



COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
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INTERSESSIONAL WORK PROGRAM

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEF March 2014 Intersessional Work Program

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BIODIVERSITY

1. Cameroon - Participative Integrated Ecosystem Services Management Plans for Bakassi Post Conflict Ecosystems PINESMAP BPCE – UNEP - GEF ID = 4739

✓ Canada's Comments

We are pleased to see the inclusion of private sector participation in the project, especially that of an agricultural cooperative. We think that this will add an important element to the design and implementation of the project.

We request that some sections be revised to improve the project concept. Specifically,

- We agree with STAP that the project's results framework needs to be strengthened;
- Section A.1.1 should provide clearer details on how the project aligns with the GEF BD focal area strategy;
- In a similar manner, Section A.2 should further clarify how the proposal fits in with Cameroon's NBSAP / national BD planning under the CBD; and,
- We request that the narrative description of the project and its components be revised to clearly communicate the problem that the project aims to address, the barriers to solving the problem, the strategies proposed to address these barriers, and the specific actions to be taken for each strategy.

✓ Germany's Comments

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

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

The project follows a convincing logic and approach, but improvements need to be made in terms of institutional communication and engagement of stakeholders, including potential co-financing sources. To our current knowledge, no co-financing agreement has thus far been concluded with KfW/ GIZ's sister project PSMNR. In general, Germany requests that the planned co-financing shall be confirmed by letters before endorsement. Thus far, a planned joint steering committee including co-financing partners has not yet come to fruition. Germany further requests the following:

- Institutional communication needs to be strengthened immediately during the preparation phase.
- UNEP should contact partners like the forest ministry (MINFOF) in charge of PSMNR or the supporting German implementing agencies to agree on terms for the implementation.
- There is a long history of competing mandates between the forest ministry (MINFOF) and the environment ministry (MINEP) that matters for the implementation of the project. We recommend clarifying these mandates through official channels before the project begins.
- Mandates, roles and responsibilities need to be officially agreed upon amongst the main institutional partners (MINEP, MINFOF, University of Dschang).

✓ **Japan's Comments**

This project includes several executing partners such as OPED and CHEDE Cooperative Union Ltd with MINEP. When formulating integrated ecosystem management plan, for example as mentioned in para 17, several stakeholder will be involved. In order to take more active participative approach to facilitate the formulation of the management plan, it is necessary to further identify and clarify the roles of stakeholders including local governments.

✓ **USA's Comments**

The United States requests the resubmission of this project.

The United States requests that this project be revised and re-submitted to the GEF Council prior to GEF CEO Endorsement to allow the UNEP to respond to the major revisions requested by Scientific and Technical Advisory Panel (STAP) and to our additional technical comments below.

- Throughout this project proposal, local communities, local stakeholders, and local users are all referenced as target groups in different contexts. To provide greater clarity, we request these terms be clearly defined. Furthermore, if there are technical differences between these groups as they are used in the context of this proposal, we request that the revised proposal also address why each group will be targeted for particular activities in different contexts.
- This proposal includes references to developing a certification scheme for sustainable fishing and planning for more efficient, environmentally sustainable use of natural resources including but not limited to wood from mangroves. If these aspects of the proposal are retained, we encourage the UNEP to consider: (1) what types of alternatives will be required to help the local population to meet their resource needs under this new scheme; (2) what potential negative impacts of this scheme may be and (3) how potential negative impacts of this scheme may be mitigated.

- We encourage the UNEP to consider how mitigation measures can be employed to help address potential risks and to ensure project success. For example, Cameroon is rich in mineral resources. If mineral resource exploration begins during the timeframe of this project, it could negatively impact biodiversity conservation efforts. Additionally, it may also be important to consider security risks and the potential for political instability in the region, and how this could impact project implementation.

The United States fully supports the objective of this project: to employ integrated ecosystem management plans to ensure biodiversity conservation and improved management of landscapes in Cameroon, a country rich in biodiversity. The United States also appreciates that this proposal will consider Cameroon's National Biodiversity Strategy and Action Plan and is consistent with the Cameroon-Nigeria Green Tree Accord of 2006. As this project is modified, we hope that these aspects of the project will be retained.

2. **Chile - Mainstreaming the Conservation, Sustainable Use and Valuation of Critically Threatened Species and Endangered Ecosystems into Development-frontier Production Landscapes of the Arica y Parinacota, and Biobio Regions – FAO - GEF ID = 5429**

✓ Canada's Comments

We appreciate the inclusion of Table in paragraph 70, page 20 and note that it provides a good example of how PIFs can clearly show the link between a GEF project and the Aichi Targets under the CBD.

To improve the proposal, Section B1 should further detail the link between the proposed project and specific priorities highlighted in Chile's NBSAP / domestic plan for contributing to the Aichi Targets.

In addition, we note that the level of co-financing, particularly from the private sector, for the project seems low (4:1 overall), given the focus on sustainable use within a country with a relatively high level of economic development. We believe that participation from the private sector could be strengthened, especially given the inclusion of public-private partnerships in the project.

✓ Germany's Comments

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

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

Germany supports the PIF. It addresses underlying causes of endangered wildlife and tackles the main drivers of biodiversity loss outside of protected areas. Objectives and components are generally clear and coherent. The PIF describes the expected contributions to Aichi Targets 2, 3, 5 and 12. The approach emphasizes participation of

stakeholders, including small and medium size agricultural and forest producers and indigenous communities. It explicitly builds on existing management plans and aims at improving inter-institutional cooperation and coherence. Germany would like to provide the following suggestions for improvements:

- Clarification on selection of project region: Paragraph 3 states that individual conservation efforts have been made to preserve the species under consideration, which were unsuccessful because of the very extensive habitat requirements that call for an interregional conservation approach.
The project proposal should analyse and state more clearly if the selected demonstration sites are big enough to realistically maintain the current number of individuals of each species (outcome 2.1).
- At this stage, the PIF does not sufficiently consider the economic risk of smallholders experiencing short to medium term income losses due to biodiversity conservation regulations and improved enforcement of these regulations.
This risk and strategies to manage it should be included in the final project document.
- Even though using market mechanisms, especially certification of agricultural and forestry products, is one of the central concepts of the project, the PIF is not sufficiently clear on the feasibility of certified production, especially for small and medium size producers.
The full project document should be based on a thorough market analysis, including the demand for certified products of the domestic as well as the international market, the estimated additional costs especially for small and medium size producers, and the income effects expected from certification. If this analysis shows that income losses are likely, additional measure of income loss compensation should be elaborated.
- The National Institute of Agricultural Development (INDAP), responsible for technical assistance and agricultural extension, will be one of the implementation partners. The problem description states that INDAP does not consider biodiversity-related aspects in its decisions until now.
We recommend a more thorough capacity building needs assessment as a necessary first step to implement and sustain the proposed inter-institutional cooperation.

3. China - A New Green Line: Mainstreaming Biodiversity Conservation Objectives and Practices into China's Water Resources Management Policy and Planning Practice – FAO - GEF ID = 5665

✓ Canada's Comments

To further improve this proposal, we request that the PIF highlight and add more details on how this project complements two other related GEF projects: “CBPF: Integrated Ecosystem and Water Resources Management in the Baiyangdian Basin” and “CBPF:

Conservation and Sustainable Use of Biodiversity in the Headwaters of the Huaihe River Basin”.

✓ **USA’s Comments**

The United States, in light of its policies for certain development projects, abstains from the decision on this project.

4. China - Developing and Implementing the National Framework on Access and Benefit Sharing of Genetic Resources and Associated Traditional Knowledge – UNDP - GEF ID = 5533

✓ **Canada’s Comments**

We request that two items be addressed in the project proposal:

It should be clarified that the references to derivatives of genetic resources are in accordance with the Nagoya Protocol, notably in B 1 1.3. (1) and (2); B 3 first bullet under “Expected outcomes”; and, page 7 Component 1 description. We note that, under the Nagoya Protocol, prior informed consent is for access to genetic resources, though the benefit sharing through mutually agreed terms can include derivatives.

Given that access and benefit sharing under Nagoya is restricted to traditional knowledge associated with genetic resources, not traditional knowledge at large, the proposal should ensure that references to traditional knowledge are accompanied by the phrase “associated with genetic resources”.

