



GLOBAL ENVIRONMENT FACILITY
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**COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE GEF
MAY 2017 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 May 2017 Work Program

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**MAY 2017 GEF INTERSESSIONAL WORK PROGRAM:
COMMENTS FROM COUNCIL MEMBERS
(REFERENCE: GEF/C.52)**

BIODIVERSITY

1. Regional (Marshall Islands, Niue, Tonga, Tuvalu): Strengthening National and Regional Capacities to Reduce the Impact of Invasive Alien Species on Globally Significant Biodiversity in the Pacific - UNEP- GEF ID = 9410

✓ *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, supports the STAP recommendation that the PPG includes an assessment of the institutional match between the complexity of the project and the capacities in place to implement it, and adds the following suggestion for improvement during the design of the final proposal:

- The PIF states that “87% of recorded introduced species are plants, 10% animals and 3% other taxa”. The proposed project focuses mainly on the eradication of rodents and marine species (fauna). While not disagreeing with this focus, Germany suggests that the final project proposal includes additional information on the biodiversity impact of these three categories (plants, animals, other taxa) for the four project countries as justification of the proposed focus.

2. Cabo Verde: Managing Multiple Sector Threats on Marine Ecosystems to Achieve Sustainable Blue Growth - UNDP- GEF ID = 9705

✓ *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 full proposal should clearly explain in Project component 1 (project outputs 1.1 and 1.2), how the government authority that will oversee and lead the Integrated Marine Spatial Planning Process, will be strengthened and how the necessary policy

changes will be implemented with GOCV. This is very important, given that coastal and marine policies appear to be very sectoral in Cape Verde and that the management authority does not have a strong mandate.

- Germany seeks clarification on the nation-wide marine certification of fisheries products through MSC (Project component 1, output 1.5). MSC certification is usually specific for a given fish stock and fishing fleet. Multiple species, fishing fleets and gear types are very difficult to certify, especially in data-deficient fisheries. Please specify which fisheries would be included in the assessment and if sufficient data are available to conduct the analysis.
- The final proposal should ensure that gender issues and impacts are not only monitored but explain how gender issues are addressed in the specific interventions.

3. Nicaragua: Resilient Landscapes Management Project – World Bank - GEF ID = 9579

✓ Canada's Comments

- This project is highly relevant for Nicaragua considering its vulnerability to natural hazards and increasing land degradation.
- By improving the management of protected areas, and reducing land degradation and biodiversity loss, the project will contribute to and strengthen the climate change mitigation and adaptation actions being undertaken by the Government of Nicaragua, under the leadership of the Ministry of the Environment.

✓ 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 and its support to the implementation of Nicaragua's NBSAP, its strategic framework for achieving the Aichi Biodiversity Targets. Against this background, Germany suggests that the final project document elaborates clearly how the proposed project activities contribute to strengthening the institutional structures and coordination as well as policy and economic instruments for the implementation of this national strategy. This is especially relevant for the project's component on mainstreaming of biodiversity objectives into other sectors. Additionally, Germany has the following minor suggestions for improvements to be made during the drafting of the final project proposal:

- The project aims to work in a rather large area with a high number of very different and distant protected areas, which is likely to pose logistical and budgetary challenges. The full proposal should clearly identify how these challenges will be tackled and the outputs achieved with the available resources.

- Regarding item 20, Management of Protected Areas – The Challenge a), b) and c) (Document https://www.thegef.org/sites/default/files/project_documents/03-29-17_Project_Document_Concept_Stage.pdf) Germany suggests that
 - the final project document gives a more detailed and balanced assessment of the capacity gaps among the implementing actors and lay out how the project will contribute to bridge those.
 - Germany agrees with the assessment that economic alternatives and incentives or mechanisms that can promote sustainable land-use practice are needed. Concerning testing and piloting initiatives in for example agroforestry or tourism, Germany suggests that the final proposal indicates how already existing experiences and their potential for upscaling will be considered.
- The full proposal could benefit from laying out more clearly how the proposed project activities will be interlinked with the mentioned parallel projects within the project area such as or a new programme on Protection and Conservation in the upper basin of the Coco river focusing on adaptation to the climate change in community strategic alliances. In both projects, MARENA is the leading agency and the target groups are partly identical. The final project proposal should therefore outline clearly how the GEF project will interact synergistically with ongoing activities.

CHEMICALS AND WASTE

4. **Global: Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM) – UNEP - GEF ID = 9771**

✓ Germany's Comments

Germany requests for the following projects that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:

- Germany welcomes the project but requests some changes with regard to the project design and clarification on its objectives. Listed outputs and activities are not adequately aligned with its overall goal (= acceleration of the adoption of emerging policy issues for achieving the 2020 implementation of the SAICM goals) and lack specification. Furthermore, most of the proposed knowledge products tend to duplicate existing products on the market and their added-value does not seem clear.
- Germany concurs with all major issues raised by the STAP Review (8 March 2017) and recommends a revision in line with these STAP Review suggestions.

5. Bangladesh: Pesticide Risk Reduction in Bangladesh – FAO - GEF ID = 9076

✓ *Germany's Comments*

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

- This is a well-designed project addressing persistent organic pollutants (POP) pesticide use and management, regulation and enforcement, and awareness and communication. Germany suggests some minor changes regarding the use of scientific baseline data and specification of methodologies:
 - Component 3: POPs-pesticide uses to be addressed
 - Output 3.2.: Improved monitoring and reporting of POP pesticide residues in food, POP pesticide contamination in the environment
 - Germany recommends identifying and specifying methodologies with respect to i) monitoring the impacts and presence of pesticides in food and ii) detecting the sources of POPs residues in food, feed and the environment:
 - Output 3.3.: Promotion of alternative, low hazard pest control options in agriculture and public health
 - Germany suggests further specifying and assessing the low-risk pest management options mentioned under this output.

6. Maldives: Eliminating POPs through Sound Management of Chemicals – UNDP - GEF ID = 9562

✓ *Germany's Comments*

- Germany approves this project.

