



GLOBAL ENVIRONMENT FACILITY
INVESTING IN OUR PLANET

COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE GEF
OCTOBER 2016 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 October 2016 Work Program

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**OCTOBER 2016 GEF INTERSESSIONAL WORK PROGRAM:
COMMENTS FROM COUNCIL MEMBERS
(REFERENCE: GEF/C.51)**

BIODIVERSITY

1. Brazil : Sustainable, Accessible and Innovative Use of Biodiversity Resources and Associated Traditional Knowledge in Promising Phytotherapeutic Value Chains in - UNDP - GEF ID = 9449

✓ *USA's Comments*

- The global environmental benefits that would result from this project are not immediately clear, although we note that there are global benefits from conserving Brazil's biodiversity.
- The degree to which Brazil has found private sector and university partners for taking on this work is not clear, however. This will be critical if the products are to be successfully developed and marketed. The proposal generally talks about incorporating representatives from these sectors but does not identify specific companies or university partners and instead only names government agencies. Similarly, it is not clear that the government agencies have established relationships with the indigenous communities with whom the agencies want to work, and without these relationships the project will likely not be successful. The proposal could be strengthened if these groups were already identified and it was clear that the Brazilian government had buy-in from members of the private sector, academia, and indigenous communities.

2. Cuba : Introduction of New Farming Methods for the Conservation and Sustainable use of Biodiversity, Including Plant and Animal Genetic Resources, in Production Landscapes in Selected Areas of Cuba - FAO - GEF ID = 9435

✓ *Germany's Comments*

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

- In compliance with the recommendations of the STAP review, Germany has no further comments regarding improvements.

✓ **Japan's Comments**

- Japan will support this project because the integration of conservation and sustainable use of biodiversity in production landscapes are quite important matters for island country such as Cuba, with rich in biodiversity and unique ecosystems composed by thousands of islands, wetlands, mangroves, and mountains.
- The application of the labelling scheme; Geographical Indication (GI) is innovative in rural area of Cuba. The outcome of this approach, especially for effects to communities, is awaited.

✓ **USA's Comments**

- The overarching objective and organization of the proposal should be refined moving forward. The proposal seems to focus on boosting agricultural production in Cuba, rather than preserving biodiversity. While the project may reduce the need to convert more protected lands into agricultural production and there is a clear benefit to preserving and enhancing the genetic diversity of agriculture in Cuba, the global environmental benefits should be made more explicit. In addition, the project would be improved if FAO could demonstrate how Component 1, which includes the catalogue of plant genetic diversity, relates to or supports the other components of the project. The catalogue will focus on species listed in annex III, but will these species also come into play in the interventions at three project sites under Component 2? The proposal would be more compelling if it included references to the contribution of plant genetic diversity and biodiversity/ecosystems to food security. In addition, the context description, specifically the threat of agricultural systems to biodiversity, should be made clearer. Additional documentation (i.e. references) to support the activities planned in many of the sections of the proposal are needed. The proposal does, however, make clear links to relevant conventions, which the United States supports.
- Some parts of the proposal suggest large-scale monoculture operations are decreasing and other parts suggest they are increasing. If they are increasing, then that justifies the proposal, but renders the proposed activities ineffective. If they are decreasing, then that may mean the proposed work is less relevant, but the activities would be appropriate. We hope FAO will clarify this in the project document.
- From our view, the statement on page 14 about the Geographical Indication (GI) is not entirely accurate. GI protection is often based on official registration that confers exclusive rights of use to GI producers who conform to the standards associated with the product. The authors seem to imply that once a GI is established that farmers will automatically benefit, but this is not always the case. Marketing and packaging also play an essential role in attracting buyers that are willing to pay for GI products, so this might need some more consideration, especially since it is presented as one of the project outputs.
- As this proposal is developed, the methodology that will be used to tackle the broad

barriers discussed in Component 1 should be further refined. Additional details on the approaches and procedures to be used to address barriers should also be provided for Component 2. For example, the “Save and Grow” approach is mentioned several times throughout the proposal. Save and Grow is indeed an ecosystem approach to agriculture that aims at improving productivity while conserving natural resources. However, this approach draws on decades of research in areas such as minimum tillage, timing and methods of planting, use of biological control agents, crop rotation, mulching, manure, composting, and fertilizing, usually for implementation by small-scale farmers. It is not clear from this proposal if “Save and Grow” approaches are already available for the wide range of crops, forest species, and animals mentioned in the proposal. Plant breeding programs to develop high yielding and adapted varieties, germplasm collections from where genes will be obtained for breeding programs, and extension work for technology transfer are absent from this proposal but are essential components of “Save and Grow” programs. We hope such activities will be considered as this project is developed. Co-financing of other projects mentioned in this proposal for this Component does not warrant implementation of “Save and Grow” approaches, much less on a short term basis.

- In Component 3, the FAO should continue to address how the associated laws will be created and enforced, as well as how they will overcome the barriers outlined on Page 9 of the proposal.
- We are pleased at how the proposal outlines the collaborations and stakeholder engagement envisioned. However, additional consideration should be given to the following: the project should further include youth groups as the proposal states that young people are leaving rural areas to cities for a better life. The project may also benefit from increased collaboration with universities and academic/research institutions engaged in this type of research; The proposal notes that women’s groups will be included in the full project preparation process; however, those groups are not identified in the proposal. Finally, this proposal may benefit from coordination and knowledge sharing with a similar project that has been funded in Ecuador (GEF Project #4777).
- With regards to project financing, it is unclear whether GEF funding will be allocated to a specific part of the project or whether it will be spread among the project objectives. Although the project leverages significant matching from partners, we believe the proposal would benefit from additional details on how the project will be sustained beyond its 48-month duration. We believe the FAO should also elaborate on how the project will be assessed upon its completion, as well as how lessons learned will help improve project activities. Furthermore, the project proposal notes that trends in public awareness and attitudes in support of biodiversity will be a measure of success—how will these trends be measured?
- While climate change is discussed in several places, it would be helpful for the FAO to provide additional details on how climate change will affect the project, as well as how risks might be mitigated. The FAO should also take into account the effects that changes in international trade restrictions might have.

3. Mauritius: Mainstreaming IAS Prevention, Control and Management - UNDO - GEF ID = 9553

✓ **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 supporting the implementation of the Nagoya Protocol on ABS and of the 2015 Brazilian ABS framework. The proposed project builds upon the innovative system of “local productive arrangements” (LPA) which are proven to support local socio-economic development. LPAs were highlighted by the Government of Brazil at the G20 Summit in 2015 as crucial instrument to enable feeding a population of 200 million people through local food production. It appears to be very promising to develop ABS compliant phyto-pharmaceutic value chains based on national genetic resources and associated traditional knowledge with the involvement and Prior Informed Consent of indigenous peoples and local communities in the context of these LPAs.

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

- Germany recommends to clearly identifying whether and how Indigenous and Local Communities (ILCs) are currently involved in the socio-economic activities in Local Productive Arrangements (LPAs). It should further be explained whether ILCs have been involved in the project development and already expressed their need and willingness to participate in the suggested development of phytotherapeutic value chains. Since the *Prior Informed Consent of ILC is a necessary prerequisite for the utilisation of associated traditional knowledge held by ILCs according to the Brazilian ABS law*, it will be crucial for the success of the project that ILC support the basic concept of the project. If ILCs have not yet been involved, the proposal should include a greater initial focus on awareness raising activities and creating ownership amongst ILCs.

✓ **Japan's Comments**

- It would be important for an Invasive Alien Species management to eradicate target species intensively in the case of Island ecosystem, so we would like to know the details of the strategies.

✓ **USA's Comments**

- We are pleased that this proposal aligns with the goals of the Convention on Biological Diversity and that it will establish an important framework for coordination on Invasive Species Response. However, with the past funding from the GEF and the acknowledged emphasis on preserving biodiversity, it is unclear why an “apex agency” is not already at work.