✓ **Germany’s Comments**

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

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

The proposal is comprehensive and ambitious. It covers a variety of different relevant activities and cases. Germany suggests the following:

- With regard to the emerging importance of marine GR in the fields of cosmetics and drugs (4 marine anti-cancer drugs approved since 2007), we suggest that the current EU-funded PharmaSea project with activities in Chinese territorial waters should be integrated in the MSP as one of the pilots in component 3. The PharmaSea project - according to its side event at ICNP-3 and its web page <http://www.pharma-sea.eu/> - focuses on biodiscovery research and the development and commercialisation of new bioactive compounds from marine organisms, including deep-sea sponges and bacteria, to evaluate their potential as novel drug leads or ingredients for nutrition or cosmetic applications. It is a four-year project backed by more than €9.5 million of EU funding and bringing together 24 partners from 13 countries from industry,

academia and non-profit organisations. First excursions to deep-sea water environments within the EEZs of Chile and Peru were announced for autumn 2013, bioprospection in Chinese waters was announced to happen at a later stage. The Chinese partner is the Wuhan University. One of the objectives of the PharmaSea project with regard to the application of the Nagoya Protocol and national ABS systems is "to identify and provide solutions to the key policy issues and legal barriers in the marine biodiversity pipeline". From the perspective of the provider countries targeted by the PharmaSea project it would be essential to come into contact and to negotiate effective ABS contracts reflecting the commercial intent of the activities.

- We also suggest that - preferably during the PPG under component 2 - a baseline study is undertaken to inform the Chinese government and stakeholders about research and development that was/ is ongoing with Chinese genetic resources and associated traditional knowledge. The suggested methodology is screening of scientific citation databanks covering some recent time period, e.g. the last 10 years. It is assumed that most publications reporting on the utilization of genetic resources and associated traditional knowledge mention the country of origin. Therefore, a search in scientific publication databanks enables a retrospective overview on past access. Such a baseline will inform and facilitate the development of an ABS system.
- We also see linkages with the former partner of the biodiversity sector project, the Center for Biodiversity and Indigenous Knowledge (CBIK), supported by GTZ from 2000 to 2005 to document and use indigenous knowledge of ethnic minorities for the use and conservation of biological diversity in Yunnan. We suggest involving CBIK in the project activities, especially since they will also cover the Yunnan region.

✓ *Japan's Comments*

Japan acknowledges the importance of the project and would like to have detailed information of it. We sincerely request the Secretariat to provide us the draft final project document for consultation.

✓ *USA's Comments*

The United States requests the resubmission of this project.

The United States, in light of its policies for certain development projects, abstains from the decision on this project.

The United States requests this proposal be revised and re-submitted to the GEF Council prior to GEF CEO Endorsement to allow the UNDP to incorporate responses to our technical comments.

The United States believes the project proposal be modified to remove concepts which are not consistent with the Nagoya Protocol.

- This proposal makes references to requiring access and benefit sharing (ABS)

agreements for “derivatives” of genetic resources. Whether and to what extent the Nagoya Protocol applies to derivatives is a controversial issue, and one common view is that the national frameworks contemplated under the Protocol apply to genetic resources only, not their derivatives. Therefore, the inclusion of derivatives in implementation plans for ABS inappropriately expands the scope of the Nagoya Protocol, or at a minimum raises highly controversial issues for which GEF funding would not be appropriate. For this reason, the United States requests that references to applying ABS requirements to derivatives of genetic resources be removed from the revised version of this project proposal.

- The proposal makes reference to the protection of traditional knowledge, and would appear to create new protections for traditional knowledge, even for knowledge that is widely known or could be part of the public domain. The Nagoya Protocol does not cover all traditional knowledge, but only traditional knowledge that is associated with genetic resources, and of the traditional knowledge that is associated with genetic resources, only the “traditional knowledge associated with genetic resources that is held by indigenous and local communities.” Thus, if traditional knowledge is held by entities other than indigenous and local communities, then provisions of prior informed consent and mutually agreed terms of Nagoya Protocol Article 7 does not apply. We have concerns that the proposal goes beyond the provisions of the Nagoya Protocol, or that the GEF would be supporting attempts to create a domestic regime to claim intellectual property rights over knowledge that is in the public domain. The proposal should be limited to only traditional knowledge that has not been published, and which Chinese law currently provides indigenous and local communities the rights to exclude others from using.
- There are references in the proposal to processes that will “improve” China’s disclosure of origin requirement in its patents laws, and to establish requirements for certificates of origin. The Nagoya Protocol does not require that patent laws contain a disclosure of origin requirement. Moreover, we have concerns that such requirements may be inconsistent with the World Trade Organization (WTO) Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS Agreement), and the GEF should not be advocating policies without confirming that such policies are consistent with China’s international commitments such as the TRIPS Agreement. The TRIPS Agreement provides that WTO Members may, in the acquisition or maintenance of certain intellectual property rights, require compliance with reasonable procedures and formalities. It is not clear that a requirement of information unrelated to patentability is a reasonable procedure or formality that would be permitted by TRIPS. There is also not a certificate of origin requirement in the Nagoya Protocol- instead Article 17, for example, of the Nagoya Protocol uses the term “international certificate of compliance”. We therefore request that the project proposal be modified to exclude reference to either a disclosure requirement or a certificate of origin, and instead address a certificate of compliance as described in Nagoya Protocol Article 17.
- The proposal includes references to “Nagoya Protocol compliant” agreements. The Nagoya Protocol provides a general framework for countries to use as they establish

regimes governing genetic resources and associated traditional knowledge. The Nagoya Protocol does not, however, prohibit or restrict the nature or content of “mutually agreed terms” between providers and recipients. The use of “Nagoya Protocol compliant” as a descriptor for ABS agreements therefore is inaccurate and we request that it not remain a component in the project as it moves forward.

The United States appreciates that China intends to reinvest proceeds from its Access and Benefit Sharing (ABS) agreements towards conservation of biological diversity and sustainable use of its components, as described in output 1.5. We believe that this will help this project to have a significant global environmental benefit – and are hopeful that this component will remain central to the project as the UNDP revises the project proposal.

5. Congo - Creation of Conkouati Dimonika PA Complex and Development of Community Private Sector Participation Model to Enhance PA Management Effectiveness CDC&CPSPM – UNEP - GEF ID = 5537

✓ Germany’s Comments

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

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

The PIF is both coherent and corresponds well to the CBD Aichi Targets and Programme of Work on Protected Areas. Component 2 on community and private sector participation could be developed further to focus more strongly on improved livelihoods and sustainable use, in addition to its present focus on participation in anti-poaching measures. Germany requests however the following:

- The project structure seems extraordinarily complex (38 contributors of financial or in-kind support to the project from government, CSO, and private sector) and there is hardly any information on how or by whom this complexity will be managed. This should be addressed in the proposal.
- The challenge of inter-agency coordination for land use planning with a common vision, though analyzed in the problem analysis, is not adequately reflected in the project framework and needs to be elaborated further.

✓ Japan’s Comments

This project clearly elaborates how the project contributes to Aichi Target by improved management of Park Area. The Project document mentions that the area, where protected area to be established, experiences illegal incidents. In COMIFAC region, fighting against illegal activities is one of the highest priorities. In this sense, the project is highly

relevant to the agenda of COMIFAC region. COMIFAC produced trans -boundary protected area management in collaboration with JICA in 2013.

✓ *USA's Comments*

The United States recommends that, prior to GEF CEO endorsement, the UNEP modify the final proposal to better define the goals and impact. In particular, we request that the UNEP address the following questions and comments to better define the specificity and output value of these proposal activities.

- Output 2.1.4 A package of awareness raising activities targeting the local community and private sector to reduce conflicts and increase support the conservation objectives:
 - How extensive are the expected impacts, as measured by local participant attendees/interactions are the awareness activities proposed?
 - How will the proposed activities reduce conflicts? Specifically, how would the proposed activities result in measureable capacity-building or increasing local knowledge and access to tools, rights, or resources? This is a critical area which requires further definition as the resolution of community resource conflicts will ultimately determine the longevity and sustainability of the region's protected areas.
- Output 2.1.6. One (1) programme to develop capacity and build the skills of local communities and opinion leaders in area of sustainable management and utilization of biodiversity is designed and implemented in project area
 - As written, the output goal of "1 program to develop capacity and build skills" is vague and circular. We request that this output better define who from local communities would take part in capacity-building, estimate, how many people would benefit from training activities, and what skill areas would be concretely developed and transferred by the activity. The proposal could also be improved by including how these skills will influence the goals of long term conservation of protected areas.
 - Since "sustainable management" is a vast thematic area that could be applied to a range of occupations and land uses, we request that the target impacts of training be identified (improved agriculture, reduced hunting, etc...) and how local participants are to be engaged by activities proposed. Would proposed activities be one-off or sustained consultations? How will results be evaluated and communicated? What opportunities will local communities have in designing the capacity-building of most benefit and relevance to them?

