrangements, as mentioned in comment 1 above).

- We would like more clarity on how this river basin management approach differs substantively from other similar river basin management plans with varying degrees of success in northeastern India (e.g. in Sikkim and West Bengal).

- We would like clarity on why ICIMOD is listed as a nodal, intergovernmental organization that is working on transboundary programs in the Eastern Himalayas, but is not listed as a collaborator.

- We look forward to more explicit detail in the final project document for CEO Endorsement on how the GEF project will interact with existing national dam management and legal processes.

✓ Germany’s Comments

Germany approves the following PIFs in the work program but asks that the following comments are taken into account: Germany appreciates the detailed PIF addressing transboundary water management in the Volta River Basin.

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

• Germany remarks that the indicative Focal Areas in Table A, namely, IW1-1 and IW2-3 are not consistent with the Focal Areas stated in the project justification, which are IW2-3+4 and IW3-7. Although, the project addresses some aspects of IW2-4 (WEF-Nexus) and IW3-7 (sustainable fisheries), Germany evaluates that the presented framework corresponds most to IW1-1 (transboundary water management) and IW2-3 (management of surface and groundwater resources).

✓ U. S’s Comments

• In response to a previous question posed by the United States government (“There does not seem to be a project-level framework for Multilateral Environmental Agreement (MEA) reporting, is that accurate?”), part of the agency response stated “Finally, the project could also support the countries (coordinated by VBA) with SDG-reporting.” We would like both the agency and the GEF to confirm that no project money will be spent on SDG reporting within this project, as the GEF is the financial mechanism of the MEAs, and not the SDGs.

• We would appreciate further information on how the project will support reporting to the relevant GEF MEAs (e.g. CBD, UNFCCC, UNCCD) by the member states as coordinated by the Volta Basin Authority.

LAND DEGRADATION


✓ Germany’s Comments

Germany approves the following PIF in the work program but requests 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 project explicitly relates to the objectives of UNCCD and will be a significant
contribution to their implementation at country level. Therefore, the full proposal should describe how the proposed activities link to the land degradation neutrality (LDN) process in Lesotho and ensure synergies with the LDN conceptual framework as well as the national LDN target setting and monitoring process:

- Under the Baseline Scenario, consider existing LDN commitments in the context of the UNCCD Target Setting Programme
- Under Output 1.1 - Degradation Assessment, consider the LDN indicators and monitoring tools offered by UNCCD;

The full proposal should further detail how activities will be coordinated with the upcoming EU/GIZ support for a national framework for Integrated Catchment Management in Lesotho. Germany also supports the recommendations provided by STAP.

PROGRAMATIC APPROACHES

7. Regional (Bangladesh, Indonesia, India, Sri Lanka, Myanmar, Maldives, Malaysia, Thailand): Sustainable Management of the Bay of Bengal Large Marine Ecosystem (FAO/ADB) (GEF Financing: $ 14,266,055) GEF ID = 9909

✓ France’s Comments

- The heart of the Sunderbans aera is a UNESCO natural heritage. The government is however promoting, on its surroundings, the creation of new industrial parks, some showing suboptimal ecological footprint (including coal fired power plants).
- We would like to flag the risk of a GEF-supported project including a management plan combining conservation and economic development, though well-intentioned, which would be used to provide a justification to over-polluting estates.

Opinion: favorable provided the above risk is properly addressed

✓ Germany’s Comments

- Germany approves this PIF.

✓ Norwegian-Danish’s Comments

- We recognize the complexity of the project and that it is an ambitious project. We would like to emphasize that the success of the project largely depends on the cooperating countries’ ability to implement relevant action to address the problems identified. A large part of the area addressed in the project are within exclusive economic zones (EEZ). Over-exploitation of marine living resources, degradation of critical habitat and pollution/water quality are mainly problems in the coastal
zones and EEZs and have to be addressed at the national level. There is however
great benefit in seeing these in a regional context and ensure synergies, through
acquiring/sharing of knowledge and best practices.

- Building on the lessons learnt, previous evaluations and the cooperation already
  established in the region, the project has a good point of departure. The work on the
  Transboundary Diagnostic Analysis (TDA) and Strategic Action Program (SAP)
  will help the work on advancing ecosystem-based management.