- The project implementers should give greater consideration to how the project will engage with industry and how they will manage any perceptions about the project interrupting economic opportunities Furthermore, additional consideration should be given to how the project will be sustained when the GEF grant is complete.
- In terms of labor standards, the United States is concerned that the project does not appear to take into account potential risk for child labor or forced labor.

4. Papua New Guinea: Sustainable Financing of Papua New Guinea’s Protected Area Network - UNDP- GEF ID = 9536

✓ **Germany’s Comments**

Germany approves the following PIFs 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 concurs with the comments made by the STAP specifically to put greater emphasis on supporting and financing Community Conserved Areas as part of the national Protected Area network and to follow a needs-based approach when setting up the institutional frameworks for the Protected Area Network of PNG. Embedding protected areas in their surrounding landscapes and ensuring their contribution to sustainable livelihoods via appropriate governance structures as well as through sustainable financing strategies including diversification of funding sources are key factors to be concretized in the final project document.

✓ **Japan’s Comments**

- For the management addressing climate change of protected areas, it would be recommended to consider ecosystem based on adaptation. So from the standpoint, we would like to know the details of the project.

✓ **USA’s Comments**

- The United States welcomes the efforts of this proposal to conserve Papua New Guinea’s rich biodiversity and build institutional capacity. However, the United States has concerns with the language on biodiversity offsets: “For example, with the growth of large-scale projects in the agriculture, forestry, hydro-electric, infrastructure, mining and petroleum sectors in PNG, there are good prospects to implement compensation and biodiversity offset mechanisms that could finance conservation areas in order to achieve ‘no net loss’” of biodiversity from investments.” The approval of this project does not indicate support from the United States for future Multilateral Development Bank (MDB) projects with impacts in critical habitats. Those must be evaluated and considered individually.

- On page 13 of the latest PIP submission, the proposal states that the project implementers will clarify “the access and benefit-sharing (ABS) arrangements.” However, Papua New Guinea has not yet signed or ratified the Nagoya Protocol. It would be helpful if UNDP could clarify this point. In addition, the proposal includes a footnote about being CITES-compliant with captive breeding of listed butterfly species; such efforts should also be indicated for the CITES-listed crocodiles they propose ranching.
- With regard to stakeholder engagement, the Secretariat of the Pacific Regional Environmental Programme (SPREP) has a regional program on Biodiversity and Invasive species, and this program could both benefit from and contribute to this initiative. The Pacific Community (SPC), too, could benefit.

CLIMATE CHNAGE

5. **Egypt: Egyptian Programme for Promoting Industrial Motor Efficiency – UNIDO - GEF ID = 9423**

✓ Canada’s Comments

- Canada supports this project and positively notes the sizeable co-financing from the private sector, including loans from local financial institutions, and grants from the beneficiary industries themselves. This is a good indication of national industry ownership.
- This proposal highlights that the Egyptian Intended Nationally Determined Contribution (INDC) includes energy efficiency as a priority. We would like more detail to be provided on how the electric motor sector is addressed in the INDC.
- We request that the proposal clarify how the project will achieve the conversion of old motors for new, more efficient motors, particularly without implementing an incentive program. There seems to be a reliance on building awareness, changing legislation, and conducting feasibility studies. Unless strong justification can be provided otherwise, we suggest that some incentive program be considered.
- We request that component 3, which discusses demonstration and upscaling, provide more detail on how this upscaling will occur. We also note that the amount of resources assigned to this budget line does not seem to be commensurate with upscaling an energy service company model. We recommend that the final project proposal fully develop a demonstration and upscaling program with sufficient resources allocated to this component.
- Please provide clarification (including those listed above) and justification for estimated expected project impact of 1.92 million tCO₂e. If these figures are accurate, the project is expected to be very cost effective at \$8.75 per tonne CO₂e and could provide lessons for others.

✓ *Germany's Comments*

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

Germany endorses the general project idea, which is reflecting some of the urgent needs of the Egyptian industry and national economy: Increase of energy efficiency due to rising prices and macro-economic losses of energy waste. The topic of motors in industry is acknowledged as a good starting point. The project proposal lays the groundwork for elaborating a detailed work program, depending also on the inclusion of the multitude of relevant stakeholders in the process.

However, the baseline scenario as presented in the PIF is not reflecting, what share energy efficiency could contribute to industrial energy demand reduction. The saving of 1020% over the course of several years seems not ambitious enough.

- Germany requests that the following points be taken into account during the drafting of the final project proposal: It should be emphasized that saving electricity is not only about replacing some equipment but also dependent on including such replacement in a new framework of how to tackle energy consumption in the industry in general. In parts this is done implicitly in the PIF in the different work fields of the proposed project. However, this should be strengthened in the line of argumentation.
- CO2 mitigation costs of around 9\$ per metric ton of CO2e, which is quite high considering that no other benefits (for biodiversity, land management etc.) are reached. These mitigation costs should be clarified in the project documents.
- The project has the potential to lead to a transformative change in the industrial sector, significantly reducing electricity demand. This potential should be realized and proven to be sustainable.

6. Vanuatu: Barrier Removal for Achieving the National Energy Road Map Targets of Vanuatu (BRANTV) - UNDP - GEF ID = 9574

✓ *Canada's Comments*

- Canada supports this project and positively notes the level of co-financing from the national government, which is a solid indication of country ownership
- We agree with STAP that the final project proposal should include clear data on the potential of the various renewable energies (wind, solar, biomass). Specifically, the final project proposal should indicate clearly how much renewable energy will be generated by each source, and the direct relation to estimated GHG emission reductions. This will support the estimated GHG emission reductions figures in the proposal.
- We request that additional details be provided on the activities in Component 1 relating to capacity building for the existing banks on financing low carbon

development projects. We note that while the proposal aims to build capacity with local financial institutions, it focuses the investment resources through public sector-administered demonstration projects. Please clarify why local financial institutions are not involved in delivering the investment resources.

✓ **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 approach of invigorating development in the sustainable energy sector and the focus on increasing engagement of private sector finance. The project is especially valuable in addressing national policy directions for the energy sector within the framework of the National Energy Roadmap (NERM) and strengthening the DoE's capacities. The proposal is fully aligned with Vanuatu's NDC and facilitates several mitigation actions outlined in the NDC such as the NERM, the Rural Electrification NAMA, off grid renewable energy projects and energy efficiency measures. For off-grid applications and in the absence of institutional arrangements for operation and maintenance of energy systems, governance and management systems (e.g. fee collection systems) this project will be addressing a key gap. A focus on high-rotation biomass combustion energy systems in the design would be appreciated.

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

- Development of a 'marginal cost of abatement curve' to drive the least cost /highest return path toward achieving the CO2 abatement target. A similar curve could be created purely toward driving progress for the 65% RE target.
- Consider the risk of over-ambitiousness in the given time-frame with regards to the soft enabling aspects (policies, legislative changes, regulatory instruments) and with regards to the availability of co-financing.
- Funding may also be needed for GIS mapping exercises, as these are required to identify the size of communities and the distance between households, and can also feed into a least cost/proportionality driven approach toward the rural electrification targets.
- The proposal would benefit from outlining the RE low Carbon policy directives mentioned in the National Climate Change & Disaster Risk Reduction Policy or new National Sustainable Development Plan.
- The proposal would also benefit from depicting the contribution of the EU-GIZ ACSE project and the recent GIZ-supported [pilot of tourism private sector RE engagement](#).