6. Macedonia - Achieving Biodiversity Conservation through Creation and Effective Management of Protected Areas and Mainstreaming Biodiversity into Land Use – UNEP - GEF ID = 5528

✓ **Germany's Comments**

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

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

Germany supports the proposal as it follows a logical structure and approach. It is based on thorough research and baseline information. Germany would like to suggest the following improvements:

- The proposed work so far seems to be based on a number of different existing planning documents and approaches, stemming from different and previous (donor) commitments. The project should focus on linking these existing efforts during implementation and a joint approach.
- The proposal includes important pilot activities “on the ground” as well as training components. In addition to that, securing long-term financing for the protected areas will be one of the central challenges. This should be emphasized further, perhaps in the context of the targeted “management effectiveness”.
- As the project aims to increase the area under protection, it should ensure the financing of the protected area system.

✓ **Japan's Comments**

JICA established GIS system under the Project on Development of Integrated System for Prevention and Early Warning of Forest Fires in Macedonia. The GIS system contains forest ecosystem information including protected areas. It is highly recommendable to liaise with JICA counterparts such as Crisis Management Center and Public enterprise Macedonian Forests.

7. Madagascar - A Landscape Approach to Conserving and Managing Threatened Biodiversity in Madagascar with a Focus on the Atsimo-Andrefana Spiny and Dry Forest Landscape – UNDP - GEF ID = 5486

✓ **Germany's Comments**

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

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

Germany welcomes the PIF and would like to make the following suggestions for improvement:

- Regarding land use planning at local level (community conservation areas), the approach developed by AVSF at Fokontany level should be taken into account. AVSF is implementing the approach together with the regional farmer organization (maison des paysans) within a project on food security and agriculture.
- Considering the existence of several forest areas where the management has already been taken over by local user-groups, Germany recommends that SAGE also uses the planned budget to support existing arrangements in terms of biodiversity protection, and does not solely focus on the establishment of new areas.
- VPDAT (Vice-primature en charge du développement et de l'aménagement du territoire) is promoting land use planning at municipal level and has validated a guide for the elaboration of these plans. The project should be in line with this evolution and use the guide for supporting decentralized land use planning as one key element of the landscape approach.
- Local land authorities/offices (Guichets fonciers) should play an important role in the implementation of the biodiversity plan and facilitate the elaboration of municipal land use plans. If possible, we recommend foreseeing the support and establishment of guichets foncieres in selected municipalities, which would facilitate the development of such local land use plans.

✓ **Japan's Comments**

The methodology used in below JICA project can be applicable and useful for this Project though each project location is not identical. It is recommendable to contact to JICA country office in Madagascar for more details.

- Project Title: Project of Integrated Approach Development in order to Promote Environment Restoration and Rural Development in Morarano Chrome
- Project Duration: February 2012 to February 2017

✓ **USA's Comments**

The United States registers no formal objection to these projects but remains concerned about the situation in Madagascar. The United States welcomes positive developments, including the inauguration of a democratically elected president, and we look forward to the new president's formation of a government that has the confidence of the Malagasy people and credibility with the international community.

8. Madagascar - Conservation of Key Threatened Endemic and Economically Valuable Species in Madagascar – UNEP - GEF ID = 5352

✓ Canada's Comments

We request that the project proposal clearly identify how this project addresses biodiversity conservation and sustainable use beyond current and past GEF-funded biodiversity projects in Madagascar. In particular, it should be made clear how this project addresses previously unattended ecosystems, geographic areas and their species. Specifically, it would be useful to include a gap analysis that supported taking a species-based approach, identifying which species had outstanding needs.

With regards to the project framework:

- The Output 1.1.1 “A review of lessons learnt from across the southern Africa region and other parts of the world on species-based approaches as complementary of ecosystem based approach to biodiversity conservation” should clarify how it adds value and should explain why GEF funds should be used in this area.
- The outcomes and indicators listed under Component 1: “developing a participatory species-based approach to biodiversity conservation”, should be revised to align with the component, rather than focus on gathering baseline information about the 21 species.

✓ Germany's Comments

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

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

The overall project proposal is a holistic approach considering challenges (A.3.) as well as the national context (B.1.) and stakeholder participation. It also seems to set realistic targets. Germany would like to make the following suggestions for improvement:

- Build upon the expertise, experiences and lessons learned from the sustainable natural resource management program of the German-Malagasy Environment Programme (<http://www.giz.de/en/worldwide/20052.html>)
- Consider the variety of protected areas (governed by state, shared, private, indigenous and local communities) for the relevant project components and recognize as well as support different governance systems and approaches.
- Specify Monitoring System(s) for species conservation.

✓ USA's Comments

The United States registers no formal objection to these projects but remains concerned about the situation in Madagascar. The United States welcomes positive developments, including the inauguration of a democratically elected president, and we look forward to the new president's formation of a government that has the confidence of the Malagasy people and credibility with the international community.

9. Turkey - Conservation and Sustainable Management of the Steppe Ecosystems – FAO - GEF ID = 5657

✓ Germany's Comments

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

The subject of the project is highly relevant and deserves attention at the highest level. Although steppes constitute a key element of Turkey's rich biodiversity heritage and Turkey has a global responsibility for them, this habitat type has been badly neglected in the Turkish Protected Area System. The very recent finding of a Leopard in the Karacadağ area (one of the two proposed intervention sites) underlines the significance of the proposal. It is very encouraging that the project intends to work with the Ministry of Food, Agriculture and Livestock (MFAL) as one of the two execution partners.

- The PIF should be resubmitted with a much clearer focus on concrete and realistic conservation outcomes, and with a clear implementation structure which ensures that the institutional, technical and managerial experiences in protected area management in Turkey are harnessed to the full advantage of the project.
- The comparative advantage of FAO is not convincing, as FAO has little track record in protected area management. There is a risk that FAO will not sufficiently build onto the previous experiences made with PA management in Turkey (where three GEF-funded PA management projects have already been completed) and elsewhere. Regarding "community based approaches" as an innovative tool, this is outdated, as it already corresponds to the minimum standard for such activities.

Further, Germany requests the following being taken into account:

- The project proposal at this stage could benefit from a clearer vision on how to manage steppe areas, and what goes beyond a classical PA Management approach. The "reconciliation of land use activities with steppe biodiversity conservation" remains ineffective unless the proposal shows the incentives for local farmers to pursue such an approach. Land tenure is surely one of the most critical aspects in steppe management, but is not even mentioned here.

- The outputs of the project are mainly described as assessments, action plans, strategies, program preparations, analyses (e.g., gap analyses), plans, institutional mappings, etc., but little is said about how all this will be translated into conservation on the ground. There is a clear need for shifting project activities from conducting studies and developing strategies to implementing concrete conservation action.

CLIMATE CHANGE

10. Algeria - Integrated Municipal Management Model of Household and Similar Waste with Low Greenhouse Gas Emissions – UNDP - GEF ID = 5675

✓ Germany's Comments

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

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

The comments raised in the PIF review sheet are very valuable, especially those related to the trucks' flexibility in using other fuels (e.g., LPG) in the event of biogas being unavailable, and those related to risk of inadequate waste sorting by households.

- Germany especially seeks clarification on whether a phased implementation would be more appropriate, especially in light of the unknown willingness of households to sort waste.

Other comments are:

- The economic attractiveness is key to the success and the replication by other municipalities in Algeria.
 - The short enumeration of factors taken into account for the NPV calculation seems incomplete; such topics as maintenance costs of biogas plants, operation of the recycling plant, costs for the composting plant, fueling stations for the trucks, etc. are not mentioned.
 - A cost comparison compared to alternatives, e.g. pure composting, is missing.
 - The quantities of waste and the waste composition are based on estimates only. Backing the emission reduction and the economic assessment with international waste expertise could be beneficial, as many waste projects around the globe have experienced quantities that deviated largely from original estimates.

- In case of limited profitability, it might be necessary to increase waste fees. However, this can only be done by the national and not by the provincial government. Is the national government backing such a decision?
- Apart from general framework conditions that might be very similar in other municipalities compared to the municipality of Eucalyptus, an important factor is the saved transport costs on transport distances of 120 km for Eucalyptus. Germany seeks clarification on the impact of this factor on economic feasibility.
- Furthermore, clarification is sought on how realistic a comparable mitigation potential is for these municipalities, as some might still dispose waste to non-engineered landfills where mitigation potentials might look quite different.
- The large investments will be difficult to be realized within the project's timeframe, taking into account Algerian tender regulations.
- Bio-digestion and the use of digested waste for agricultural purposes require clean and uncontaminated waste. Clarification is sought on the extent to which dangerous contents such as batteries are already collected separately in functioning systems in Algeria. As batteries can burst, sorting alone might not be sufficient. There are many international projects that have experience in this matter.
- The emission reduction calculation resulting from biogas use seems to assume 100% of electricity and 100% of accruing thermal energy being used. Especially for the latter, this seems unrealistic.