CLIMATE CHNAGE

7. Bhutan: Bhutan Sustainable Low-emission Urban Transport Systems – UNDP - GEF ID = 9367

✓ *Canada's Comments*

- We share STAP's concerns regarding how potential GHG emission reductions were calculated and this should be clarified in the final funding proposal.

- Additional information on why the project hybrid vehicles are included as an option to reduce GHG emissions when battery electric vehicles have been shown to be the more cost-effective option would be useful. Battery-operated bicycles, rickshaws and other smaller vehicles might also be viable.
- The project suggests using GEF resources to invest in 20 electric vehicles as a demonstration. However, there are already electric vehicles being used, including for taxis, in Bhutan that could serve as a demonstration. Has offering incentives for taxi owners to change their old taxis into EVs been considered?

✓ **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 proposed project proposal that aims at shaping the transport sector of Bhutan in a sustainable and climate friendly way. Germany suggests taking a closer look at the informal sector, mentioned as a key factor in urban transportation; however, challenges (and opportunities) are not clearly addressed throughout the proposal. Moreover, the private sector plays an important role and is expected to leverage significant co-financing. In this context, Germany recommends to further evaluate the risk of lacking interest and investment from the private sector as well as the possibility of using public private partnerships (PPP).

8. China: Achieving Efficient and Green Freight Transport Development in China – World Bank - GEF ID = 9682

✓ **Canada's Comments**

- We note that the proposal is well-aligned with China's overall national climate change strategies, particularly its iNDC/NDC, which specifically mentions the need to reduce GHG emissions from the transportation sector, including "the development of smart transport and green freight transport".
- It is notable that this project, by reducing diesel emissions in the transport sector, will also reduce black carbon emissions – a very important short-lived climate pollutant.
- A stronger justification for climate finance support from the GEF for this project is requested. Improving the efficiency of freight transportation in China is good business and will likely generate substantial cost savings for project beneficiaries. In addition, we request that contributions from project beneficiaries be clearly identified and included in project funding. In particular, we note that while the private sector is

involved in project consultation, those that will benefit from the project have not contributed to the project financially.

- There is a discrepancy between the project costs listed in the GEF Work Program document (total project costs at \$163,666,095 with \$8,246,095 from GEF) and the costs included on the Basic Information page of the project's Project Information Document (PID) (total project costs at \$171,020,000 with \$15,600,000, from GEF). Please confirm which costings are correct.
- Component 2E: Hubei Province includes the implementation of a \$150 million World Bank loan to construct the Yakou Navigation-Hydropower Complex under the Hubei Inland Waterway Improvement Project, which appears to be included as co-financing of this GEF project. However, the Safeguards section of the PID states that "the project will not involve any dams" and therefore the policy safeguard, as well as any environmental impact assessment, is not considered. If the project co-financing includes the hydropower dam, then it is an integral part of the project and the project should follow an environmental and social impact assessment process accordingly. Otherwise, this co-financing should not be included as part of the GEF project.
- The STAP's notes that the PID does not include an estimate for expected GHG emission reductions. The separate GEF datasheet for the project mentions an expected GHG reduction of 0.5 million tonnes CO₂e, but does not explain how this figure was estimated. If this is the estimate, it is fairly low for a US\$164 million project. We request that an estimate for expected GHG emissions reduction, with clear explanations for how the figures were reached, be provided prior to final approval.

✓ **Germany's Comments**

Germany requests for the following projects that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:

Germany requests for the following projects that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:

Germany welcomes the proposal, especially the promotion of improved driving behavior among truck drivers in section D/1C/c. Germany sees the strong need for-, and easy achievable benefits by, integrating eco-drive techniques to the standard driver training for professional drivers. Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Germany recommends for the general project concept that the project will develop a statistical system for energy consumption and emissions in the freight sector. Concurrently, Germany requests a review of the methodologies for calculating energy consumption and GHG emissions for freight transport and logistics services (section D/1C/b). Germany seeks specification on the stakeholders that will participate in the Information System to Support Intermodal Freight Transportation (section D/1A/e.) and to extend the stakeholders involved in the study on standard development for data format and communication interface protocol for a national logistics platform, and

policies and procedures for information sharing and exchange. Germany strongly recommends that the study should integrate intermodal operators, railway undertaking, road hauliers, port and terminal operators, transportation administration authorities, customs etc.

9. El Salvador: San Salvador Low-emission Urban Development Path – UNDP - GEF ID = 9038

✓ **Canada's Comments**

- The expected GHG emissions of 650,000 tonnes CO₂e seems low for a \$40 million project. Additional information on the calculation of this estimate and rationale for its cost-effectiveness is requested.
- One of the two project components is focused on improving the city's bus rapid transit system, yet bus ridership is adversely affected by security concerns in San Salvador. Does the project proponent plan to address this issue and increase public transit use?
- The other project component focuses on energy efficiency in municipal buildings, including air conditioning. The final project proposal should indicate how this work will be coordinated with El Salvador's work under the Montreal Protocol.
- Could additional explanation of the complementarity or overlap between JICA-funded initiative and the GEF (\$1 million) investment on the energy efficiency component be provided?
- The specific results expected from the transport component are unclear. What are the expected outputs and outcomes associated with working on inter-connection corridors with the Bus Rapid Transportation system?

✓ **Germany's Comments**

Germany requests for the following projects that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:

Germany requests that the following points be taken into account during the drafting of the final project proposal:

- Component 2 of the proposal consists in enhancing the surroundings of San Salvador's metro-politan Bus Rapid Transport (BRT) system SITRAMSS. However, the future of SITRAMSS is presently at stake. The metropolitan road network, not designed for the present number of vehicles, is chronically congested at peak hours – especially along some main axes that were later converted into SITRAMSS routes, with only one or two lanes remaining for other traffic. This has generated complaints from private transport operators as well as private users. As a reaction, an order of the

constitutional court (8 May 2017) has recently opened the BRT lanes for general traffic. This measure makes the BRT system virtually obsolete; the private operating company has already threatened to withdraw from the project (11 May 2017). While the Government does manifest a strong interest in maintaining SITRAMSS, there are strong opponents also – leading to the risk that SITRAMSS might fail. As long as this has not been finally decided, there might be a chance for the GEF project to provide advice and mediation. Germany requests that the final proposal consider this ongoing process and be adapted if necessary.