✓ USA's Comments

- The United States is pleased at how this project aligns with regional priorities, and that the proposal will assist with the development of Vanuatu's national priorities and plans with respect to renewable energy policy. However, the United States has several concerns that it recommends be addressed moving forward. In general, more contextual information about the environment in Vanuatu should be provided, as should a brief historical description of the relevant barriers. In addition, the United States agrees with STAP's concerns that a stronger methodology in measuring the reduction in emissions will contribute to more concrete results.
- UNDP should incorporate the lessons learned from several GEF projects that supported sustainable energy deployment in the South Pacific. While it is noted that the country lacks training for technical support of renewable energy installations, a plan to support renewable energy technical education for local employees should be included.
- The project framework does account for some of the potential risk. However, the overall project risk is identified as "medium," with "lows" associated with the possibility for a reduction in government support, government-inflicted delay, and community support. However, as the DOE MCCND is providing a substantial portion of the total costs, the "low" risk rating for a reduction in government support seems like an underestimate. The United States also believes it is important for UNDP to include information about how disasters, such as a cyclone, will be overcome or managed in terms of interruptions to the longevity of the investments. Furthermore, consideration of managing the potential indirect land use changes associated with the project could likely be incorporated and enhance the project, as it is dealing with an insular, limited land mass geography.
- In terms of project finance, the largest portion of funding, in both co-financing and GEF request is for Component 4 and 5 under "Inv." These activities are stated as building a campaign, developing financing models and schemes with partner institutions, demonstration/pilot off- & on-grid projects, and project portfolio development. These activities depend upon technical assistance (TA) outcomes. It is important for UNDP to consider how these activities will be carried out should any of the TA outputs not be met.
- With regard to stakeholder engagement, the Pacific Community (SPC), currently involved in the Government of Vanuatu's Mandatory standards and labelling system (MEPS) initiative, could contribute to and benefit from greater involvement in this proposal. More specifics on private sector engagement should be provided as well. Finally the United States would like to request that information be added on how indigenous populations will be incorporated in the process of self-determination of community needs and incorporation for future plans.

INTERNATIONAL WATERS

7. Regional (Chile, Peru) : Catalysing Implementation of a Strategic Action Programme for the Sustainable Management of shared Living Marine Resources in the Humboldt Current System (HCS) - UNDP - GEF ID = 9592

✓ 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 proposal. Addressing post-harvest losses and increasing the availability of fish products for local consumption as well as improving the local value addition in the fisheries sector are sound and proven to work approaches. A high priority on alternative livelihoods for small-scale fishers is seen as crucial for the project's success. Generally aquaculture has an interdependence with wild catch fisheries, due to its need of fish feeds and its environmental impact on the marine ecosystem (e.g. runoffs, use of antibiotics, mariculture farm-fish escapes). Integration of the promotion of sustainable aquaculture is recommended for the project context.

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

- The Introduction of Coastal and Marine Spatial Planning (CMSP) in Peru is also an integral part of the project design "Regional Coastal Fisheries Initiative-Latin America" (GEFID: 9124). Any description on how both projects aim to gain synergies and avoid double funding would be appreciated.
- Germany recommends that the project documents stress that they are 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)
- Germany recommends that the project actively seeks for more synergies gained from aligning the activities with other international projects in the region, such as the KfW project "Protected Area Programm coastal and marine protected areas III (PAN III)" and the GIZ project "Sustainable Use and Protection of natural Resources in Peru (ProAmbiente - 2012.2216.5)"

✓ USA's Comments

- The United States supports the Humboldt Current System Strategic Action Programme (SAP) implementation project, which builds upon the highly successful work of the foundational Humboldt Current Large Marine Ecosystem (HCLME) initiative.
- The project PIF, and project components within, is well thought out and articulated,

and demonstrates a clear vision and path forward for continued cooperative progress towards sustainable management of shared living and non-living marine resources and the sustainable provision of goods and services through application of ecosystem-based approaches.

- The United States is pleased that through the Humboldt Current System SAP implementation project, in which the United States National Oceanographic and Atmospheric Administration (NOAA) anticipates a continued partnership, the coastal and marine spatial planning (CMSP) activities piloted in the HLMCE initiative will continue in Ica, Peru, and will be coordinated with the regional GEF Coastal Fisheries Initiative project. Chile has also expressed interest in building similar capacity for CMSP which will extend the approach across both HCLME project countries.
- In addition to the strong push for CMSP work captured throughout the proposal, the United States supports the broader-scale objectives and proposed activities to achieve the project objective for the “sustainable and resilient delivery of goods and services from shared living marine resources, in accordance with the SAP endorsed by Chile and Peru.” This includes their well-defined focus on applying an integrated ecosystem-based approach to management and project priorities related to anchoveta, sustainable fisheries, bycatch, biodiversity, and employment and food security, as well as issues related to coastal infrastructure, water quality, and mining (among others) that all influence the sustainability and resilience of coastal ecosystems and community livelihoods.
- The United States also supports the project’s recognition of and identified contributions towards achieving the Aichi biodiversity targets.
- We note the extensive strategic partnerships that have been developed and formalized in the SAP development phase that will bring strong expertise and capacity to the SAP implementation project. These diverse partnerships, many highlighted in the PIF (e.g. NGO, National and Regional Government, Foundations, Private Sector, and UN), are likely to grow during the SAP implementation phase and serve as a critical foundation to ensure the long-term sustainability and stability for ecosystem-based management of the HCLME. Furthermore, the project is in line with a COP20 Environmental Protection Agreement signed between Peru and Chile and with the Sustainable Development Goals signed by both countries. The bilateral agreement between Peru and Chile, signed during COP20, will help sustain the program. The diversification and value added to fisheries will help lead to the program’s broad adoption, creating productive opportunities inside and outside the fisheries sector with people organized and integrated.
- The United States is pleased that project’s risk analysis considers different potential risks and provides sufficient mitigation measures. The project will also promote economic growth and development, but could raise an economic concern if the alternative activities are not scaled up fast enough to supplement lost income due to fishing restrictions.

- In addition, as CSMP generally involves a public process including indigenous peoples, better articulation of the public process should be included.
- As the proposal is further developed, greater consideration should be given to how the project will be sustained once the GEF grant is finished. However, the level of diverse partnerships, the existing bi-lateral Environmental Cooperation Agreement that went into effect in 2014, and other national and regional elements of the project indicate relevant and appropriate mechanisms that could support post GEF-grant sustainability.
- Finally, to the extent that the project involves workers hired on short-term contracts, proper safeguards should be in place to ensure that this contracting scheme is not used to violate workers' freedom of association.

8. Regional (Malawi, Tanzania): Strengthening Trans-boundary Cooperation and Integrated Natural Resources Management in the Songwe River Basin - AfDB - GEF ID = 9420

✓ *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 promotion of a transboundary Integrated Water Resource Management (IWRM)-project in the Songwe River basin. The holistic approach enables a long-term improvement for the local population of both states under environmental-friendly conditions. The introduction of seasonal aquaculture and small-scale Hydroelectric Power Plants (HPPs) into small-scale water and soil harvesting rainwater retention basins can relieve overexploitation of aquatic resources and promote local income regeneration. Simple management and “low-tec” technology-mixes have the potential of self-multiplication and scaling-up. Project component 1) combines all principles of IWRM in a contemporary form by deriving from a whole ecosystem perspective and seeking user group self-governance by stakeholder dialogue-platforms. Project component 2) is bridging risk management and capacity development by data and knowledge transfer. Project component 3) is implementing climate-smart agriculture, community-based demonstrations and scaling-up of an International Nature Resource Management (INRM). The introduction 4) of geo-physical and hydrological data monitoring is designed as a source for sustainable management decisions.

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

- Germany recommends identifying the not yet specified IUCN and other donor agency co-financing contributions in the full proposal. It should describe how synergies with existing projects in the region are gained and double funding is avoided.

