



**GLOBAL ENVIRONMENT FACILITY**  
INVESTING IN OUR PLANET

COMPILATION OF COMMENTS  
SUBMITTED BY COUNCIL MEMBERS  
ON THE  
OCTOBER 2015 WORK PROGRAM

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEF October 2015 Work Program

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**OCTOBER 2015 GEF WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE: GEF/C.49)**

**CLIMATE CHANGE**

**1. Global (*Costa Rica, Kazakhstan, Sudan*) - Leapfrogging Markets to High Efficiency Products (Appliances, including Lighting, and Electrical Equipment) (PROGRAM) - UNEP- GEF ID = 9083**

✓ **Japan's Comments**

- For the US is executing economic sanctions against Sudan at this moment, it should be clarified that there is no problem in transferring Dollar into Sudan for the implement of the project.

✓ **Germany's Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the program proposal in support of a global approach to introducing high-efficiency appliances and electrical products. The ambitious proposal builds on an existing GEF program (SEE4ALL) and will make a significant contribution to GHG reductions, as well as market transformation, if risks are well-managed and implementation is well-coordinated across a broad spectrum of stakeholders.

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

- With regard to Menu Option 4: Supporting policies for the market transformation to energy efficient products. For this menu option, it is written that “campaigns may include working with retailers to train staff to help and advise consumers.” A perhaps more efficient alternative would be to make sure that appliance manufacturers have the capacity to provide trainings to their distributors/retailers rather than the program attempting to train personnel at points of sale. With regard to demonstration projects: such projects should make energy and monetary savings public knowledge, with for example a digital meter (or low-tech alternative) in the lobby of the targeted ministry building, which compares costs and energy usage between efficient and inefficient

systems. The program also intends to enable local manufacturers to produce energy-efficient appliances. It would be helpful to include information as to what extent patent-holders elsewhere may impede this objective, and to what extent lesser-efficient technologies are to be utilized because of high costs for super-efficient technologies? Regarding gender: during the consultations with end-users, it should be determined if priorities for efficient appliances differ across the gender spectrum in order to pinpoint the priorities at the family-level vs. at a business or institutional level. The benefits section needs clarifications for greater coherence as it is not clear from the outset that the higher emission reduction numbers include the SEE4ALL Project's emission reductions.

- A further point of confusion is related to the pie chart on page 14, which does not depict “total potential CO2 Savings” as it is labelled, but rather shows the share of CO2 savings that will come from the Leapfrogging (34%) vs. the SEE4ALL (66%) Programs. The chart should be labelled accordingly. When one gets to the chart on page 15, then the percent allocations are switched, with 33% of the CO2 reductions attributed to SEE4ALL and 67% attributed to the Leapfrogging Program, which creates more confusion when compared with the previous pie chart. The section could generally benefit from more coherent language, as it is difficult to follow. A general consideration: experience with switching consumers from, for example, cheap disposable batteries to long-life, rechargeable batteries has shown that in order to have a successful transition, the consumer needs to see the benefit of making the switch, both in terms of money saved and a superior product. Getting consumers hooked on the energy-efficient appliances will require not only innovative financing to overcome higher upfront costs but also clarity that the product is the better choice in the long-run. Communication, training and outreach are, therefore, as crucial as having the product itself available.

✓ *USA's Comments*

- What is the rationale for pursuing this project as a Programmatic Approach, rather than as a single global project?
- In addition to the three countries with child projects included in the proposal, we see that an additional fifteen countries may be receiving funding for capacity building through the SE4ALL program. Which countries will be funded? How will countries be selected? We note that there may be a plan to expand this program to include significantly more countries (as many as 100).
  - What is the commitment deadline for additional child projects?
  - Will the Council have the opportunity to review a revised project framework document with more details for child projects and country participation prior to GEF CEO Endorsement of new child projects?
  - Will countries be able to revise their support of the Program after review of the final PFD document?

**2. Regional (Albania, Armenia, Azerbaijan, Belarus, Bosnia, Egypt, FYR Macedonia, Georgia, Jordan, Moldova, Montenegro, Morocco Serbia, Tunisia, Turkey, Ukraine) - Green Logistics Program (non-grant) – EBRD - GEF ID = 9047**

✓ **Germany's Comments**

- Germany welcomes the proposal of the EBRD to tackle a growing source of GHG emissions from the transport and logistics sector. While the exact activities to be funded under the project have yet to be identified, the proposal provides examples of the types of activities, as well as the procedures to be used in identifying the activities, including a list of best-available technologies for the logistics sector that may be supported through the project. Furthermore, the proposal plans to use GEF funding to leverage a much larger investment in the sector, which should result in meaningful impacts on emissions.
- The proposal is coherent, draws on a broad range of stakeholders, has the potential for significant GHG savings, is consistent with national strategies, and has a risk management strategy.