- The proposal (§10) mentions the poor quality of the existing bus fleet operated by the private sector under government concession. These buses, usually old U.S. school buses, generate 51% of the country’s PM10 emissions – a problem that makes some of the measures outlined in the proposal seem rather marginal. However, the proposal presents no concrete plans to improve the public transport fleet. Germany requests integrating solutions for fleet improvement into the project design (see STAP comment, page 2: “The project should seek to implement more ambitious climate- and environment-friendly alternatives such as electric or hybrid engines”). Measures such as designing a phased plan to take vehicles out of service once they are more than x years old, enforcing stricter import norms, establishing green procurement and financing schemes, etc. would also help fulfil El Salvador’s First NDC (see page 14, § 3.7.4 and 3.7.5).
- The Republic of El Salvador has recently been downgraded in credit ratings (see <http://www.datosmacro.com/ratings/el-salvador>), which leads to doubt as to whether the envisaged co-financing (US\$ 19 million from the Ministry of Public Works, US\$ 15 million from the National Energy Council) can be achieved. Germany requests that the final project document take these factors into account.

10. Mauritius: Realising Energy Savings and Climate Benefits of Implementing Mandatory Energy Auditing in Coordination with HCFC Phase-out and HFC Avoidance – UNDP - GEF ID = 9612

✓ Canada’s Comments

- We strongly support the coordination between the GEF and the MLF on energy efficiency and HFC phase-down in this project. The cost effectiveness and high co-financing of this project is of note.
- Page 7 of the proposal states that there are barriers specific to the manufacturing sector in the area of energy efficiency. The final project proposal should identify these barriers and include strategies to address them.
- We request clarification of why GEF grant resources, in addition to AFD’s loan contribution, are needed for Component 3 – establishing a line of credit for energy efficiency. Further, if additional capital is needed to supplement AFD’s funds, was the provision of a non-grant instrument considered?

- For a country like Mauritius, which does not manufacture any refrigeration and air conditioning (RAC) equipment, improvements in energy efficiency will only be guaranteed if minimum energy performance standards (MEPS) are incorporated into regulations, so that the import and/or use of less efficient equipment is eventually prohibited. While the project will include the development and implementation of MEPs, could it be clarified whether the intent is to ensure such standards are adopted through regulations?

✓ *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 proposed project and appreciates its innovative character. The mentioned project addresses two international conventions (UNFCCC and Montreal Protocol) and combines energy efficiency and natural refrigerants. Furthermore, it paves the way for Mauritius to an early transfer towards climate and ozone layer friendly technology in the RAC sector. The small island state thus becomes a key frontrunner in complying with the Kigali Amendment (October 2016) to phase-down HFCs.
- Although HFOs have a high mitigation potential, HFOs do not represent a sustainable long-term solution because of their short life span, unknown long-term impacts to the environment as well as dependencies on imports and high costs of refrigerants. Given these facts, Germany kindly asks for the drafting of the final project proposal statements and clarification why the GEF project is considering HFOs, and presentation of possible alternatives.

11. Mexico: Mexico Municipal Energy Efficiency Project (PRESEM) – World Bank - GEF ID = 9564

✓ *Canada's Comments*

- The cost effectiveness and high co-financing is of note. As is the alignment of the project's goal of reducing GHG emissions by improving municipal energy efficiency of water, waste treatment, and lighting with Mexico's iNDC/NDC targets.
- GEF project funds are to be used to set up a municipal contingency facility, to minimise the risks of non-payment by municipalities and water utilities. However, the World Bank has already set-up a municipal investment fund. Could additional information on the complementarity or overlap of these municipal contingency funds please be provided?

✓ *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 proposal, and would like to emphasize the need to conduct actions in support of energy efficiency projects at the municipal level. The experience gained by German Development Cooperation projects in Mexico has shown that there is a high potential to reduce energy consumption in the applications that the PRESEM Project has chosen as a priority.
 - The Municipal Energy Efficiency Project (PRESEM) shows a very clear conceptual design with two components that support the development of public policies at the municipal level and to strengthen institutional capacities in the first one, and to directly finance energy efficiency projects in the second one.
 - Mexico has requested the World Bank's assistance for an additional finance using GEF grant resources for the Mexico Municipal Energy Efficiency Project, to develop a contingency facility to cover the non-payment risk of the agreed contributions from municipality or municipal water utility.
 - A single point should be clarified and refers to the estimation of the amount needed for the Contingency Facility. It is not clear how the amount of the requested USD 5.79 million is determined. The design of a guarantee-fund such as the Contingency Facility that is suggested, requires specific information about the historic behavior of similar credit lines. With this information, it is possible to estimate a leverage factor of the guarantee fund, to estimate the relationship between fund resources and funding resources that can be supported by the fund. This information should be provided in the final project documents.

INTERNATIONAL WATERS

12. Global: Building Partnerships to Assist Developing Countries Minimize the Impacts from Aquatic Biofouling (GloFouling Partnerships) - UNDP - GEF ID = 9605

✓ *Germany's Comments*

Germany approves this PIF.

- Germany welcomes the proposal. In particular, building capacity in developing countries for implementing the International Maritime Organization (IMO) and other relevant guidelines for biofouling management is seen as crucial for the project's success. The demonstration of the value of jointly combating the transboundary introduction of biofouling-mediated invasive aquatic species together with catalyzing

overall reduction of GHG emissions from global shipping represents a sound and promising approach.