✓ USA's Comments

- The United States believes the project activities are comprehensive and wide-ranging, and, if successful, will provide significant benefits as outlined in the proposal. The complexity of the problems tackled by this proposal is a strength, in that this project seeks to manage a complex environmental problem with consideration of the socio-economic pressures that can, and could continue if unaddressed, to exacerbate it. However, with the complexity comes the need for the involvement of project implementers from a broad cross-section of expertise and experience, both within government, as well as on-the-ground. The proposal requires additional information on how, and by whom the sub-pilot projects will be implemented, measured, assessed, and reported, and specifically how these would inform the project itself, and inform the foundation of the SRB Commission to continue the efforts beyond the project's end. This will be important for achieving the full and sustained potential of the project.
- The risks are generally outlined well, though some stated risks and plans to address them are not as clear, and would benefit from a more detailed explanation of mitigation measures planned. For example, the project implementers should address the risk of inadequate cooperation by one or both countries, as the relevant legal convention has been approved by Malawi, but not yet Tanzania. While the lengthy history of cooperation, as well as the signing by both countries of a binding MoU to establish the SRB Commission, mitigates this concern to some degree, the approval by both countries seems a crucial need for success. In addition, as the project is further developed, the risk for economic development priorities in the short term to compete against the efforts to improve long-term environmental conditions should be given greater consideration.
- Additionally, we would like to request that additional information surrounding the implementation of the sub-pilots be provided (for example, which activities will require a wide range of expertise, where the expertise will come from, and exactly how the sub-pilots will be conducted and measured). Similarly, the proposal would benefit from elaboration on the methods that will be used for monitoring, as they may be different for the varied sub-pilots given that their nature varies quite broadly. Effective monitoring will be important to the broader uptake of this project.
- The United States believes the participatory approach is constructive, in particular with the individuals living in the communities within the SRB. The poverty, food insecurity, water, and sanitation issues outlined in the proposal as significant causes of the environmental degradation of the SRB will continue unless addressed directly by highly effective participation experiences of the communities. Training and assistance, with effective monitoring and reporting of participatory programs back to the communities so they understand progress, problems, and successes, will be a key point for sustained environmental and economic gains sought by the program. On another level, economic stressors at the district and country levels could also become an obstacle to sustained success. Continued, highly effective engagement and training, along with monitoring and reporting to officials, will thus also be important

for the project's long-term viability. This will provide feedback to program implementers, as well as enhance citizens and government official's engagement and adoption of strategies and methods recommended by the project. In addition, while the project works towards broad-based stakeholder engagement, gender-disaggregated data is needed, as women are recognized as key stakeholders (page 22).

- Finally, with regard to labor standards, it is unclear if the project factored in the potential risks of child labor, per ILO conventions 132 and 182, or adequately ensures they provide sufficient risk mitigation measures with regards to project implementation.

LAND DEGRADATION

9. Lebanon: Land degradation neutrality of mountain landscapes in Lebanon - UNDP - GEF ID =9388

✓ Germany's Comments

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

Germany supports the project, which is of particular interest for the Focal Area Land Degradation being one of the first projects to explicitly address the SDG 15.3, „Land Degradation Neutrality“(LDN). This target is crucially interdependent with a variety of SDGs, such as food security, climate mitigation and the protection of water resources and biodiversity. Germany also welcomes the focus on integrated land use planning which is coherent with UNCCD approaches and on the connection of measures for rehabilitation of degraded areas with measures for dissemination of sustainable land use patterns.

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

- Germany refers to the recommendations of the STAP to enhance the project design, particularly the stronger embedment in the national LDN.

✓ USA's Comments

The United States would like to recommend that UNDP coordinate this proposal with the following, related activities:

- United States Agency for International Development (USAID)'s *Lebanon Reforestation Initiative*. This initiative works with local communities and nurseries to grow and plant native tree species around the country.
- The U.S. Department of State, Bureau of Oceans and International Environmental and Scientific Affairs recently approved and is collaborating with the Middle East

Partnership Initiative (MEPI, specifically George Aldridge) to fund a study of flora and fauna biodiversity in Lebanon. It will mostly survey native fauna and should provide data on how native wildlife impacts trees and other plants. The data would prove useful for further conservation efforts, including this proposed initiative.

MULTI FOCAL AREA

10. Global: GEF Small Grants Programme - Sixth Operational Phase (Part II) - UNDP - GEF ID = 9209

✓ Germany's Comments

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

Germany welcomes the documents on the GEF Small Grants Programme.

- Concerning page 1; Project Outcome 1.1: Germany rejects a management of marine ecosystems. This is also excluded through the EU Marine Strategy Framework Directive and the corresponding ecosystem approach. Therefore the impact of project activities on human activities impacting the marine ecosystems in the project area should be further detailed.

✓ Japan's Comments

- As Japan has supported Critical Ecosystem Partnership Fund (CEPF) as one of donors, partnership with CEPF and other programmes are welcomed. In addition, to achieve “Community Landscape and Seascape Conservation” in OP6 SGP, building on the experiences of COMDEKS and other existing Initiatives also could have a positive impact on the project.
- For scaling up SGP, good collaboration with international partners such as the International Partnership for the Satoyama Initiative (IPSI) would contribute to generate good results.

✓ USA's Comments

- In the Local to Global Chemicals Management portion of this Small Grants Programme (SGP) tranche, the United States would like to suggest partnering with UNEP, given their role as the primary international organization with chemicals and waste management expertise. UNEP has expertise with artisanal and small-scale gold mining (ASGM) projects, and is the host body for the Global Mercury Partnership ASGM focus area. In addition, the focus on e-waste recycling and open-burning should be re-framed so that it focuses on Convention implementation. General e-waste work and work on lead acid batteries and copper are outside the scope of the

Stockholm and Minamata Conventions.

- Regarding local certification of products, how would the proposed local certification systems link to regional or global standards and systems?
- In the description of ASGM communities within hotspot countries, how many hotspot countries will be involved in this program? While this kind of work is important, stand-alone pilots may be very expensive. The reduction of mercury usage in ASGM communities is very important, but perhaps the SGP could coordinate with other GEF-financed pilot plant projects that do complementary activities, such as small business start-ups to import or manufacture the mercury-free processing equipment. The proposal also mentions that “private sector business, which would be most likely to have strong influence on the control of mercury in artisanal gold mining” will be an important partner for SGP in OP6. Can the private sector really control mercury in ASGM? Finally, with regards to the mention of support from newly organized or existing coalitions, which existing coalitions will be drawn upon? It would be useful to understand how much of this work is new and what resources currently exist.
- For the portions of the SGP that will support low-carbon energy access, UNDP should be careful to account for social and environmental risks when deploying small hydro, bioenergy, and efficient stoves.
- With regard to the language on elimination of chemicals, the United States Department of Agriculture supports both organic agriculture and conventional farming practices, and would encourage prudent use of pesticides, proper disposal of obsolete pesticides, and the phase-out of highly hazardous chemicals (HHCs) and persistent organic pollutants (POPs). Given challenges of invasive pests and the need to utilize pest control tools to maintain climate resilience, there are some agro-ecological conditions where organic production methods are not feasible. In these cases, a focus on good management practices is recommended. Furthermore, open burning is mentioned with regard to solid waste, but agricultural open burning is not addressed. This seems like an opportunity UNDP might explore, especially if there is a SGP technical focus on biogas digesters and cook stoves, i.e. agricultural residues as feedstock.

11. Eritrea : Restoring Degraded Forest Landscapes and Promoting Community-based, Sustainable and Integrated Natural Resource Management in the Rora Habab Plateau, Nakfa Sub-zoba, Northern Red Sea Region of Eritrea – UNDP - GEF ID = 9266

✓ *Germany's Comments*

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

Germany approves the PIF, acknowledging the high importance of this topic and respective interventions, since Forest Landscape Restoration potentially contributes to the

implementation of UNFCCC, UNCCD and CBD at the same time. The project documents are well designed and clearly articulated.