11. Botswana - Promoting Production and Utilization of Biomethane from Agro-Waste in South-Eastern Botswana – UNDP - GEF ID = 5628

✓ Germany's Comments

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

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

- The PIF provides many details. Germany would like to suggest elaborating further on the assessment of the appropriateness of using the biogas to replace fossil fuels in vehicles. It is also suggested to exchange with producers of biogas fuel stations and a project funded by the International Climate Initiative of the German Federal Ministry for the Environment, Nature Protection, Nuclear Safety and Construction (BMUB) regarding a similar project funded in Brazil and implemented by the Fraunhofer Institute for Interfacial Engineering and Biotechnology (<http://www.igb.fraunhofer.de/en/competences/environmental-biotechnology/bioenergy/bio-methan-sewage-plant.html>).

12. China - Enabling Solid State Lighting Market Transformation Promotion of Light Emitting Diode Lighting – UNDP - GEF ID = 5669

✓ 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:

Germany largely supports the STAP comments, but sees the necessity for “major changes.” The requirement to update basic data (e.g., the current penetration rate indicated at 3%, but presumed to be at 12% according to sources mentioned by the STAP) can change the entire intervention logic in terms of incremental cost reasoning and contribution to GEF’s focal area strategic goals. In detail, Germany suggests the following requirements:

- Update the basic data as required by the STAP and verify validity of the intervention logic as well as of the incremental cost reasoning.
- The Chinese SSL production is stated to be one of the leading in the world with more than 6,000 SSL related companies and more than 20,000 related patents. Knowing this, why is support by the GEF required?
- The benefit of project component 3 “demonstration plants” remains unclear. With the total market of SSL consisting of 120,000,000 SSLs annually, the benefit of supporting the production of 714,000 SSLs annually remains unclear.
- The proposed project is assumed to contribute to CCM2 “Promote market transformation for energy efficiency in industry and the building sector.” However, it remains unclear of what the expected market transformation consist. Is the expansion of the market considered to be market transformation?
- The analysis of barriers should be strengthened:
 - It is unclear how barrier 1 (“Lack of Systematic Analysis on Status of SSL Industry and Applications”) is linked to CCM2 (market transformation). The mere collection of data does not induce a market transformation. Is the lack of data really a barrier, and if so in which sense? In this regard, the benefit of project component 1 remains unclear.
 - It is unclear if the baseline analysis laid down to the identification of barrier 3 (“Lack of SSL guidelines for production”) actually corresponds to reality. If 50% of SSL products are already exported today, and are primarily exported to markets with high quality standards such as the European or the US American market, the presumed lack of quality standards for SSL products is questionable.

- In regards to barrier 4 as well as in regards to project component 4, Germany refers to the STAP comments on Chinese verification entities and the existence of SSL testing standards.
- In line with the argumentation of the STAP, the emission reduction calculation should be based on a proven methodology, and assumptions should be made public. Herein, the minimum consideration period should be as long as the expected (technical) lifetime of SSLs. Furthermore, the baseline should adequately include the plan of the Chinese Government to phase out incandescent light bulbs by 2016.
- In regards to project component 4 (“Established and enforced China Standards for SSL Products”, “Established and operational SSL Product Testing and Certification System”), it is unclear if these elements could also be integrated into existing activities such as PILESLAMP or En.lighten.
- Special attention should be paid to a clear analysis of leakage effects. Exporting SSLs does not necessarily reduce emissions compared to the baseline situation.
- For the assumed project scenario, it remains unclear if the number of 430 million SSLs considers the export rate of 50% and if respective leakage effects are considered (Chinese products could replace more efficient products from elsewhere).

✓ **USA’s Comments**

The United States, in light of its policies for certain development projects, abstains from the decision on this project.

13. China - Greening the Logistics Industry in Zhejiang Province – UNDP - GEF ID = 5373

✓ **Germany’s Comments**

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

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

The STAP emphasizes the importance of the project in view of freight transport accounting for 70% of China’s transport GHG emissions in 2005. According to the STAP, the GEF portfolio includes only a few projects focused on freight (Colombia GEF ID=4603, Morocco GEF ID=5358). However, there are other projects that might be interesting to connect with. Germany recommends the following:

- Exchange with the “ASEAN-German Technical Cooperation: The Regional Programme “Cities, Environment and Transport in the ASEAN Region” (<http://www.citiesenvironmenttransport.org/>). The project assists partner institutions in the region in improving air quality, promoting energy efficient transport, and

increasing competitiveness, while simultaneously achieving GHG emissions reductions. The program includes a sustainable ports program.

- The indicated framework needs to be further elaborated and be supplemented by quantitative indicators, such as the number of other provinces and cities being targeted, the target value for the reduction of empty truck loads, and so forth. Such information has generally already been provided in the PIF, but is not yet part of the indicative project framework.
- In the section “Global Environmental Benefits,” item d) mentions “reduction of logistics costs” as an environmental benefit. In the view of Germany this is not an environmental benefit and needs to be modified.
- Germany requests to verify at CEO endorsement the availability of all mentioned sources of co-finance as also recommended by the STAP.

✓ **Japan’s Comments**

Japan acknowledges the importance of the project and would like to have detailed information of it. We sincerely request the Secretariat to provide us the draft final project document for consultation.

✓ **USA’s Comments**

The United States, in light of its policies for certain development projects, abstains from the decision on this project.

14. Congo DR - Promotion of Mini and Micro-hydro Power Plants in Congo DR – UNDP - GEF ID = 4923

✓ **Germany’s Comments**

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

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

Germany welcomes the PIF and the good combination of different instruments to address the issue of rural electrification and GHG emission reduction. The project framework describes “Financial viability of MHP mini-grid ensured” as one expected output. The implementation of the micro hydro power plants should be conditional on the feasibility of the mini-grids respective of the availability of other sources for their financing. Germany would like to raise the following:

- There should already exist a number of manuals, including training and maintenance manuals, around the globe regarding small-scale hydropower plants. These should be taken into account.

- The STAP's comment to further clarify if there is reliable and regular rainfall is supported; in case of irregular rainfall a combination with other technologies might be worth an analysis.
- Germany seeks further clarification on the baseline, as also raised by the STAP: Although there might be a situation of suppressed demand, there is still the question of whether diesel generators would be the baseline alternative. There is also the question what would happen to replaced diesel generators.
- The output-based scheme, which is meant to subsidize the feed-in tariff for some initial years, makes sense. Germany, however, seeks clarification on whether there is a threshold beyond which the output-based scheme would be overloaded, meaning that it could not be assumed reasonably for the hydropower plants to be replicated and to be operated after the phase-out.
- The tariff setting methodology to be developed with the Power Sector Regulatory Authority could be explained in more detail.
- Quantitative information in terms of number of micro hydropower plants and sizes should be added. The same applies to other targets of the project such as number of people trained.

15. India - Market Transformation and Removal of Barriers for Effective Implementation of the State Level Climate Change Action Plans – UNDP - GEF ID = 5361

✓ Germany's Comments

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

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

The innovative character of the project is rather weak. SAPPCs as such cannot be considered innovative.

- In line with the STAP's comment on the rather broad assumptions related to emissions reductions, Germany seeks clarification on the choice made regarding the two pilot states. The mitigation potential is higher in other states.
- It is crucial to ensure the linkage of the project with other initiatives throughout India as well as coordination between them to avoid duplication. It could be explained more thoroughly, how lessons learned will be shared.
- Developing the MRV system for SAPPCs is a crucial component of the project. When designing the MRV systems for the states of Manipur and Madyha Pradesh, special attention should be paid to ensure that the objective and scope of the SAPPCs

is well understood to steer the process and monitor progress in achieving the desired outcomes. It would also be beneficial to integrate lessons learned from MRV systems in other states into the planning. In the same sense, the lessons learned from the project should be shared with other states. Furthermore, coherence with the national MRV system for the NAPPC should be ensured. National guidelines for the preparation of SAPPCC MRV systems could be very helpful.

✓ *USA's Comments*

The United States believes that the general reasoning for supporting effective implementation of the State Action Plans on Climate Change (SAPCC) in India is logical and compelling. To ensure this project will be implemented as it is envisioned, we request that the UNDP modify the full project proposal in response to our technical comment prior to GEF CEO Endorsement.