13. Global (Chile, India, Namibia, Ukraine, South Africa): Strengthening Capacity for International Cooperation in the Ecosystem-based Management of the Antarctic Large Marine Ecosystem – UNDP - GEF ID = 9443

✓ *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 approach of increasing effective participation of the five GEF-eligible countries (Chile, India, Namibia, South Africa and Ukraine) at CCAMLR meetings, strengthening of scientific measures and approaches as well as the sustainable management of fisheries including the joint fight against illegal, unreported and unregulated fishing in the Antarctic Large Marine Ecoregion. The proposal is well written and anchored within the framework of the CCAMLR. In the proposed output indicators listed in table/section B., Germany would like to see the development of an ecosystem-based fishery management system, under participation of all stakeholders, that allows to manage stocks on an actual biological basis rather than on historical catch data as mentioned in the proposal.
- Should Chile have graduated from the ODA-eligible countries list before submission to the Secretariat, we request that Chile be taken out of the list of beneficiaries for this project.

14. Regional (Indonesia, Cambodia, Lao PDR, Myanmar, Malaysia, Philippines, Vietnam): Reducing Pollution and Preserving Environmental Flows in the East Asian Seas through the implementation of Integrated River Basin Management in ASEAN Countries – UNDP - GEF ID = 9654

✓ *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

- Under A.4 Risks: Germany would like to see a mention and evaluation of alternative approaches, especially for the second risk mentioned “lack of national and local political support”. Collecting all the river basin linked data of different uses will

touch many and even sensible interests. If there is a lack of political backing, how to proceed? Coalitions of those willing to go ahead may be one option.

- Germany seeks clarification on the role of the ASEAN Centre for Biodiversity (ACB), which is not mentioned in the proposal. The project proposal might benefit from considering potentials of collaboration with the ACB, especially as PEMSEA and ACB closely collaborate on regional marine related topics.

15. Regional (Mozambique, Zimbabwe) : Management of Competing Water Uses and Associated Ecosystems in Pungwe, Busi and Save Basins – IUCN - GEF ID = 9593

✓ 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: Strengthening the transboundary cooperation as well as the management of water resources and associated ecosystems for improved water security, climate change resilience and sustainable livelihoods are sound and proven-to-work approaches. However, a higher prioritization of small-scale fisheries in the project design is seen as crucial for the project's success. Inland fisheries are typically small-scale and subsistence in nature. This makes it difficult and costly to track their yields using conventional landing-based methods. FAO assumes that statistics underestimate inland fisheries catches by at least 50 percent (FAO SOFIA 2016 – p.114). Underestimating inland yields, their importance for local livelihood and food security as well as the ecosystem services that the river basins provide, often translate into water management plans that ignore the needs of these fisheries. Whereas this sector can serve as a natural ally in promoting the Environmental Flow Management Framework, without interventions it might happen that resource-overutilization and destructive fishing methods negatively overcompensate the project intended improvement of sustainable livelihoods.

- Germany would like to add the following:
 - The project documents should incorporate the promotion of sustainable fisheries in their component 3 design (transboundary environmental flow policy and regulatory framework [...] strengthened). These interventions should be fully in line and actively assisting the implementation of the FAO Code of Conduct for Responsible Fisheries (CCRF) as well as the FAO-Voluntary Guidelines on Small Scale Fisheries (VGSSF).
 - The project should actively seek for more synergies gained from exchanging lessons learned as well as aligning activities with other international projects in the region, like the SADC fisheries programme (2015-2020) active in the

management of shared [inland] fisheries resources at the Zambezi River Basin.

- In order to ensure synergies and complementarity, Germany kindly requests to coordinate with two related projects implemented by GIZ on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ):
 - The bilateral project “Adapting to climate change in Mozambique” also works with the National Directorate for Water Affairs and the ARA-Centro. It supports the development of national framework conditions and actions within the catchment of the Buzi River to adapt to the impacts of climate change on water resources. It uses i.a. approaches and experiences based on GTZ projects on Disaster Risk and Flood management that date back to 2005, which are mentioned in the IUCN/GEF proposal (PIF doc, p. 12).
 - The regional “Transboundary water management in SADC“, co-financed by the UK Department for International Development (DFID). It supports the implementation of selected harmonised policies and strategies for transboundary cooperation in the water sector in the SADC region and will run until 2019.

LAND DEGRADATION

16. Iraq: Sustainable Land Management for Improved Livelihoods in Degraded Areas of Iraq - FAO - GEF ID =9745

✓ Germany's Comments

Germany requests for the following projects that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:

- Germany welcomes the proposed project as it aims to improve livelihoods and ecological conditions in one of the most degraded landscapes of Iraq. The intended combination of sustainable land management and ecosystem restoration is promising but should be further elaborated. It is not always clear how agricultural use and conservation can be combined and how trade-offs can be addressed. Therefore Germany asks to further elaborate on how sustainable land management and marshland ecosystem restoration can be combined:
 - Clarify if activities under component 2 and 3 will be implemented in the same target areas or whether different zones are targeted for agricultural use and conservation/restoration.
 - Distinguish more clearly between identification/assessment of SLM options and their actual implementation on the ground (component 2)

- Germany welcomes that the proposed project is in line with Iraq’s efforts to set and implement LDN targets. Germany highly recommends a value chain approach, which may help to strengthen business plans and marketing efforts (output 2.1.6 and 3.2.4). Germany would like to note that some of the indicators under component 2 do not seem very ambitious given the investment volume, and may need to be revised.
- Finally, Germany would like to note that land rights are a particularly sensitive and conflictive issue and Iraq, therefore the issue of land rights should be taken into account in the development of the project.

17. Turkey: Contributing to Land Degradation Neutrality (LDN) Target Setting by Demonstrating the LDN Approach in the Upper Sakarya Basin for Scaling up at National Level - FAO - GEF ID =9586

✓ *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 proposed project and considers it highly relevant and innovative. The concept of Land Degradation Neutrality (LDN) is still new and experience from implementation is so far very limited. The proposed project is therefore likely to generate lessons learnt that are relevant beyond the target area including national and international discourses on LDN. Component 4 on upscaling is therefore considered particularly relevant.
 - Germany suggests making the phases mentioned in section A.2 fully in line with the latest guidance on LDN. UNCCD and the Global Mechanism have recently developed additional guidance material for the implementation of LDN (including a LDN conceptual framework).
 - Germany recommends to further clarifying when and how LDN targets are actually defined in the process of project implementation. Target setting is first a political process that defines the level of ambition early on in the process and based on sound technical information.
 - Germany would like to note that there is a risk that LDN planning and implementation may become a parallel “stand alone” process. Therefore, Germany suggests addressing the need for integration of LDN into existing policies and plans should be further strengthened. Ideally, LDN can serve as a target and common vision for various land use and planning processes.