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

- **Tenure security** is a precondition for long-term community engagement: the communities should have clearly defined Use Right and Responsibility and agreed on restrictions on excessive use of the resource. The program needs to address these issues through the engagement of responsible institutions, in this case cross sectoral engagement. This issue is reflected in the PIF, but needs to be supported by focused activities.
- **Access to alternative energy supplies:** as in other parts of Africa, biomass is an important source of energy for communities. This will be further exacerbated by the population growth. Hence, the program needs to take into account the provision of alternative energy sources or energy efficiency technologies. This also needs cross sectoral engagement.
- **Establishment of multi-stakeholder platforms at different levels** which oversight the program implementation could be considered in the document. These platforms could be important grounds for multi-stakeholder participation and engagement and ensure institutional development. This is an important aspect for sustainability and would need allocation of appropriate (additional) funding.

✓ **Japan's Comments**

- To success this integrated ecosystem program, component3 "Reduction of pressure on ecosystems through income generation and funding mechanisms" is one of the most important objectives in this project such as technical assistance for local producer and groups (e.g. Famer Field School approach).
- Japan has supported "Community Development and Knowledge Management for the Satoyama Initiative Programme (COMDEKS)". COMDEKS has many experiences for community-based management in 20 countries, therefore utilization of lesson learnings from COMDEKS is highly recommended.

✓ **USA's Comments**

- We appreciate that this project properly aligns projected outcomes with specific Aichi targets and aims to tackle land degradation issues through much-needed reforestation.
- The community-led, bottom-up approach to conservation efforts seems constructive, as do the goals to mainstream scientific and sustainable management practices. However, more information on how the project will be managed on the ground should be provided, to avoid the risk of constructing "paper parks."
- With regard to labor standards, it is unclear if the project factored in the potential

risks of child labor, per ILO conventions 132 and 182, or adequately ensures they provide sufficient risk mitigation measures with regards to project implementation. In addition, the project implementers should ensure that only children of legal working age are employed. UNDP should also ensure that if children are employed at all it is in non-hazardous environments and that all workers are paid and not forced to work. More specifically:

- The project plans to use the manpower of project beneficiary communities for landscape restoration activities (sections on pages 5, 10, 20) and it is unclear if beneficiaries will be protected from subjection to forced labor.
- It is unclear if or how the project will ensure that children are not forced to work on environmental conservation activities as part of the “in-kind” contribution of project beneficiary communities.
- It is unclear whether environmental conservation is an activity conducted under national service. The “in-kind” participation of beneficiary communities could be considered a civic obligation, which is excluded from the legal definition of forced labor.

12. Mauritania: Integrated Ecosystem Management Program for the Sustainable Human Development in Mauritania – UNDP - GEF ID = 9294

✓ 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 requirements are taken into account during the design of the final project proposal

- The achievement of the indicated project outcomes and outputs of this complex and ambitious project depends on the indicated co-financing amounts. Therefore Germany would like to stress that in the course of preparing the final project document, the availability of the indicated co-financing amounts of the 3 Ministries (Agriculture, Water, Environment) of 21,950,000 USD should be reassessed and confirmed by the Mauritanian Government (Ministère de l'Économie et des Finances).
- The mechanisms and the roles and responsibilities of the different stakeholders (in particular of the co-funding ministries) regarding steering and coordination of the project should be described in more depth and the availability of necessary corresponding resources should be reassessed and confirmed in the final project document.
- The project is very complex with a high demand for coordination and cooperation within and between the ministries as well as with their attached agencies, decentralized services, civil society and others. Effective intersectoral coordination by the Mauritanian government, especially by the Ministry of Environment is therefore a

prerequisite for the project's success. However, Germany has doubts if key actors, such as the Ministry of Environment, are participating in the multi-sectoral platform mentioned under Component 4./Point 5/Page 18. The final project document should therefore elaborate more precisely on the roles and responsibilities of the institutions involved in the project.

- The further preparation of the project could benefit from a thorough stakeholder analysis to verify the completeness of the stakeholder list and contribute to the above mentioned definition of roles and responsibilities of the stakeholders in the proposed project. In the PIF the Ministry mandated for land use planning (Ministère de l'Habitat, de l'Urbanisme et de l'Aménagement du Territoire) does not appear in the list of relevant stakeholders. Germany suggests including this ministry in the planned project.
- Furthermore, several development cooperation projects are already working in the proposed intervention regions on similar topics. Therefore, the final project document should outline how coordination with these projects will be established to avoid duplication and ensure synergies. Along these lines, the coordinating role of FAO should also be defined more clearly in the final project document.
- The description of the situation under Part II.1.1)a. "Lack of an integrated and ecosystem-based approach supporting sustainable human development" needs to be reconsidered in preparation of the final project document. It should be indicated how the project will build on existing experiences and results of existing projects underway establishing an integrated and ecosystem-based approach. Those are for example
 - ❖ The German TC programme "Natural Resources Management" which developed an approach for participatory/decentralized natural resources management focusing on silvo-pastoral areas which is inscribed since 2012 in the 2nd National Environment Action Plan (NEAP / 2012-2016) and scaled-up by other projects of Worldbank, EU, IFAD, Small Grants Programme/UNDP;
 - ❖ The German TC and EU co-funded project "Strengthening Capacities for Adaptation to Climate Change in Rural Areas" (not mentioned in the PIF but STAP Review mentions under Point 2 its climate change vulnerability assessment);
 - ❖ The Adaptation Fund/World Food Programme project "Enhancing Resilience of Communities to the Adverse Effects of Climate Change on Food Security in Mauritania" (not mentioned in the PIF) among others.
 - ❖ FAO already supported a watershed management project whose results are also not mentioned.
- The National Plan for Agricultural Development (2015-2025) which was strongly supported by FAO should also be mentioned as the Ministry of Agriculture is a main stakeholder of the planned project. So far the project is not included in the available final draft of this national plan which generally shows a high financing gap. In this light intended cofinancing amount by the Ministry of Agriculture should be reassessed in preparing the final project document.

- Given the generally rather limited technical capacities at national level the project could benefit considerably through including international technical support for specific topics. According to experiences gained in bilateral Mauretanian-German technical cooperation, international expertise could be especially beneficial related to setting up new protected area including institutional arrangements for management and capacity building of PA staff. This option should be considered in the preparation of the final project document.

✓ **USA's Comments**

- In terms of labor standards, the United States is happy to see efforts made to target poverty alleviation, to improve alternative livelihood opportunities, and to increase income-generating activities. The United States is also happy to see that the project is taking a participatory approach, particularly with regards to rural farmers. However, we are concerned about the lack of acknowledgement of hereditary slavery, a key driver of poverty in Mauritania.
- The project approach should take precautions to ensure that conditions of slavery are not perpetuated by this project. FAO should determine what is meant by 'participatory' in advance of implementing initiatives. The issues of slavery and forced labor in Mauritania have been increasingly called into question by the international community and by NGOs within Mauritania. More information on the situation of slavery/ haratines can be found in the State Department's Country Report on Human Rights:
<http://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm#wrapper>
- In addition to slavery, child labor, especially in its worst forms, is a factor that contributes to recurrent poverty and marginalization. The project approach should take precautions to ensure that the worst forms of child labor are also not perpetuated by this project.

13. Mexico: Sustainable Productive Landscapes – World Bank - GEF ID = 9555

✓ **Germany's Comments**

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

The focus and approach of the project have proven to be a useful concept for Mexico. The project can be instrumental to generate awareness among stakeholders in Mexico on sustainable and yet productive agricultural development pathways.

The importance to provide adequate resources for territorial planning as well as for the establishment of incentive systems for sustainable production in agriculture and forestry is rightly emphasized.

Nevertheless, component 3 remains rather vaguely described.