- Since this project will focus on Madhya Pradesh and Manipur, the United States recommends several aspects of the proposal be reconsidered to better respond to account for local constraints.
 - The final project proposal should address the specific risks associated with project finance in Madhya Pradesh and Manipur. These risks could be different in each state and may include: (1) limited reliability of energy resource assessments; (2) unrealistic bids for grid-tied solar energy procurement; (3) reliability of the state subsidy scheme; and (4) payment risk from the off-taker for the solar procurement. It would be worthwhile to look at the issue of off-taker payment risk under the state renewable energy policies, since many of India's distribution utilities are financially stressed.
 - The strategy for catalyzing investments should reflect existing practices in Madhya Pradesh and Manipur. For example in Madhya Pradesh, solar power is procured through a tender which is often over-subscribed, as in the recent round two of the National Solar Mission. Therefore, there should be a stronger rationale for the focus on pipeline development as the key constraint for mobilizing investment.
 - The final project should examine the manner in which the SAPCC are planned and operationalized in the target states. Specifically, what are the state agencies involved in renewable energy and development? To what extent can the State Nodal Agency (SNA) for climate change influence these other agencies and what efforts are already underway that may need to be considered? For example, in Madhya Pradesh, there are ongoing plans being implemented with support from the Department for International Development (DFID) for energy efficiency as well as with the International Finance Corporation (IFC). How will this project fit in with these other ongoing initiatives to avoid duplication and seek to achieve complementarity?
 - The final proposal should incorporate "lessons learned" from previous efforts in

Manipur and Madhya Pradesh to address similar energy and climate change initiatives.

- The United States would like to see the proposal strengthened with respect to how it will have a sustainable, broad impact.
 - To help the capacities developed be sustained long after the project end, we recommend there be a strategy for managing the risk of training people who are not retained by institutions. Ideas to be considered include but are not limited to development of a targeted approach for participant selection, or establishment of a local capacity to provide training in recognition of the potential for high turnover of the trained staff of the SNA.
 - To increase the likelihood that the product of this project will be broadly adopted, we request that there be an analysis of state specific needs for implementation of the SAPCCs. Additionally, it will may also be beneficial further explore the specific priorities in Manipur and Madhya Pradesh in terms of commitments and reporting.

16. Morocco - Promoting the Development of Photovoltaic Pumping Systems for Irrigation – UNDP - GEF ID = 5539

✓ **Germany's Comments**

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

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

Germany supports most of the STAP reports and appreciates the work achieved in the earlier PIF reviews up to the current version presented to the GEF council. STAP's argument that two different subsidy systems should not be put in place at the same time (national programme and GEF programme) is well thought through, as well as the request to reduce subsidy levels gradually, and the request to include the national programme in the baseline. However, Germany would like to add some additional comments or put some of the STAP's comments more in the foreground:

- The project proposal assumes that payback periods will decrease as deployment increases. We seek further information on the likeliness of achieving a quantity impact to the extent that payback periods can be reduced.
- The availability of water is not discussed. A discussion would be desirable especially in the light of the economic feasibility. Further, the costs of maintenance and the availability of maintenance services for this rather new technology are not described in sufficient detail.

- The synergy effects with climate change adaptation and food security (what crops are to be irrigated) could be further elaborated.
- Germany seeks clarification why areas managed by public funds, representing 56% of irrigated areas in Morocco, are not addressed.
- Germany seeks clarification on the criteria according to which demonstration sites will be identified.
- The proposal declares the development of a NAMA proposal. It does not describe whether costs of NAMA development, implementation, and especially MRV pay out the potential benefits, especially when taking into account the National Programme that would be included in the NAMA.
- How will the project ensure that the RESCOs sell the appropriate solution to farmers and not the most profitable one? This question is of outstanding importance when taking into account the lack of experience of farmers with this technology.

17. Paraguay - Innovative Use of a Voluntary Payment for Environmental Services Scheme to Avoid and Reduce GHG Emissions and Enhance Carbon Stocks in the Highly Threatened Dry Chaco Forest Complex in Western Paraguay – CI - GEF ID = 5668

✓ *Canada's Comments*

We note that the project includes the option to transfer Payment for Ecosystem Services (PES) credits from one part of the country to another, particularly from areas where landowners are not able to meet the 25% legal requirement for land conservation. We request that the proponents clarify how they will ensure that this offset system does not adversely affect certain local areas and certain ecosystems.

In addition, the project should provide more clarity on how its PES scheme will interact with Paraguay's eventual REDD+ system. Specifically, the proposal should clearly outline the project's value-added and how it will be incorporated into REDD+.

18. Russian Federation - Low Carbon Technology Transfer in the Russian Federation – UNIDO - GEF ID = 5366

✓ *Germany's Comments*

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

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

STAP expresses its concerns about the sustainability of the proposed LCT Platform and its integration into the federal and regional processes. It doubts the integration into the other initiatives endorsed by the government including up to 30 other platforms, at least four of which directly focus on energy systems, energy efficiency and renewable energy. This is a serious concern. Germany asks for clarifying this issue in extensive detail before endorsing the proposal. Further, Germany requests considering the following issues:

- The proposal still needs to specify how decisions can be made together despite the large number of participants in the committee.
- Clarification is sought regarding how the platform shall be sustained after the phase out of the GEF engagement.
- It should be taken into account that piloting of low carbon technologies may only be helpful in cases in which barriers can be removed through piloting. Other technologies have already been piloted in Russia. In general, the theoretical approach behind piloting is to be explained in greater detail, taking into account the large geographical expanse of the Russian Federation and the ability of the target population to access or derive benefits from pilot plants.
- The GHG emission reduction calculation, especially for biogas, should be laid down in full detail. Methane generation in cold climate zones is significantly smaller than in moderate or warm climate zones, and biogas digesters leak a certain share of biogas to the surroundings.
- The potential for synergies to other activities including GEF IDs 3593 and 5072 should further be considered.
- The project aims to strike an effective balance between supporting and enabling environment for transfer and deployment, and supporting the manufacturing capacity. Germany seeks clarification regarding how the right balance will be determined and if a modification during the implementation shall be possible.
- It is anticipated that quantitative criteria related to the GHG emission reduction and other environmental impacts of each transfer or deployment project will be key in the awarding process. In this context, Germany seeks clarification on whether “counter measures” are planned for the case of non-delivery of the awarded projects.

✓ **Japan’s Comments**

Japan requests that this project be deferred for consideration at the May 2014 Council meeting.

19. Serbia - Removing Barriers to Promote and Support Energy Management Systems in Municipalities (EMIS) throughout Serbia – UNDP - GEF ID = 5518

✓ Germany's Comments

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

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

The project takes a commendable approach in that it builds on existing experience in Croatia.

- The major concern of Germany is about the benefit of installing further demonstration projects (project component 3), as there are already over 100 relevant demonstration projects in Serbia.
- Germany would appreciate receiving clarification on which updates of energy efficiency legislation for the building sector are sought. When transferring the Energy Management System (EMIS) of Croatia to Serbia it is important to adjust the procedures and activities to the local conditions in Serbia, since the primary focus of the Energy Management System in Croatia was not on Municipalities. It might make more sense to develop EMIS by Serbia on its own based on the good quantity of data available in the country.
- Together with the Ministry of Energy and the Ministry of Construction and Urbanism, the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) develops a common web-based data management system which includes monitoring, verification, as well as evaluation of energy-related activities in the building sector.
- Communal energy managers are currently collecting data on energy efficiency in buildings. This data only needs to be compiled and then it could be used for setting up a Serbian EMIS (for the building sector). GIZ cooperates with 30 municipalities and with the Ministry of Construction and Urbanism on energy management issues.
- GIZ is already offering some energy training courses. In this context, Germany seeks clarification on the content of the training courses envisaged by the proposed project and the potential for synergy effects (including technical assistance provided by JICA).
- Germany seeks clarification on the access options to EMIS.
- The Croatian Energy Management System was initially financed by GEF and then fully financed by the Croatian Environment Protection and Energy Efficiency Fund. Are comparable financing structures envisaged in Serbia, for instance that the co-financing municipalities will be able to self-support the EMIS? The proposal solely mentions that it will be the role of the Government.

- Germany seeks clarification on the assumptions laid down to the emission reduction calculation, especially in relation to the expected energy efficiency savings by EMIS; are they based on comparable experiences from elsewhere and if so, are framework conditions are comparable?