MULTI FOCAL AREA

18. Global (Argentina, Burkina Faso, Bhutan, Belarus, Colombia, Cabo Verde, Dominican Republic, Eritrea, Gambia, Jamaica, Madagascar, Mali, Malaysia, Nepal, Panama, Congo DR): GEF SGP sixth Operational Phase- Strategic Implementation using STAR Resources Tranche 1, mainly in LDCs and SIDs (Part III) - UNDP - GEF ID = 9774

✓ *No comments were received for this project.*

19. Regional (Cabo Verde, Gambia, Guinea-Bissau, Senegal): West Africa Regional Fisheries Program Phase 2 – World Bank - GEF ID = 9797

✓ *Germany's Comments*

- Germany approves this project.

20. Argentina: Mainstreaming Biodiversity Conservation and Sustainable Land Management (SLM) into Development Planning: Making Environmental Land Use Planning (ELUP) Operational in Argentina – UNDP - GEF ID = 9583

✓ *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, which is coherent in its design and highly relevant for achieving global environment goals by promoting environmental land use planning with an integrated and multilevel approach.

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

- Due to its thematic and conceptual parallels to the land degradation neutrality goal (SDG 15.3/ UNCCD), the full proposal should indicate how the ELUP will be linked to the national LDN process.
- Provide further detail on how the project will support the institutionalization of a “consolidated ELUP information system” (Component 1) in order to guarantee its multisector acceptance as well as the national ownership for its continuity (staff and funding).
- With regard to the activity “pilot mechanisms for inter-institutional stakeholders and for multi-sectoral decision-making” as well as the “establishment of platforms” (Component 2), Germany suggests to describe existing relevant platforms or

mechanisms that can be strengthened and, in the case new platforms or mechanisms are to be established, provide a respective rationale.

- With respect to the integrated approach of ELUP, Germany suggests that the final project proposal describes roles of the other relevant sector ministries (i.e. Ministry of Agribusiness, Ministry of the Interior, Public Works and Housing) within the project in more detail.

21. Benin: Sustainable Forest Management and Conservation Project in Central and South Benin – AfDB - GEF ID = 9383

✓ Canada's Comments

- The project component related to the development of local capacity with regards to Sustainable Forest Management is of note.
- We support the view that forests can complement agriculture production and provide households with livelihoods when managed in a sustainable way.

✓ Germany's Comments

Germany requests for the following projects that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:

Germany welcomes the proposal and notes environmental and adaptation challenges, root causes and barriers are addressed in the description of the project. However, Germany seeks clarification on those drivers of deforestation and land degradation that come from sectors outside of forestry. The institutional response to this challenge is difficult to organize from within the sector (Ministry of Environment). Furthermore, Germany would like to point out that the project proposal does not adequately address the governance of forest resources, including law enforcement. In addition, the proposal would benefit from further elaborating the mentioned innovative character and the scaling-up potential, which is not clear from the project proposal.

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

- Clearly describe how the Ministry of Environment will lead other sector ministries/ decentralized local government entities to changes in production/ consumption patterns (agriculture, transhumance, others), and how to sustain effects within institutions.
- Develop clear answers and strategies as to how forest law enforcement will improve governance of forest resources.
- Explain economic opportunities of climate smart value chains (beyond teak

plantations).

- The project proposal should address intended solutions to challenges arising from pastoralism.

22. Colombia: Contributing to the Integrated Management of Biodiversity of the Pacific Region of Colombia to Build Peace – FAO/UNIDO - GEF ID = 9441

✓ Canada's Comments

- This project is aligned with national priorities, primarily the National Development Plan 2014-2018, Colombia's commitments under the Convention of Biological Diversity, the Biodiversity Action Plan, the National Green Business Plan and the Somos Pazcifico Program. It also complements other activities undertaken by state institutions, NGOs and several donors. We encourage coordination with these efforts and with government programs.
- The project has the potential of contributing to the implementation of the peace agreement, primarily in the rural development chapter, as well as sustainable livelihoods for displaced populations who return to their territories, indigenous and afro-Colombian communities and possibly demobilized combatants. However, the presence of illegal armed actors and illicit economic activities may put pressure on the project's beneficiaries and partners. Are there mitigation measures in place to address this?
- Additional information on FAO and UNIDO's experience in this type of programming and capacity to implement the project in the region, including support from the different partners listed in the project proposal is requested.
- We would like to see a more robust gender analysis conducted prior to final approval and more information on the innovative approaches to forestry management, biotrade and productive practices.

✓ 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 full proposal should clearly identify the challenges to fulfilling basic parameters (such as production in sufficient quantity and quality) prior to discussing import substitution of foreign products.
- Indicators of project component 1 (Institutional strengthening to support the

mainstreaming of biodiversity conservation and sustainable use in the Pacific region of Colombia) should have a stronger focus on results, that is on implementation and monitoring of plans rather than on the planning itself. While first approaches are described under outcome 1.2., Germany suggests that these should become a primary focus of component 1 in the final project proposal.

- With regards to the partners outlined in the PIF the institutional post-conflict architecture has only recently been adjusted and a coordinating authority has been put in place with the Alta Consejería para el Posconflicto, Derechos Humanos y Seguridad – ACP. The Institute for Rural Development (Instituto Colombiano de Desarrollo Rural – INCODER), a subordinate agency of the Ministry of Agriculture has been dissolved and three new national entities have been created (Agencia Nacional de Tierra – ANT, Agencia Nacional de Desarrollo Rural – ADR, Agencia Nacional de Renovación del Territorio – ART). Additionally a High Commission for Landuse Planning has been established (Consejo superior del orden del suelo rural). The exact assignment of responsibilities between these and already existing institutions is still under discussion. These imponderabilities should be considered within the risks.
- With regards to the potential biodiversity products mentioned in the Annex, Germany encourages to ensure that access and benefit sharing (ABS) relevance is checked with the national ABS focal point or with the ABS Competent National Authority.