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

- Germany recommends integrating outreach and a robust monitoring of impacts as important elements of the project proposal.
- As Mexico is part of the global “Target Setting Programme on Land Degradation Neutrality”, reference to this programme should be included in the project proposal.
- As mentioned in the STAP Review, monitoring the effects of sustainability standards and certification on biodiversity conservation, and socio-economic development should have a more prominent role in the proposal to monitor the large-scale impact within the 7 geographic priority areas.
- Germany suggests reviewing the indicators to be considered for the outcome on land degradation, which does not seem fit for results-based monitoring (e.g. “# of management strategies” is not a result but rather a means of implementation; “# of people trained” cannot measure the application of what has been trained).
- Indicators on land degradation should take up the standards from the international debate, measuring land degradation through a) trends in land use change, b) trends in productivity and c) soil carbon trends. In the same line of thinking, the term “climate smart agriculture” is not fit for measuring the level of ambition in terms of agricultural sustainability as long as soil health trends (carbon/biodiversity) are not taken into consideration.

✓ *Japan’s Comments*

- Japan International Cooperation Agency (JICA) has been implementing bilateral technical cooperation activities which can contribute to Mesoamerica Biological Corridor (MBC) under Project Mesoamerica (PM).
- In addition, with SICA (Sistema Integral de Control Agroalimentario), JICA is also planning a regional cooperation contributing to the MBC.
 - JICA has some projects in Mesoamerica. In order to avoid duplication of assistance and to create synergy, close coordination with those projects is highly recommended.
 - We would like to know whether the proposed activities are in line with the MBC or not. If so, we would like to know the details of the relation between the activities and the MBC.

14. Morocco: Revitalising Oasis Agro-ecosystems through a Sustainable, Integrated and Landscape Approach in the Draâ-Tafilalet Region (OASIL) – FAO - GEF ID = 9537

✓ *Germany’s Comments*

Germany approves the following PIFs in the work program but asks that the following

comments are taken into account:

The proposal highlights the fragility of oases ecosystems, and emphasizes the need to strengthen their management in order to reach more sustainable pathways. The landscape approach and emphasis on cross-sectoral exchanges between stakeholders are innovative elements. The intention to coordinate with other relevant projects is highly welcome. Nevertheless, an important number of conceptual clarifications remain to be addressed, as the review by STAP has shown.

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

- Opportunities for and pathways towards sustainable intensification of agricultural enterprises are only vaguely described. Therefore, Germany recommends placing more emphasis on improved irrigation practices, practices building soil organic matter and sound groundwater management.
- As Morocco is part of the Target Setting Programme for Land Degradation Neutrality, reference should be made to this and related national commitments.

A similar project has recently been proposed to the GCF (Development of Argan Orchards in degraded environment). Secretariat should liaise with the GCF to clarify potential overlap.

✓ **USA's Comments**

- The United States is pleased to see that this project has adequately aligned itself with the CBD and the appropriate Aichi Targets. The land degradation neutrality targets are still under development, but the approach is properly focused at the national level.
- From a labor perspective, because children often work informally in these sectors, basic training on identifying child labor and connecting those families with livelihoods and educational services should be included where possible. The United States Department of Labor (USDOL) operates a project in the rural areas of the Marrakech-Tansift-Al Houz region that seeks to connect families at risk for child labor to government and NGO livelihoods service. It would be a nice synergy for the project to be able to instruct vulnerable families on enhanced agricultural practices to boost their income and potentially decrease the risk for child labor. At a very minimum, it would be helpful for the project to work with the Entraide Nationale and labor inspectors to use its involvement in a sector with high informality to also help eradicate child labor.
- With regard to *Stakeholders* (p. 21) and *Coordination* (p. 23), implementers may want to consider formalizing these types of engagements as some sort of project steering committee or something like it to 1) increase beneficiary ownership and 2) encourage civil society contributions. As we have learned from the gender project in Morocco, there are so many different groups working on similar/complementary issues that are not provided a space for healthy exchange that does not involve competition of funds. Providing an opportunity to coordinate and facilitate with existing efforts yields much

higher returns with regard to meeting/exceeding project objectives.

- When the project implementers engage with stakeholders, they should factor in potential barriers to CSO and indigenous people's participation, including physical mobility (transportation, physical safety) and other barriers, such as lack of safe spaces to discuss politically sensitive topics where civil rights will not be violated. Will the project endeavor to involve unions to ensure that workers have the benefit of direct training? (Worker associations are not expressly listed on page 22, although there is a collective bargaining agreement in the agriculture sector for some workers.) In addition, though the proposal does note extensive consideration of gender equity, the project in its support of Plan Maroc Vert (PMV) should endeavor to find ways to not just preserve the knowledge of women and provide alternative livelihoods trainings, but give them the same knowledge and tools to assume leadership roles in agricultural undertakings, whether traditional (Pillar II) or high-productivity/modern (Pillar I). To the extent possible, it would be helpful to include (and even require) women as central figures in developing the 16 existing Plans Agricoles Régionaux (PAR) and 12 new PAR coming through redistricting.
- Finally, institutionalizing efforts is critical to project sustainability. Would it be possible for the project to involve MOL Occupational Safety and Health inspectors to help build their capacity to inspect for safe workplace in agri-/aqua-culture? (MOESA, the Moroccan Ministry of Labor and Social Affairs is not listed on page 22.)

15. Vietnam: Mekong Delta Integrated Climate Resilience and Sustainable Livelihoods Project – World Bank - GEF ID = 9265

✓ Canada's Comments

- Canada supports this project and positively notes the project multi-focal area objectives, including its adaptation co-benefits through improved resilience of people's livelihoods and assets to climate change in selected vulnerable sub-regions.
- There has been cutting edge work completed on climate change adaptation and aquaculture through several initiatives, including the International Development Research Centre's Adaptation Research Initiative in Asia. We request that the final project proposal indicate how the lessons learned from this and similar initiatives will be built upon and expanded.
- Please clarify in the proposal why additional R&D is needed, including by providing an assessment of current R&D and a gap analysis.
- We agree with the STAP that additional details are needed on how the target to avoid 4.5 Mt CO₂-eq was calculated and how it will be achieved.
- Please include an analysis of how the proposal relates to the country's INDC.
- We note that the proposal includes activities associated with land use, land-use

change and forestry, including strengthening and improvement of measurement, reporting and verification of the GHG emissions and carbon sequestration, as well as sustainable forest management. The final proposal should include detail on how these activities align with the country's REDD+ plan.

✓ **Germany's Comments**

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

Germany generally appreciates the proposal's deep analysis of threats and vulnerabilities for the Mekong Delta region, its citizens and special land and water use livelihoods. The proposal's "Theory of Change" also highlights Germany's approaches in the Mekong Delta in which Vietnamese partner institutions have been advised to strengthen research as a basis for improved planning and investment oriented decision making.

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

- Germany kindly suggests further describing the institutional set-up which reflects the so far hampered interfaces between research and decision-making. The PIF's para. 22 highlights the current wealth of data and the lack of use for evidence-based decision-making and climate resilient planning. Hence, Germany welcomes the intended cooperation with main national ministries such as MARD, MoNRE and MPI. In this context, however, it would be recommendable to provide further description of MARD's and MoNRE's research agencies IPSARD and ISPONRE and their intended roles and mandates. As both research agencies already possess key data, it remains unclear why these organizations have not already initiated a coordinated exchange regarding climate change projects and associated vulnerabilities in the Mekong Delta.
- Another associated question concerns the role of the Mekong Delta provinces within the institutional set-up. Vietnamese provinces are mandated with vast decision-making powers. Fiscal responsibilities and the fact that up to 70% of Vietnam's budget is being spent at provincial level make Provincial People's Committee's (PPC) and their sector departments key partners in climate related investment decisions and negotiations. The above appreciated "Theory of Change" however might encounter a range of hindrances if the local government level was not appropriately involved. Especially IPSARD's and ISPONRE's role as potential "climate service" providers has not been emphasized enough.
- Notwithstanding this, the PIF justifiably mentions the so far limited role of the Southwest Steering Committee as a regional Mekong Delta institution of the Communist Party of Vietnam. Nevertheless, it would be recommendable to take questions related to inter-provincial coordination further into account. The 2016 Prime Minister's decision for piloting an inter-provincial coordination in the Mekong Delta features a key momentum also for bi- and multilateral donor agencies to further support this idea. Climate related research in the Mekong Delta suggests that an interplay between water and land management needs to rather take a regional instead of a provincial perspective. Mekong Delta wide research will ideally support planners

in priority setting regardless of provincial borders and to avoid occurring lock-in effects.