- Pollution, over capacity and illegal fishing are threats to marine food resources.
  Healthy oceans are key to achieving food security and poverty reduction. The
  project aims at ensuring improved livelihoods and give emphasis to problems faced
  by small scale fishing communities. These aspects are of great importance and
  strengthens the project. The project gives emphasis to involvement of stakeholders,
  gender issues and human rights.

✓ U. S’s Comments

- We suggest establishing a regional mechanism for coordination and collaboration at
  the BOBLME level in order to catalyze the implementation of the SAP and bring all
  baseline programs under one umbrella. Currently there is no governing body or
  environmental convention that has a complete mandate over aspects of the SAP
  across its entire geographical range. Please consider including this is the next
  version of the document, or explain to us why you do not think this proposal is
  viable.

- We would like more clarity on how the large populations of indigenous
  communities that depend directly on coastal and marine resources were included in
  the consultation and collaboration process to date, and detail on how they will be
  involved (not just consulted) moving forward. We appreciate the additional
  information that both FAO and ADB have strong indigenous peoples safeguards
  policies, but information on how they will be influenced by and involved in the
  project must be made explicit by the next iteration of the project document.

- We look forward to more detailed and specific project objectives, and information
  on project monitoring, evaluation, and knowledge management. This includes
  clarification of what constitutes “strengthening” a marine managed area (MMA) –
  one of the project outcomes. Please include these details in the next version of the
  project document.

- It would be helpful if the program activities can be broken down by regional and
  country levels, to more easily map this program against ongoing regional and
  national projects supported by the U.S. and our partners.

- We suggest that the project collaborate with NOAA, which has a long-standing and
  productive relationship and partnership with the BOBLME, and can help provide
  insight into the joint development and implementation of training materials for an
  ecosystem approach to fisheries management (EAFM). EAFM is a major focus of
  Component One (sustainable management of fisheries) and its respective Program
  Outcomes in this project identification form (PIF). We are happy to make the
connection between NOAA and the project team, please reach out to Rebecca Fisher (Rebecca.fisher@treasury.gov) and Elizabeth Nichols (nicholses@state.gov).

- In the next iteration of this document, please include explicit outreach and education activities related to the benefits of EAFM for sustainable fisheries, since these activities may contribute to reduced risk of continued overexploitation of fisheries resources and habitat destruction.

- We suggest linking Outcomes 2.1 and 2.2 directly to Outcome 2.3, so that all noted species of concern (including the Irrawaddy Dolphin, Indian Ocean blue whales, dugongs, whale sharks, sea turtles, etc.) are addressed with the MMA development, management effectiveness, and capacity building.

- We strongly support that MMA development is planned in accordance with predicted climate-induced shifts of species and habitats.

- In addition, we would like to clarify that NOAA has made no co-financing commitments at this time, but would be happy to consider this during the PPG phase.

- We suggest improving the project’s current Theory of Change (TOC) so it can inform regional and country contributions towards the program’s outcome. Please include this in the next version of the PIF.

- To ensure that both funder and implementing partner have the same expectations, a series of definitions used in the program outcomes should be added, such as: fish stocks, fisheries management unit, platform, MPAs versus MMAs, EAFM Plan, etc.

- We look forward to greater clarity regarding who will endorse the regional documents, such as regional plan of action (RPOA) for ETP species, and the RPOA for IUU Fishing.

- We recommend increasing project support to livelihood activities. In the document, livelihood support is limited (i.e. a single country has a pilot program) and this may compromise the long-term sustainability of the project. Please consider amending the project document as such, or explain to us why this is not a viable solution.

- We advise reconsideration of the plan for a 20% increase in the “landings” of higher value fishery species. This target should be for 20% increase in “value”, not in landings.

- We look forward to greater clarity as to how the project will be sustained following the GEF grant conclusion.

MULTI FOCAL AREA


✓ France’s Comments

The goal of the project is to improve the understanding, use, management and
protection of coastal aquifers in Republic of Palau, Tuvalu and the Republic of Marshall Islands towards enhanced water security within the context of a changing climate. To achieve these objectives the project includes three components: i) improved knowledge of coastal aquifers, ii) adaptive land and groundwater management, iii) strengthened island-based water governance towards improved national scale governance.