20. Sudan - Promoting the Use of Electric Water Pumps for Irrigation – UNDP - GEF ID = 5673

✓ **Germany's Comments**

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

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

Germany generally supports the STAP's comments and would like to put emphasis on some of them:

- A cost comparison between diesel and solar water pumping for a range of pumped water volumes should be provided in order to determine the subsidy level required.
- The proposal explains how water scarcity is a problem that will be worse in the future due to increased demand as well as potential impacts of climate change. Therefore, Germany recommends factoring in vulnerability analyses due to climate change, and taking this into consideration when planning the pumping in such a way to avoid overusing available water sources.

✓ **USA's Comments**

The United States, in light of its policies for certain development projects, opposes this project.

21. Venezuela - Promotion and Development of Renewable Energies through the Set-up of Mini-hydro Plants in Rural Communities Located in the Region of The Andes and the Southern Area of the Bolivarian Republic of Venezuela – IADB - GEF ID = 5676

✓ **Germany's Comments**

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

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

The project seeks to contribute to GEF focal area objective 3 "Promote investments in renewable energy technologies". Although this objective is not promoted through an

innovative approach, as lamented by the STAP, Germany also sees merit in rejuvenating existing plants and to generate power in rural areas. Germany would suggest further elaboration of the following:

- Analyzing the benefit of local capacity building in order to define what parts of the maintenance and operation tasks can be done by trained individuals from the municipalities and where external experts are needed.
- Clearly identify the reasons that led to the deterioration of the existing small-scale hydropower plants and define mitigation measures.
- It should be ensured that possible (positive and negative) impacts such as land ownership, competition for limited water resources upstream for irrigation or stock water supplies, and health and educational benefits from electrification are accounted for.

INTERNATIONAL WATERS

22. Global - Targeted Research for Improving Understanding of the Global Nitrogen Cycle towards the Establishment of an International Nutrient Management System INMS – UNEP - GEF ID = 5400

✓ Germany's Comments

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

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

UNDP is attempting to improve the available data and management options regarding nitrogen cycle. The scheme encompasses about 100 partner organizations and \$6 million of funding and planned co-financing of \$47 million within 4 years. To our knowledge there are no cases where opportunity costs for lost fishery revenues or lost tourism revenues were outweighed by investment costs into the prevention of coastal dead zones. However, the benefits of the activity are probably in linking different actors, mainstreaming, and public awareness campaigns.

- Germany approves the project proposal, but recommends a stronger focus on the mentioned plan to raise public and political support.

✓ USA's Comments

The United States requests that the UNEP modify the project prior to GEF CEO Endorsement in accordance with our technical comments.

The United States recognizes that excess nitrogen is one of the most significant global pollutants, especially in coastal and marine ecosystems. This proposal is technically strong and the proposed project components have received significant support from the global scientific community including the GEF STAP. Nonetheless, the United States believes the GEF should be cautious about supporting projects that have a significant research focus. At the same time, the project components included in this proposal (ie: tool development; quantification of nitrogen use flows and impacts; demonstration and verification of management tools; knowledge sharing / information management and capacity development) are required to facilitate future mitigation of reactive nitrogen on ecosystems and therefore we do not consider them research. For this reason, we recommend that the project title be modified to include the other aspects of the project proposal.

23. Regional (*Benin, Burkina Faso, Cameroon, Chad, Côte d'Ivoire, Guinea, Mali, Mauritania, Niger, and Nigeria*) - Improving IWRM, Knowledge based Management and Governance of the Niger Basin and the Iullemeden Taoudeni Tanezrouft Aquifer System (ITTAS) – UNDP - GEF ID = 5535

✓ *USA's Comments*

The United States recommends that the UNDP consider the following in the final project proposal prior to GEF CEO Endorsement:

- Expand the full proposal to include the impact of the Niger River Watershed in the delta/ estuarine system and in the Gulf of Guinea ecosystems (if any). Baseline knowledge on the impact in the marine environment maybe out of the scope of the project, but should be considered as one of many expected outputs from an integrated approach to water management.
- Consider water management from a health and sanitation perspective since this could also benefit the transboundary impact of the basin on costal ecosystems

24. Regional (*Democratic Republic of Congo and Republic of Uganda*) - Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project – AfDB - GEF ID = 5674

✓ *No comments were received for this project.*

MULTI-FOCAL AREA

25. Regional (*Russian Federation, Ukraine, Belarus, Kazakhstan and Armenia*) - Regional Demonstration Project for Coordinated Management of ODS and POPs Disposal in the Russian Federation, Ukraine, Belarus, Kazakhstan and Armenia – UNIDO - GEF ID = 5300

✓ Canada's Comments

Canada would like to congratulate UNIDO and all of the proponent countries for this project proposal, which aims to maximize synergies within the GEF's Chemicals and Waste focal area, and generate substantial co-benefits for other GEF focal areas, like Climate Change. We look forward to seeing similar project proposals in the future.

We request that this project be circulated to the GEF Council prior to CEO endorsement, to ensure the following concerns are addressed.

We note that there are various references to a “scale-up” project in the proposal (e.g., paragraph 1, page 10), which would increase investment activities in order to enable the destruction of additional ODS and POPs. The proposal should clarify if the proponents intend to submit a subsequent “scale-up” project, and its potential costs.

The proposal aims to establish new destruction facilities in three countries; however, it would likely be more cost-effective to export the waste to existing destruction facilities in nearby countries. Of note, the Multilateral Fund of the Montreal Protocol (MLF) has not financed the establishment of new destruction facilities, rather it has provided assistance for the destruction of the ODS in existing facilities in nearby countries, or in upgrading cement kilns or other facilities available in the country itself. In addition, we note that ODS disposal projects under MLF have cost effective levels around \$10/kg, with a ceiling for funding of \$13/kg. Conversely, the proposed project has an estimated cost effectiveness of \$50/kg. The data supporting the claim that more ODS and POPs would be destroyed in subsequent years needs to be strengthened. Overall, the justification for a more costly approach needs to be provided to ensure GEF funds are used in a cost-effective manner.

We note that under the MLF, proposals for ODS disposal must substantiate the quantities of ODS that will be destroyed by providing actual data collected in the country, which can be challenging to obtain. Currently, the project's estimates are based on assumptions of quantities that can be recovered from equipment; however, at least some of these recovered ODS could be re-used and are not available for destruction. The proposal should provide actual ODS data, or consider alternative approaches that would provide stronger estimates.

✓ **Germany's Comments**

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

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

Germany welcomes the PIF and generally supports the STAP comments, in particular the emphasis on networking with stakeholders. In the project region some projects are dealing with phase out of POPs. Experiences from existing networks, projects and stakeholder are to be taken into account. Germany would like to add the following:

- The PIF should take into account the role of the private sector to a more detailed extent. It is mentioned that the private sector is willing to contribute financially, but the role and input of the private sector is not clarified.
- Storage is a temporarily solution, but the main focus should be on recycling and destruction.

✓ **Japan's Comments**

Japan acknowledges the importance of the project and would like to have detailed information of it. We sincerely request the Secretariat to provide us the draft final project document for consultation.

✓ **USA's Comments**

The United States, in light of its policies for certain development projects, abstains from the decision on this project.

26. Haiti - Ecosystem Approach to Haiti Cote Sud – UNEP - GEF ID = 5531

✓ **Germany's Comments**

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

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

Germany welcomes the proposed project and its aim of promoting climate resilience and sustainable management of ecosystem services in the southern region of Haiti. We are particularly pleased to see that the PIF incorporates mitigation actions. With a view to further improving the proposed project, we share the observations made by the STAP and recommend taking its suggestions into account while drafting the final project document. In particular, we recommend analysing in more detail which population groups are most vulnerable to climate risks in the project communities and how interactions between the population and ecosystems affect adaptation to climate change (STAP review, paragraph

2; see also our comments on gender aspects further below). Furthermore, Germany recommends the following:

- It should be specified how the proposed project will complement and build on the Cote Sud Initiative (see STAP review, paragraph 7).
- Regarding gender aspects, the PIF notes that the proposed activities targeting men's and women's livelihoods will be pursued differentially in order to benefit both, and also to be able to address gender-specific vulnerabilities. In addition we would encourage identifying gender-specific potentials that may be used in the project context. In order to determine these potentials, as well as to further specify the vulnerabilities and the possibly gender-differentiated ways livelihoods are affected by climate change, we would recommend conducting a comprehensive target group and gender analysis. The analysis should then form a basis for an assessment on whether and how gender equality can best be promoted in the project context.