- At the same time, Germany also highlights the role of the Mekong Delta Group. A donor group, led by the World Bank and Germany, including the Netherlands, Australia, France and others. Through the cooperation of various development agencies, already existing materials e.g. regarding coastal protection, innovative approaches towards mangrove and dyke rehabilitation, the use and introduction of different climate smart agricultural methods and water management regulations between provinces can be used and scaled up.

✓ **Japan's Comments**

- To make Mekong Delta more resilient to climate change, this integrated approach would be worth to implement. However, the detail setup to strengthen connections between outcome by investing in research and benefit for communities is not articulated. Taking sustainable delta management for the sake of communities' benefit into consideration is needed.
- Japan International Cooperation Agency (JICA) has some projects below in Mekong Delta. In order to avoid duplication of assistance and to create synergy, close coordination with those projects is highly recommended.
 - Can Tho University Improvement Project (Technical cooperation project in Agriculture, fisheries and environment)
 - Water Management project
 - Mekong Delta Initiative (Regional technical cooperation of forest, agriculture and private sectors participation for Green Economy)

✓ **USA's Comments**

- Overall, this is a welcome project that will match nicely with the broader delta investments from the World Bank. This project will contribute greatly to building climate resilience in the Mekong delta, while also improving livelihoods in the region. We are pleased to see that the project encourages provincial cooperation and collaboration to address the mounting challenges of climate change, which often transcend provinces in the Mekong River Delta region. We hope this project will strengthen the knowledge and information base on climate change risks and provide capacity building and technical assistance to rural communities to advance climate-smart agricultural projects in priority sectoral areas such as rice and aquaculture production. While the project includes clear domestic and regional environmental benefits, the proposal should provide clearer information on the project's benefit to the global environment.
- As the proposal is further refined, the activities should focus more on scaling-up versus the current heavy focus on research and pilot projects (there is already plenty of the former and much of the latter). At times the proposal lacks specifics. For

example, the proposal frequently mentions “climate smart” practices, without explaining what that means. The proposal should include at least one example of the climate smart agricultural practices planned and how it will be applied.

- Given the scope and scale of the support to Delta climate programs, it seems this project will provide a central (and critical) framework for additional investments in the future. However, the project assumes impact/scale will be achieved by integrating practices into government structures. From past experience, numerous and complex bureaucratic and political challenges may hamper full integration, and the project team should work to address such hurdles. The platform for best practices and knowledge exchange among provincial authorities and ministries will be critical for the project’s long-term success given the inherent connection between agricultural production and sustainable land and water management practices. The project also correctly notes that much of the data relevant to this project is fragmented.
- The project’s focus on identifying and delivering “climate-resilient infrastructure” through additional IDA loans may benefit from broader donor collaboration and information-exchange (if not already planned). For example, moving forward, greater consideration should be given to how the project will make use of the Mekong Data Center. The WBG’s focus on buying data/data rights and insisting on data standardization may not lead to positive results. A simple way to gather data into one place - perhaps online - would be best.
- Public participation has generally been taken into account but more information and continuous assessment regarding the new consultation mechanisms would be welcome. Bilateral and regional development assistance mechanisms may be able to reinforce CSO programs from this and the parent loan. More specifics on how the project will coordinate with related efforts would be welcome.
- With regard to labor standards, it is unclear how the project has taken into account labor requirements for agriculture and aquaculture innovations. The project should consider coordinating with the Ministry of Labour, Invalids and Social Affairs (MOLISA) and Department of Labour, Invalids and Social Affairs (DOLISAs). The United States Department of Labor’s Bureau of International Labor Affairs can serve as a resource for the project on labor issues in Vietnam and facilitate communication with relevant labor officials and contacts. Note that the United States Department of Labor (USDOL)-funded project on child labor is also working in An Giang province. The sectors of focus are agriculture and fisheries, to be further refined after the baseline survey is completed in late 2016, early 2017.
- Finally, as the proposal is further refined, consideration of the indicators that will be used to track the project outcomes should continue, as should consideration of how the project will be sustained once the GEF grant is used up, and potential risks. For example, it is unclear how the transition to safe shrimp aquaculture practices could be successfully implemented long-term—considering any increase in production costs, etc. In the long-term, as the reforested trees grow and establish their canopies, it is possible that the shade may lead to disease and make it impossible to grow shrimp.

What alternative livelihoods are envisioned should that happen?

PROGRAMMATIC APPROACHES

16. Global (Burkina Faso, Colombia, Guyana, Indonesia, Kenya, Mongolia, Peru, Philippines): Global Opportunities for Long-term Development of ASGM Sector - GEF GOLD - UNEP/CI, UNDP, UNIDO - GEF ID = 9602

✓ Canada's Comments

Canada is pleased to support this project and notes its complementarity to the work that is being undertaken under the Minamata Convention on Mercury. In particular, it is positive that the National Action Plans, developed by countries in response to their obligations under the Minamata Convention, will be used to drive components of the work under this GOLD program. Given the economic and environmental impacts of artisanal and small-scale (ASM) mining, addressing the issues is a development priority. The proposed program has the potential to significantly contribute to the reduction of toxic pollution from reduce the impact of this source of toxic contamination.

In terms of specific comments:

- Please ensure consistency in data: on page 3, the amount of reduction of mercury use by ASM directly resulting from the program is estimated at 123 tonnes, but on page 12, the number used is 92 tonnes.
- We suggest using numbers from the World Gold Council for estimating the total amount of gold produced by ASM for a stronger and more realistic estimate of ASM gold production.
- The final project proposal should ensure it draws from lessons learned in past projects in the countries, particularly those that relate to the formalization of miners.
- In Africa, small scale processing plants or operations, including those built illegally by foreign interests, have large negative impact on the environment and large dredging equipment is being used in rivers without proper remediation measures. Please elaborate on how the child projects in Africa will address these issues.
- We recommend that the final project proposal elaborate on the actions to be taken that will reduce the supply of mercury. For example, the countries could consider implementing legislation that ban or restrict the export of mercury.
- We request that geological risks be addressed in the Risk section. For example, as ore is being exhausted in a mining area, miners tend to migrate to other areas, which jeopardize long-term livelihoods of rural communities that typically bear the social costs associated with ASM.

✓ **Germany's Comments**

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

- In compliance with the recommendations of the STAP review, Germany has no further comments regarding improvements.

✓ **Japan's Comments**

Requests to UNEP are as follows;

- Request enough consultation with UNIDO in forming the project so that the project is harmonized (avoiding gaps and overlapping) with the UNIDO's initiatives. This project is proposed by UNEP, but UNIDO has been implementing projects for ASGM, and has been taking the lead of the Mercury Partnership (UNEP joined in this field only recently).
- To establish well-considered revolving loan system which is a key component of the project. As we understand that UNEP does not have sufficient experiences on microfinance, there is a risk that the loans may not address the core issue of ASGM. In this field, UNDP and UNCDF have historical advantages in providing similar schemes and UNEP should ask them for cooperation.
- To request the proposal of more comprehensive system rather than just providing technical options. We noticed the proposal stating that "There are technically proven and economically viable alternatives to mercury" as an assumption of the project. We would like to point out that many technologies may only be applicable under certain conditions. Over-reliance to some particular technologies may lead the ignorance of local conditions and needs.