23. Cote d'Ivoire: Sustainability and Scaling Up Approaches for Transformational Management, Restoration and Conservation of Forests Landscapes and Biodiversity in Cote d'Ivoire (SSATMARC –FOLAB) – UNEP - GEF ID = 9366

✓ **Canada's Comments**

- This project brings together government actors, civil society, academic institutions, and the private sector around an environmental initiative of great magnitude for the first time, an innovative approach in this area. The project presents an opportunity to generate ambitious results for biodiversity, land degradation and climate change.
- Payment for forest and land-use change projects in developing countries is intricately linked with REDD-plus initiatives – as highlighted in the PIF. Is there a relationship between this project and REDD-plus results-based payments?
- We agree with the STAP that the practical and political challenges of tenure reform are under-estimated; however, we note that the Government of Côte d'Ivoire and its agencies seem highly supportive of this initiative which should help mitigate this challenge.

✓ **Germany's Comments**

Germany requests for the following projects that the Secretariat sends draft final

project documents for Council review four weeks prior to CEO endorsement:

Germany welcomes the ambitious proposal clearly showing Cote d'Ivoire's active engagement for the conservation of biological diversity especially in Ivorian forests. Germany also acknowledges UNEP's efforts to be inclusive in their partnerships. The proposed cooperation among the stakeholders involved at different levels bringing together government actors, civil society, academic institutions, and the private sector around an environmental initiative seems relevant and promising.

- Along these lines, we welcome the envisaged close coordination of the GEF project with the German bilateral cooperation with Cote d'Ivoire. However, we request to only include the amounts that in fact co-finance (sensu stricto) the proposed activities. The PIF lists 4 Mio. US\$ from the German technical bilateral cooperation (p. 3) which from our current understanding should be listed under "parallel co-financing". Against this background and given the relatively high amounts of co-financing in cash we suggest thoroughly rechecking all amounts of co-financing in the elaboration of the final project proposal.
- Regarding the synergies with other ongoing activities on REDD and PES (p.9) we would like the final project proposal to elaborate in more detail if and how upscaling of activities financed through the FCPF Readiness Grants is envisaged with the proposed project.
- Please also elaborate on the relation to the Emission Reduction Program Idea Note (ER-PIN) you proposed to the FCPF Carbon Fund. One of the components of the proposed project focusses on the establishment of a financing mechanism. Will this financing mechanism be developed in a way that it also serves the purpose of results based REDD Finance from e.g. the Carbon Fund?"
- Regarding Component 2 we would like to stress the great importance of strengthening PA management in Cote d'Ivoire and see great potential for synergies with German bilateral cooperation. We suggest focusing on learning formats for stakeholders involved in PA management thereby making best use of the extensive experience especially with Tai NP.
- Regarding Component 3, Output 3.2.3 we generally caution against exaggerated estimations of tourism potential of the national parks. Germany therefore suggests basing GEF-funded activities related to sustainable tourism development on thorough analysis of tourism market potential in Cote d'Ivoire in order to work towards realistic development options putting GEF funds to the most effective use.
- Regarding the Project's contribution to Global Environmental Benefits we suggest to check and if needed adjust the numbers when preparing the final project proposal, especially regarding the 97 000 ha indicated as area under sustainable land management. This number includes 40 000 ha reforestation area in two National Parks. Within National Parks sustainable use is not allowed. The area should therefore not be counted in. Furthermore, the PIF does not indicate where the

mangrove areas targeted by the proposed project are located and what size these areas have.

- Regarding the identified barrier „ineffective management of protected areas“ especially the identified lack of financing we recommend that the final project proposal makes reference to the existing financing structure “Fondation pour les Parcs et Réserves de Côte d’Ivoire (FPRCI)” and elaborate on the linkages between the envisaged projects activities to support protected area management and this already existing structure. FPRCI is currently providing funding to the Tai und Comoe national parks with an envisaged expansion to three additional national parks.
- Regarding the baseline scenario “Upstream investments”: the proposal mentions that the Ivorian Government will work towards the creation of the Ivorian Parks and Reserves Office (OIPR). To our knowledge this institution is not only already existent but also recognized for their successful operations. The final project proposal should be built on updated information. The same holds true regarding the Foundation to fund parks and reserves (FPRCI). Since this institution is also already created, the adequate term would be “to strengthen” rather than “to create”.
- The table provided on p.18 on stakeholders and their roles need revision, for example on the responsibility for corridor creation.

24. Grenada: Climate Resilient Agriculture for Integrated Landscape Management – UNDP - GEF ID = 9577

✓ Canada’s Comments

- The proposed project is consistent with the country’s iNDC/NDC, which states that Grenada should increase its protected forest area to facilitate carbon sequestration. It is also in line with the country’s national priorities set out in the Grenada Agriculture Policy and the 2015 National Agriculture Plan.
- The number of beneficiaries is mentioned under some project components. The total number of people that will directly benefit from the project should also be included in the results framework, and monitored and reported on. An estimated target is requested.
- Project co-financing is slightly low – does the project proponent anticipate generating further co-financing?

✓ Germany’s Comments

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

The proposed project is very relevant and addresses important challenges in the

development of climate resilient agriculture in Grenada. Germany welcomes the comprehensive perspective to develop an integrated approach of sustainable land management (SLM) under changing climatic conditions. Supplemented by operationalizing SLM practices, the current proposal focuses on the development of institutional and technical capacity, such as framework development, monitoring, as well as data and knowledge management.