The project proposal addresses highly relevant and important issues for the sustainable management of natural resources in Haiti and for issues of adaptation to climate and environmental change. Germany makes the following suggestions for improvement:

- From our perspective, the project should put stronger emphasis on the relevance of ecosystem services and biodiversity for development, particularly with regard to linkages and trade-offs with existing and planned development activities (e.g. energy, infrastructure, agriculture, etc.).
It should put an emphasis on assessing ecosystem services and integrating them accordingly into development planning.
It should consider "trade-offs" between different (economic) activities and their dependence and impact on ecosystem services.
- Vulnerability plays a central role in the PIF. From our perspective, the project needs to be based on thorough vulnerability analysis which in many cases does not yet exist in Haiti, particularly for rural and remote areas. The project should therefore consider applying (established) methods of vulnerability analysis with regard to climate change, ecosystem management and protected area (e.g., using the MARISCO methodology: <http://www.giz.de/expertise/downloads/giz2013-en-biodiv-marisco.pdf>).
- There is currently a German-supported cooperation project being prepared to support the Haitian Ministry of Environment regarding the "La Selle" Biosphere reserve (ecosystem-based adaptation and cross-border approach resource management with the Dom. Republic). As far as possible, links and an exchange should be established with this initiative (and previous initiatives like the integrated watershed management programme in the Artibonite-region and the disaster-preventive reconstruction and livelihood stabilisation project).

27. Mauritius - Mainstreaming Biodiversity into the Management of the Coastal Zone in the Republic of Mauritius – UNDP - GEF ID = 5514

✓ *USA's Comments*

The United States strongly supports this UNDP GEF concept in Maruitius. This project will be an excellent case study that will yield important models and examples of environmental protection and marine resource governance in a relatively large, populated island with multiple economic and environmental pressures. As a prime tourist location, Mauritius will be able to lead by example in balancing economic and environmental priorities through this project. The Marine Protected Area Management plan and support from a variety of stakeholders included in this project provide promise for a long-term sustainability of marine resource protection efforts.

28. Pakistan - Sustainable Forest Management to Secure Multiple Benefits in High Conservation Value Forests – UNDP - GEF ID = 5660

✓ *No comments were received for this project.*

POPs

29. Regional (St. Kitts And Nevis, St. Lucia, Suriname, Trinidad and Tobago, St. Vincent and Grenadines) - Disposal of Obsolete Pesticides including POPs, Promotion of Alternatives and Strengthening Pesticides Management in the Caribbean – FAO - GEF ID = 5407

✓ *Canada's Comments*

To ensure the project's focus remains on POPs, we request that the project title be reworded as “Disposal of Obsolete Pesticide POPs including other pesticides, Promotion of Alternatives and Strengthening POPs Pesticides Management in the Caribbean”.

We request that the disposal target of 400 tonnes be clarified by stating what percentage of the obsolete pesticides stockpile is POPs and non-POPs.

We note the November 2013 GEF Work Program included a UNIDO regional project in the Caribbean called “Development and Implementation of a Sustainable Management for POPs in the Caribbean”. The GEF should ensure that the UNIDO and the FAO projects are well-coordinated and avoid duplication. For example, the UNIDO project already includes the establishment of an integrated regional system of POPs management (which includes pesticides), public awareness, and assessment of contaminated sites. As such, these activities should not be needed in the FAO project.

Prior to receiving support, we request that all countries involved in the project officially submit their National Implementation Plans. This would currently apply to Bahamas, St. Kitts and Nevis, St. Vincent and Grenadines, Trinidad and Tobago.

We note that under the Stockholm Convention, Article 6 (1) (e), Parties are obliged to “endeavour to develop appropriate strategies for identifying sites contaminated by chemicals listed in Annex A, B or C; if remediation of those sites is undertaken it shall be performed in an environmentally sound manner.” The contaminated sites component to this project should ensure that it does not go beyond the countries’ obligations under the Stockholm Convention. We support the inclusion of this project in the work program on the understanding that the GEF is funding the development of appropriate strategies for identifying sites contaminated by POPs and strategies for the remediation of these sites in an environmentally sound manner, and not directly funding the cleaning up of contaminated sites.

✓ **Germany’s Comments**

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

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

Germany welcomes the proposal and generally supports the STAP comments. In particular, the STAP comments on “why past efforts have failed” should be taken into account. Here it would be necessary to analyze the past projects’ efforts to avoid repeating the same failures. Additionally, Germany would like to suggest the following:

- It should be taken into account that not only are sea level rise and increased rainfall important factors when planning storages, but also land erosion and landslides. The project region is highly vulnerable to climate change risks and impacts.
- It is good that the proposal points out technology transfer. However, we seek clarification on who is expected to implement this technology transfer (private sector, south-south-cooperation, scientific institutes, etc.).

✓ **USA’s Comments**

The United States requests that the FAO modify this proposal to address our technical comments and the recommendations put forward by the STAP prior to GEF CEO Endorsement.

- The United States notes that, as in the November 2013 GEF Work Program “Development and Implementation of a Sustainable Management Mechanism for POPs in the Caribbean” project 5558, four countries included in this regional project (Trinidad and Tobago, Bahamas, St. Kitts & Nevis, St. Vincent & the Grenadines) have received GEF support for the development of National Implementation Plans but have not yet submitted them. We request that the GEF Secretariat confirm that these four countries included in this regional project have completed and filed their

National Implementation Plans prior to the GEF CEO endorsement of this proposal.

- This project should respond directly to the obligations set forth under the Stockholm Convention on POPs. While the Stockholm Convention obligates Parties to develop the capacity to identify POPs contaminated sites, it does not require their remediation, and we recommend that the GEF ensure that the contaminated sites component to this project not exceed convention obligations. The United States supports efforts in the Caribbean to develop strategies to identify sites contaminated by chemicals listed in the Stockholm Convention, and we want to ensure that GEF funds are channeled toward achieving convention obligations as a priority. Site remediation activities go beyond those obligations and therefore don't represent a priority for current funding.

30. Regional (Argentina, Bolivia, Chile, Costa Rica, Ecuador, Guatemala, Honduras, Nicaragua, Panama, Peru, El Salvador, Uruguay, Venezuela) - Strengthening of National Initiatives and Enhancement of Regional Cooperation for the Environmentally Sound Management of POPs in Waste of Electronic or Electrical Equipment (WEEE) in Latin-American Countries – UNIDO - GEF ID = 5554

✓ **Canada's Comments**

We note that the proposal covers a broad range of e-waste. We request that the proposal clarify that the focus of the project is on POPs in e-waste to ensure that GEF funding remains within its mandate under the Stockholm Convention.

We agree with STAP that private sector participation in the design, co-funding and implementation of this project is crucial and should be well-defined before CEO approval of the project. In addition, we agree that extended producer responsibility should be included in the project components.

✓ **Germany's Comments**

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

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

Germany welcomes the PIF and especially supports the STAP comment on the unclarified role of the private sector. However:

- It should be explained in greater detail how the private sector would be involved in the project, especially under the aspect of an extended producer responsibility (EPR).
- The standards for e-waste policies are not clearly defined and the existing policy frameworks in the countries differ widely. Countries with weak policy framework

should learn from the frontrunners to make up their own policy frameworks with sufficiently high standards.

31. Regional (Botswana, Lesotho, Madagascar, Mauritius, Malawi, Mozambique, Namibia, Seychelles, Swaziland, Tanzania, Zambia, Zimbabwe) - Disposal of PCB Oils Contained in Transformers and Disposal of Capacitors Containing PCB in Southern Africa – UNEP - GEF ID = 5532

✓ *Canada's Comments*

We note that Mauritius has received funding under Project 3205 for the “removal and disposal of the few remaining transformers that have PCB containing oils that exceed international standards”, which included management and monitoring of PCBs. We request that the proposal clarify how the proposed activities within Mauritius differ from Project 3205.

Prior to receiving support, we request that all countries involved in the project officially submit their National Implementation Plans. This would currently apply to Namibia.

✓ *USA's Comments*

The United States requests that the final project proposal be revised to allow the UNEP to respond to our technical comments below prior to GEF CEO Endorsement.

The United States is supportive of efforts to reduce environmental and human health risk due to PCBs in Southern Africa. However, we believe the GEF has funded similar activities to those proposed in this proposal in Mauritius. Prior to project approval, we would like information added to the proposal about how this project goes beyond GEF Project 3205, *Removal and disposal of the few remaining transformers that have PCB containing oils that exceed international standards*. We expect that, if there is a significant overlap in program priorities and objectives between this proposed project and the project previously funded through the GEF, that funding be distributed to other participating countries included in this regional proposal to avoid redundancy.

The United States notes that Namibia received GEF support to develop its National Implementation Plan (NIP) but has not yet submitted that plan under the Convention. We request that the GEF Secretariat confirm that Namibia has completed and filed its NIP prior to the GEF CEO endorsement of this proposal.