We strongly support this proposal and would suggest reinforcing two points:

- to reconcile sectorial approaches, such as integrated water resource management or sustainable management of lands and watershed, and to secure the collaboration of all stakeholders in this process, adopt ICZM approaches (Integrated coastal zone management), and build on existing local multi-stakeholder initiatives covering terrestrial and coastal ecosystems, such as Integrated Coastal Development Commission (if existing);

- to motivate changes in local practices like inappropriate land-use activities, use the economic lever and support sustainable economic alternatives activities and the social lever, informing all stakeholders on natural ecosystem services.

Opinion: Favorable

✓ Germany’s Comments

- Germany approves this PIF.

✓ U. S’s Comments

- We would like to see greater investment in infrastructure and waste management activities that will complement the focus on coastal aquifer management, and help address the root causes of drought and pollution issues faced by PSIDS.

9. Sao Tome and Principe: Enhancing Capacity for Biodiversity Conservation and Protected Area Management (UNDP) (GEF Financing: $ 4,262,559) GEF ID = 10007

✓ France’s Comments

- Although we support the overall objectives of the project, we believe the PIF substantially lacks of information providing the context of this project and, as a result, the project does not appear to be properly articulated to the ongoing initiatives on the biodiversity conservation in Principe. More specifically:
  - there is no mention of the gas and oil exploration plans and how the project could deal with these
  - there is a mention of the Regional Directorate of Environment and Nature Conservation but others are missing such as the fisheries, infrastructure and tourism. The legal framework may also need to link with the regional parliament as the national government has no power to legislate in Principe about land planning and protected areas, unless the status of the protected is a
National Park. If it is intended to create a protected area, then the issue is not only capacitiation of technicians and rangers but also at the institutional level it is needed to ensure institutional, legal and functional/operational capacity and understanding.

- the existing donation scheme of the UNESCO Biosphere Reserve is totally ignored when it has already marine and coastal areas with the highest level of protection (core zones), including the Tinhosas Islands. No reference is made of the existing programs for the establishment of Marine Protected Areas in Príncipe that were presented officially and in public sessions at the time (and several times after) of the Scientific Expedition: BioPríncipe 2016 that was developed precisely aiming the collection of base line to support the establishment of marine protected areas. Several reports and technical papers where published already (even today a new species of marine mollusk was presented at the Portuguese National Congress of Malacology), and are ignored.

- In resume, we think that the baseline (scientific and institutional) should be revised in order to consider the real and existing features/knowledge and in the case of Príncipe better described how the project will work, who will be the actors doing what. Other institutions may be engaged in Príncipe, namely the Insular Committe under SMILEO as well as the NGO called: Amigos da Reserva da Biosfera, among others.

- Apart from these remarks, we would like to convey our strong appreciation regarding component 4, to the extent that it mentions up-scaling, promotion of innovations, and good practices sharing which are also objectives of French cooperation-supported SMILEO.

*Opinion: favorable provided the above comments are taken into account.*

☑️ **Germany’s Comments**

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

Germany generally welcomes the proposal for a highly relevant project. However, Germany shares some of the minor concerns of STAP especially regarding the need for a thorough analysis of governance and management options for the marine and terrestrial protected areas of Sao Tome and Principe.

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

- As a first step, Governance Assessments should be conducted to identify appropriate governance and management arrangements among public institutions, local population and eventually other actors.

- Sao Tome and Principe is member of the Central African Forest Commission. Therefore, the project should actively engage in regional dialogues on protected areas with other COMIFAC members and build on orientation and tools developed in COMIFAC with support of the Regional project “Support to the Central African Forest Commission” implemented by GIZ on behalf of the Federal Ministry for
Economic Cooperation and Development (BMZ).

✔ **U. S’s Comments**

- We suggest stronger coordination with the United States Government in Sao Tome and Libreville. Please reach out to Rebecca Fisher (Rebecca.fisher@treasury.gov) and Elizabeth Nichols (nicholses@state.gov) to initiate this connection.

- We would appreciate more explicit detail in the PIF on exactly how strengthened institutional arrangements and capacities will ensure sustained project activities.

- We would appreciate greater detail about the abilities of the government to meet the co-financing obligations of this project.

- We would appreciate greater detail on the expected output of rehabilitation of critical infrastructure including the Obô Natural Park building in Principe.

- We recommend that the Directorate of Tourism, Coast Guard, Directorate of Fisheries, and local authorities in Sao Tome be included in the coordination team.