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

- In-depth information on the existing policy and institutional context, such as on legislation, regulations and instruments in place, could facilitate measuring threats, analyzing underlying causes and could indicate gaps in the existing frameworks. In order to secure sustainable outcomes and impacts of the project Germany suggests considering the inclusion of such database in the design of the final proposal.
- In order to increase the sustainability of the project (component 2.1 and 3.1, 3.2., 3.4. and component 4), Germany suggest outlining how communities and especially agricultural producers will be involved to secure active participation of all stakeholders.
- Specific activities within the watersheds are dependent on micro-conditions, including microclimate and other factors such as soil types and gradient, which would dictate the crops and methodologies for CSA used. Preliminary data on these could be used to present more concrete information on the nature of the interventions within each of the watersheds. Germany suggests that the full proposal should be supplemented by additional maps of the project region (vegetation types, watersheds, socioeconomic indicators) in order to further assist in prioritization of activities within each watershed.
- A close coordination with other relevant ongoing activities and initiatives is strongly recommended. Supporting the STAP recommendations, Germany additionally suggests analyzing information provided under the following links and considering possible synergies in the final project proposal: CATS Programme on: Marine Interventions including Lionfish (http://caribbeancats.org/index.php/components/coastal_and_marine/moliniere-beausejour/),
Climate Smart Agriculture and Waste water management (customized biogas digesters) (<http://caribbeancats.org/index.php/Grenada/Composting/>,
<http://caribbeancats.org/index.php/low-chemical-agricultural-practices/>,
<http://caribbeancats.org/wordpress/wp-content/plugins/download-attachments/includes/download.php?id=2759>),
Water quality monitoring and training (<http://caribbeancats.org/index.php/water-quality-assessment-in-the-moliniere-beausejour-watershed/>).

25. Mali: Scaling up a Multiple Benefits Approach to Enhance Resilience in Agro- and Forest Landscapes of Mali's Sahel Regions (Kayes, Koulikoro and Ségou) – AfDB - GEF ID = 9293

✓ **Canada's Comments**

- The proposed project aims to promote resource planning and management that address socio-economic and climatic priorities. In doing so, it aligns with Mali's national priorities in the agriculture sector and supports the Mali government's current policies of increasing agricultural productivity.
- Conflict dynamics in the central regions of Mali (Ségou, Mopti.) are not overtly considered in this project. There has been a rise of multilayered community-based conflicts involving different ethnic groups over land issues (sharing, access, ownership, rights, etc.) in the region. Further, farmers, pastors and herders are competing over the lands in the central regions. We suggest that the project consider hiring a conflict analysis and resolution focal expert who could assist with any conflicts that might arise during project implementation.
- Youth constitutes one of the most underemployed and marginalized groups in the central regions of Mali. Does the project proponent have plans to incorporate activities that will focus on this vulnerable population?

✓ **Germany's Comments**

Germany requests for the following projects that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:

Germany welcomes the proposed project and considers the proposal highly relevant and innovative. The complementarity between multisectoral, landscape based planning mechanisms and investments into integrated resource management and soil and water conservation at scale addresses the competing demands on vital natural resources. Integration of agricultural production systems (agriculture, livestock, fishery, forestry) is national policy. The project aligns with: The Law of Agricultural Orientation, The Agricultural Development Policy, The National Plan for Investment in the Agricultural Sector and The National Food and Nutrition Security Strategy.

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

- Elaboration of local conventions for governance of natural resources should be mentioned as one important instrument, as it has been widely used in Mali.
- The rationale of integrating outputs 2.2.3 (habitat programme) sub component 2.3 (waste management) into the programme should be argued more transparently. The link between these elements is not clear.
- The land tenure situation should be analyzed more thoroughly and opportunities to contribute through this programme to necessary reforms should be reflected.

- Instead of large-scale reforestation, adapt and adopt “Farmer Managed Natural Regeneration” as a more promising and lasting practice (excellent experiences in Niger).
- Consider joining African Forest Landscape Restoration Initiative: afr100.org, a multi-actor, African owned and country-driven effort to bring 100 mio hectares under restoration by 2030.
- With regard to improved utilization and recycling of biomass and organic waste, priority should be given to generalized application of mulch and compost at scale rather than experimentation with biogas and other technologies difficult to scale-up.
- Stronger emphasis could be placed on reinforcing the capacities of technical services and local government/territorial authorities to better manage agricultural land forest and fisheries areas.

26. Mongolia: Ensuring Sustainability and Resilience (ENSURE) of Green Landscapes in Mongolia – UNDP - GEF ID = 9389

✓ Canada’s Comments

- We suggest that the information on REDD-plus readiness activities (page 10) be updated.
- The proposal talks about options to operationalize better management of rangelands and forests (pages 11 and 12). Additional detail on what the project will do to help improve the management of rangelands and forests is requested.
- It is unclear how “integrated green development planning” will address the drivers of rangeland and forest degradation. Rangeland and forest degradation in Mongolia appears to be a classic “tragedy of the commons” that requires either a community-based or rights-based management and control system. Will the proposed community-based pasture and forest management units achieve this?
- We note that component 2 (page 12) also mentions ecosystem restoration. While important, the project should focus on first addressing the main causes of degradation. If not, restored ecosystems will simply be degraded after.

✓ Germany’s Comments

Germany requests for the following projects that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:

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

- Regarding project output 2.1: Since 2002 the Mongolian Governments did not finalize and pass the Pasture Law, which is considered as a pre-condition for successful implementation of sustainable pasture management. In absence of the pasture law, livestock population has increased from 20.000.000 to 70.000.000 heads of cattle since 2010. Approving the national Pasture Law and the pasture regulations for the Law on Protected Areas is decisive for the successful implementation of the proposed project. We therefore suggest that the final project proposal reflects this appropriately. The missing conducive “legal framework” should be added as a fourth barrier to sustainable pasture management in the project justification.
- Project output 2.2 focuses on rehabilitation of degraded forests. However, even intact forests have significant risks of increased natural degradation processes caused by pests and / or fires in case of the lack of sustainable forest management activities. We therefore suggest including preventive measure such as support for sustainable forest management practices in not degraded forests.
- The project justification builds on over-exploitation of forests as main reason for their degradation and could benefit from using updated information provided by the latest National Forest inventory. Whereas the PIF states that legal and illegal logging cause over-exploitation, the recently published National Forest Inventory concluded that, at least for the northern Taiga forest, non-protected forests are underused and degradation of forests is caused by the lack of sustainable forest management rather than by (illegal) logging. Furthermore, the National Forest Inventory states that fuel wood consumption is not a main reason for forest degradation, because about 90 % of fuel wood is collected from standing dead wood. It shows that the Mongolian Taiga Forest could produce in a sustainable way more fuelwood than the Mongolian population might consume. We therefore request that the final project proposal will be based on the updated information using the National Forest Inventory. Along these lines also Output 3 “Community livelihood enhancement to restore and sustain biodiversity and ecosystem services”: should be revised according to recent data, regional needs and potential for income generation for local communities.