32. Regional (Botswana, Lesotho, Madagascar, Mozambique, Swaziland, Tanzania, Zambia) - Promotion of BAT and BEP to Reduce POPs Releases from Waste Open Burning in the Participating African Countries of COMESA-SADC Subregions – UNIDO - GEF ID = 5322

✓ **Germany's Comments**

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

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

The project is well designed with regards to taking into account the different levels of action. Germany would like to add the following:

- A stronger focus should be placed on awareness raising in order to reach the population; merely regulating the sector is not enough.
- The controlled waste incineration as another option is missing in the PIF. So far, only landfilling and recycling of organic waste are presented as options, which is insufficient. Further, landfills and dumpsites could be highly affected by impacts of climate change like flooding.

✓ **USA's Comments**

The United States requests that the final project proposal be revised to allow the UNIDO to respond to our technical comments below prior to GEF CEO Endorsement.

The United States supports the objectives of this project. However, we request additional information be added pertaining to the second component: the review of legal and policy frameworks. It is unclear how this proposed project builds on or goes beyond existing and ongoing regional projects with a similar component. For example, a significant component of the GEF/UNIDO/UNEP/AFLDC project on *Capacity strengthening and technical assistance for the implementation of the Stockholm Convention NIPs in Africa LDCs* is establishing comprehensive (or amending existing) legal and regulatory frameworks for the sound management of POPs. The proposed project contains a similar legislative and regulatory component specific to uPOPs from open burning. Our expectation is that this component is redundant for a subset of participating countries. Therefore, we expect that this component will either apply only to those countries who did not participate in the previous project (i.e., Botswana, Madagascar, and Zambia) or be expanded significantly beyond the detail provided in this PIF. If the latter, we desire additional details in the full proposal.

33. China - POPs and Chemical Pollution Solutions through Area-based-Ecoeffective-Management – UNIDO - GEF ID = 4854

✓ **Germany's Comments**

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

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

Germany welcomes the PIF, especially since it integrates in a sound way the different aspects of the cradle to cradle approach in the management of hazardous substances in the industries of two pilot regions. The proposal is relevant for the region, with its fast industrialization and the high strain on natural resources. As such the project could serve best as a practice example. However:

- The descriptions of the institutional and financial details of a later implementation are not sufficiently described and need to be detailed to a greater extent.

✓ **Japan's Comments**

Japan acknowledges the importance of the project and would like to have detailed information of it. We sincerely request the Secretariat to provide us the draft final project document for consultation.

34. Kenya - Sound Chemicals Management Mainstreaming and UPOPs Reduction in Kenya – UNDP - GEF ID = 5689

✓ **USA's Comments**

The United States requests that the final project proposal be revised to allow the UNDP to respond to the major revisions requested by the STAP and to our additional technical comments prior to GEF CEO Endorsement.

The United States is very supportive of efforts to reduce the release of POPs, and understand Kenya has taken a number of important national measures in this area. We also understand a number of challenges remain and we know, from recent Stockholm and SAICM meetings, that agricultural POPs are a priority area for Kenya. Therefore, we look forward to proposals addressing this critical topic.

This particular GEF project proposal is intended to address uPOPS reduction through improving chemicals and waste management, by targeting municipal waste. The management of municipal waste will produce significant national benefits; however, the United States does not consider municipal waste management to have particularly significant global environmental benefits. We understand this project is intended to enhance national municipal waste management practice through, for example, enhancing

the regulatory framework and application of BAT and BEP to ultimately reduce uPOPs release. While we are supportive of the objective, we would like the final project proposal to convey a better understanding how the proponents will calculate the incremental cost of the global environmental benefit, versus the cost contributing to national benefit. We note several components have activities that we understand will produce primarily national benefits; for example, component 2 includes implementation of environmentally sound waste management pilots in three counties, and component 4 local initiatives for the recycling and reuse of waste materials, and development of clean-up plans for at least three landfills.

PIF SUBMITTED UNDER THE PREVIOUSLY APPROVED PROGRAMMATIC APPROACH

1. Niue - R2R Application of Ridge to Reef Concept for Biodiversity Conservation, and for the Enhancement of Ecosystem Service and Cultural Heritage – UNDP - GEF ID = 5552

✓ Germany's Comments

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

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

Germany welcomes this well researched project which is the first full sized GEF project for Niue under the regional R2R program. Germany believes that the focus of this project, the empowerment of local communities for R2R implementation and management, fits the national and local contexts well and will enhance the capacities required for R2R.

Germany supports the STAP comments which should be taken into account in the final project design. Additionally, Germany suggests the following:

- The final project document should clearly identify how other relevant regional actors and supporting institutions such as the SPC, SPREP and IUCN will contribute to project implementation and capacity development.
- Germany suggests that contact should be made with IUCN on the EU-funded BIOPAMA project and with the GIZ on the BMUB-funded MACBIO project (e.g., concerning methods on Marine Spatial Planning (MSP) and conservation planning), as well as on the BMZ-funded Climate Change Adaptation Program, to explore options for cross-project collaboration and experience exchange.

✓ USA's Comments

The United States is supportive of this project proposal. By discrete application of the Ridge to Reef Approach (R2R), this project will yield important models and examples of environmental protection and marine resource governance and should produce significant global environmental benefits. We are pleased to see that this project is integrated well into ongoing regional GEF- supported projects.

To further strengthen this proposal prior to GEF CEO Endorsement, the United States requests that the UNDP respond to all of the STAP recommendations. Additionally, we welcome additional discussion in the full proposal for how risks to project implementation will be mitigated.

2. Palau - R2R: Advancing Sustainable Resources Management to Improve Livelihoods and Protect Biodiversity in Palau – UNEP - GEF ID = 5208

✓ Germany's Comments

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

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

Germany welcomes this project that aims to integrate the Palau Protected Areas Network (PAN) with the Sustainable Land Management (SLM) initiative. Germany believes that the approach of building institutional capacity and fostering a R2R approach across and within these initiatives supports the advancement of sustainable resource management. Germany supports the STAP comments and emphasizes the consideration of the potential of / compatibility with the holistic approach offered by *Marine Spatial Planning (MSP)*. Germany suggests the following improvements:

- Clearly identify how further regional actors, institutions and initiatives can contribute to the project.
- Highlight in more detail that institutional capacity development is considered an essential activity and how this will be achieved.

✓ USA's Comments

The United States is supportive of this project, and believes that the objective, “to effectively conserve and sustainably use biodiversity and maintain ecosystem goods and services in Palau by building institutional capacity to integrate the Palau Protected Area Network (PAN) with the Sustainable Land Management (SLM) initiative, and fostering a ridge-to-reef approach across and within these initiatives,” is important.

- In addition to responding to the STAP recommendations, we request that the UNEP consider the following in the full project proposal document prior to GEF CEO

Endorsement:

- The proposal acknowledges administrative risks in the context of this proposed project; however, there is no discussion of risks of this project to the environment itself. We request that environmental risks associated with this project concept be further considered.
- Palau has suffered from Typhoon Bopha in 2012 and Typhoon Haiyan in 2014. There may be needs and opportunities in the wake of these Typhoons that can be coordinated along with these proposed efforts.

3. Tonga - R2R Integrated Land and Agro-ecosystem Management Systems – FAO - GEF ID = 5578

✓ Germany's Comments

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

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

The overall project proposal includes a number of suitable and valuable approaches (e.g. R2R, local renewable energy). To improve the approach, Germany suggests the following:

- A spatial planning approach on land- and seascape level for entire catchments and the marine protected areas should be considered to support a more integrated approach.
- Integrate at least one pilot (component 2) in an outer island area, to gain experience within this environment. It might be an important area for local renewable energy sources.
- A more detailed description of linkages to the parent Ridge to Reef Program (GEF ID = 5395) could be a plus.

✓ USA's Comments

The United States requests that the FAO modify this proposal to address our technical comments and the recommendations put forward by the STAP prior to GEF CEO Endorsement.

As described, the integrated agro-ecosystem management within this GEF concept will be an improvement to existing approaches in Tonga; however, there are numerous areas in which the proposal can be strengthened to ensure that the project can be implemented most successfully and to help the project achieve the greatest global environmental benefits. In addition to addressing the extensive guidance issued by the STAP, we request that the FAO further consider how capacities developed as a part of this project will

contribute to the sustainability of the project outcomes in the context of the numerous barriers for addressing environmental issues enumerated within the project proposal. Additionally, it may be beneficial for the proposed efforts as a part of this project to coordinate these proposed efforts with the needs and opportunities that exist in the wake of the January 2014 Cyclone Ian, the first category 5 cyclone in Tongan history.