✓ **USA's Comments**

- Overall, the proposal is a balanced and comprehensive approach to identifying and addressing Artisanal and Small-scale Gold Mining concerns across a range of countries in a systematic and coordinated fashion.
- While there is acknowledgement of the importance of land tenure in some of the "child" proposals, this central element to addressing formalization is not adequately covered in any of the proposals. The project team should better integrate incentives for miners to participate in the projects. These incentives must be framed more in light of miner's priorities, such as greater control over the mining process and potential for higher and more consistent gold yields with fewer inputs.
- The proposal should also address the difference between illegal and criminal activities, particularly given the current widespread dependence on mercury for ASGM. Illegal activities include both informal or unsanctioned activities, as well as

criminal activities that are part of a law-breaking enterprise. Most ASGM activities are currently part of the informal sector, and formalization efforts are not keeping pace with the increased activity in the sector. Some of the countries have committed to policies and time frames that will define current practices as criminal, prior to alternative production methods and systems becoming widely available or adopted. It could be counterproductive to criminalize current practices in ASGM, because it could drive the informal industry further into the shadows, making it more difficult to formalize the sector and introduce alternative methods. Furthermore, perceptions about ASGM activities are also a risk. Some stakeholders see all ASGM activities as illegal and believe the use of mercury should be banned. These perceptions could also have a negative impact on efforts to formalize the ASGM sector. To address this, the program will need to develop activities to raise awareness of - and facilitate discussions about - ASGM.

- Page 7 discusses the role of the OECD Due Diligence Guidance and notes that “the Guidance is widely implemented by the industry, through the development of industry association programmes designed to operationalize all five steps of the Guidance. Industry initiatives estimate that approximately 90 percent of all refined gold, 95 percent of smelted tantalum and 75-85 percent of smelted tin produced every year is covered by industry audit programmes...” This seems to overstate the utilization of the Guidance (which we support). With respect to artisanal gold, coverage by programs that implement the Guidance to the Minamata Convention is limited.
- We support pursuing mercury-free technologies for gold production; however the Convention does not ban the use mercury and host countries should understand this in implementing the child projects. Banning mercury can drive transactions out of the formal economy into the black market, making interventions more difficult. Other approaches that reduce mercury use or curtail mercury emissions are also consistent with the flexibility provided by the Convention for the development of National Action Plans (NAPs).
- Public awareness, health education, and assessments are addressed in some of the child proposals but should be a fundamental component of all child projects given the likely continuation of mercury use in some form in most of the countries and the legacy of mercury contamination.
- Two of the primary challenges facing the GEF’s proposed program are 1) to map out and work with all ASGM-related stakeholders and initiatives in-country and 2) to promote information sharing and exchange of good practices. It would be helpful if the proposal included a results framework that illustrates the links among outcomes, indicators, outputs, and activities.
- Regarding project finance, additional information should be provided on the rationale for the proposed budgets by country. We believe the funding allocation for monitoring and evaluation (M&E) activities in the current proposal may be low. The program needs to develop a robust M&E system to monitor project activities –

including outputs, indicators, and outcomes at the global and country levels. The proposal does not include information about 1) how the program will monitor activities, 2) whether pre- and post-baselines will be established, or 3) how the project will monitor sentiment among program participants. Given the relevance of the proposed program and the need to generate evidence, it is important to explore the possibility of conducting an impact evaluation.

- The proposal should provide additional information on how the program will coordinate with related activities and how it will engage with the public (e.g. CSOs and indigenous groups).
- Finally, with respect to knowledge management, the project implementers could consider expanding the outcome of Component 4 to include the use of information by relevant stakeholders, including in communication tools beyond the website. The program could also use other tools to disseminate information about project activities globally and in-country. For example, it could use apps, SMS, and Whatsapp, as well as promote the development of networks to share information about program activities and other initiatives. In the proposal's current state, it is unclear why financial access is included under this component. Given the diversity of ASGM stakeholders, it is important that the program develop an outreach and communication strategy.

17. Regional (Albania, Bosnia-Herzegovina, Egypt, Lebanon, Libya, Morocco, Montenegro, Tunisia): Mediterranean Sea Programme (MedProgramme): Enhancing Environmental Security - UNEP/EBRD - GEF ID = 9607

✓ **Germany's Comments**

Germany approves the following PIFs 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:

- **OUTCOME 1: Reduction of land-based pollution in priority coastal hotspots and measuring progress to impacts.** Germany suggests expanding the suggested focus on chemicals pollution (in particular POPS, PAHs, and mercury) to include also non-industrial sources of POPs of high relevance. Furthermore, a more detailed analysis for each country (how effective support and coordination will be reached) is recommended for better monitoring and evaluation purposes.
- **OUTCOME 4:** Germany welcomes the promotion of an integrated coastal zone management (ICZM). Participatory management, thus the empowerment of user groups into the management decisions as well as the surveillance and monitoring is crucial for the projects' success. A stronger emphasis on alternative livelihoods for fishing communities is recommended.

- **OUTCOME 7:** Germany welcomes the improvement of management capacity as well as the expansion of the Libyan Marine Protected Areas (MPA). It is recommended to incorporate the high importance of artisanal fisheries for local food security and livelihoods. The MPA management plan should imply buffer zones between the MPA and fishing areas. In these small strips local fishermen communities can use an exclusive access (ban for industrial fisheries) and benefit from extensive fisheries. Involvement of fishermen in the management of marine protected areas is crucial for their sustainability.

Further, Germany recommends the consideration of

- Lobbying for a higher political prioritization of the implementation of national fishery policies and frameworks promoting sustainable marine resource management.
- ‘Blue Carbon’ offsets as an economic potential for coastal villages.
- Decentralized adaption strategies for the intrusion of saline groundwater into aquifers. In sunny areas PV-driven small-scale desalination plants could allow local approaches.
- The involvement of wastewater reuse and freshwater consumption reduction strategies.
- More investments into wastewater-treatment facilities for the reduction of heavy metals, endocrine disrupters, plastic and other pollutants as runoff in the Mediterranean sea.

18. China: China's Protected Area System Reform (C-PAR) - UNDP/FECO, CI - GEF ID = 9403

✓ **Germany's Comments**

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

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

- Germany recommends including thorough analysis on how the project could support improving the governance of the Protected Area (PA) System. Germany therefore suggests considering the elaboration of a Governance Action Plan in order to improve the overall quality of governance (equitable and effective governance) of the PA system. This action plan could include initiatives to foster appropriate changes in PA legislation and policies encouraging different governance types, such as e.g. including community conserved areas or areas under co-management, recognised by IUCN and the CBD, and advancing legal and policy instruments that promote governance quality.

✓ *USA's Comments*

- As the program is further developed, greater consideration will need to be given to program implementation, generation of sufficient political support, and enforcement to avoid the creation of a “paper park” system.
- With regards to program finances, most of the funds will be given to the central and provincial authorities; however it might increase effectiveness if some of the funds were given to a third party CSO.

NON-GRANT INSTRUMENT PROJECTS

19. Seychelles: Third South West Indian Ocean Fisheries Governance and Shared Growth Project (SWIOFish3) - World Bank - GEF ID = 9563

✓ *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 expansion and reconciliation of marine protected areas with a strong focus on sustainable use of marine resources. Improving the participatory fisheries governance and reducing illegal fishing are seen as vital to the project success. The described instruments are sound and have been proven to work in projects worldwide.

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

- Germany would like to see that more emphasis in the project design is given to the importance of artisanal fishers for food security and livelihoods of local communities in the Seychelles. In this context it should be pointed out that the project design is 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). A reference to the countries fisheries & aquaculture investment strategy within the Comprehensive Africa Agriculture Development Programme (CAADP) should also be made.

✓ *USA's Comments*

- We suggest that when the Environment and Social Management Framework (ESMF) is developed, it should include an income and livelihood restoration plan to offset the loss of incomes for displaced fishermen and women. In addition, the project should take into account the potential risk of child labor or forced labor.