27. Nepal: Integrated Landscape Management to Secure Nepal’s Protected Areas and Critical Corridors – WWF-US - GEF ID = 9437

✓ Canada’s Comments

- We agree with the STAP that this project builds on long experience in community-based buffer zone/corridor management, and recognizes the need to strengthen governance and technical resource management by communities.
- Could additional information on how the proposed project aligns with the REDD+ program developed by Nepal in the Terai Arc Landscape with FCPF support be provided?

✓ Germany’s Comments

- Germany approves this project.

28. Rwanda: Forest Landscape Restoration in the Mayaga Region – UNDP - GEF ID = 9385

✓ *Canada's Comments*

- We support the STAP recommendation that the generic description of each activity be replaced by a scientific and technical description of exactly what it is, and an assessment of the technical, social and economic feasibility and cost/benefit of the large number of proposed interventions.

✓ *Germany's Comments*

- Germany approves this project.

29. St. Vincent and Grenadines: Conserving Biodiversity and Reducing Land Degradation Using a Ridge-to-Reef Approach – UNDP - GEF ID = 9580

✓ *Germany's Comments*

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

Germany welcomes this project initiative to conserve biodiversity and land degradation using the ridge to reef approach. This project is comprehensive in scope and addresses the development of the framework for improvement of governance and human capacity for conserving St. Vincent genetic stocks. It is particularly important since it will work towards baselines and characterization of biological resources for St. Vincent and the Grenadines. These data sets will be critical for enhancing planning, policy formulation and decision making towards the conservation of St. Vincent and the Grenadines genetic resources.

Notwithstanding Germany has the following suggestions for improvements in the final proposal:

- Overall, the scope of the activities is generally very broad and the final proposal should clearly state milestones and timelines for the deliverables.
- For the outcome of the project to be realized, it is necessary that regulation and acts that support the development of protected areas are amended and passed into law. In order for this to occur, Cabinet's approval is required. The project proposal states that any issues impeding Cabinet approval and the legal process will be addressed through draft regulations amended as needed. The final project proposal should elaborate how the project will deal with the risk of possible delays in these processes.

- Under the Gender Equality and Women’s Empowerment section of Component 4, there is some vagueness as to the specific capacity initiatives that would be required, the target groups and the timeline over which these would need to be implemented. These need to be more thoroughly addressed in the final draft version.
- The proposed project does not clearly identify post implementation funding sources to keep components of the projects such as the land use data base and BD and SLM Tracking Tools and monitoring programmes active and updated. In order to achieve sustainable outcomes and impacts the final proposal should include a clear strategy for maintaining the developed tools and monitoring programmes. Against the background that frequent updating of information will be necessary this is an important issue to address.
- In respect to Section 3.3 (Alternative livelihood and small businesses supported) of Component 3 further clarity is needed on how the project will address and support capacity for the various farmer organizations. In the project design these questions need to be addressed in more detail.
- We suggest to review section 6 (Innovation, sustainability, and potential for scaling up.) of the document. In its present state, it is difficult to understand how the objectives for each of the three components will be met.

30. Thailand: Applications of Industry-urban Symbiosis and Green Chemistry for Low Emission and Persistent Organic Pollutants (POPs)-Free Industrial Development in Thailand – UNIDO - GEF ID = 9219

✓ *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 proposed project and considers it a very well-designed and thought-through project. Germany has only minor suggestions for improvements with regard to component 3, Output 1.5., Industry-urban symbiosis, Activity 1.5.3. Germany recommends demonstrating exchange between industrial parks and neighboring urban areas with specific focus on household waste management. Germany furthermore suggests specifying and explaining more in-depth the green chemistry technologies that will be introduced as part of this activity. The targeted technologies should ensure a proven good practice quality level. With regard to the stakeholders involved, Germany welcomes the objective of the project to develop academic curricula to ensure long-term capacity-building. Germany recommends (in line with the STAP Review) to broaden the academic stakeholder group beyond one university (as listed as of now) to ensure a country-wide academic embedment with a much broader outreach.

PROGRAMATIC APPROACHES

31. Regional (Ghana, Kenya, Senegal, Tanzania, Zambia, and Regional) : EHPMP – Environmental Health and Pollution Management Program in Africa – World Bank - GEF ID = 9444

✓ Germany's Comments

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

- This project proposal has undergone major revisions. The revised version of the PIF demonstrates a much more coherent framework and linkages between objectives and subsequent outputs/activities. Germany generally supports the remarks by the most recent STAP Review, especially with regard to the following points:
 - Inflow of e-waste/End-of-pipe technologies: Suggestion to combine measures against illicit inflow of e-waste with solutions to end of life stage, i.e. develop and implement end-of-pipe technologies as well as policies and capacity building measures with regard to the management of illicit inflow of e-waste.
 - End-of-life solutions to e-waste management: Additional measures should be introduced (apart from protective equipment and monitoring) that provide environmentally friendly alternatives to the practice of open burning of e-waste.
 - Environmental benefits: The environmental benefits of the programme are of much greater scope than reflected in the document so far. Thus, the full potential of the programme regarding the reduction of ODS, subsequent health issues as well as food risks need to be taken into account and if possible, monitored.
 - Regional Component: Germany welcomes the regional approach of the programme, especially regarding aspects of knowledge exchange and policy dialogue between stakeholders and prospective development of programmes in that region.
 - Awareness-Raising: The approach to focus on drivers of behavioral change for the development of communication tools to raise awareness on health costs of pollution is highly appreciated.