✓ **USA's Comments**

- Regarding the timing of the project components: will the capacity building aspects of the project begin prior to the release of the structured financing?

**3. Brazil - Biogas Applications for the Brazilian Agro-industry– UNIDO - GEF ID = 9057**

✓ **Germany's Comments**

- Germany welcomes the proposal of the UNIDO to tackle growing GHG emission and dependence on fossil fuels through the promotion of biogas-based mobility and other energy solutions for productive uses within agro-industrial value chains and by strengthening national biogas technology supply chains. The planned GEF project complements the activities by the Brazilian and German Governments in the energy sector that have a broader scope and refer primarily to the improvement of political and regulatory framework conditions (PROBIOGÁS project).

**4. China - Energy Efficiency Improvement in Public Sector Buildings – UNDP - GEF ID = 6930**

✓ **France's Comments**

- The role of the private sector investing in the Chinese public buildings is not defined. What is the market, how will private investors be attracted and involved? Are there

any incentives towards them? Payback period in building sector is usually long.

- A financing scheme considered in the project is the Energy Service Company (ESCO) scheme. If this scheme was successful in the USA or Canada, it mainly dealt with investments having a short payback period (lighting, electrical appliances, occupancy, VMC, A/C). It is usually not the case for thermal insulation (roofs, walls, windows). In addition, a major barrier to ESCO development is the implementation of reliable MRV systems and the reference scenario. How will this barrier be overcome?
- An important budget from the GEF is allocated to the TA components (USD 7.3 million), and “only” USD 1.2 million is budgeted for the investment component. It does not seem enough; demonstration projects are essential.
- The energy consumption in the public sector building in China is huge. Potential for EC&EE is consequently important and will contribute to fighting climate change. Investments are also important. How will the private sector actually be involved in this sector and why do you think it will be more successful than Local or Federal Governments’ involvement if any?

**Opinion:** *Favorable, provided that the above mentioned issues are addressed in the final project document.*

✓ **Germany’s Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the coherent project structure of the PIF and appreciates the aim to improve the energy efficiency in public sector buildings. The chosen components are complementing each other and the particular project outputs are well outlined. Germany especially supports the focus on monitoring and evaluation within the project. Nevertheless, Germany requests clarification on the following aspects:

- It is assumed that there will be 15 demonstration buildings for energy efficiency measures. In chapter 1.5 the energy savings are outlined as a consequence of these direct emission reductions. However, so far it is not clear which provinces will be chosen as sites for the demonstration buildings (no clear methodology for the regional allocation). This information would be relevant for further assessment on the demonstration projects.
- The PIF does not elaborate on the different energy efficiency technologies that are supposed to be implemented in the public sector buildings. Are merely building-specific technologies considered such as thermal insulation and lighting or do the measures also include applications used within the buildings?
- We would also suggest considering the lifespan of the public sector buildings when choosing the energy efficiency technologies.

✓ **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 for consultation.

**5. China - Integrated Adoption of New Energy Vehicles in China – UNIDO - GEF ID = 9226**

✓ **Germany's Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the PIF which aims at facilitating and up-scaling the integrated development of New Energy Vehicles (NEVs) and Renewable Energy. Expanding the application of renewable energies in NEVs through testing new technologies is an innovative approach which helps to realize and maximize energy saving and emission reduction potentials. The PIF provides a comprehensive approach to addressing the main existing barriers to the integration of electric vehicles and renewable energies.

- As stated by the STAP, some key issues regarding battery replacement costs, the recycling of battery materials and reduced voltage output with age would need further consideration in the project.
- The project would benefit from exchanging lessons learned and experiences already made in Japan and the US which already have demonstration projects in place on how to integrate renewables to NEV.
- It remains unclear, whether the project only includes electric vehicles or also vehicles running on hydrogen and biofuels. The term New Energy vehicles may be misleading in this context.
- Given the large potential of co-benefits associated with the integration of renewables in NEVs, the project proposal would benefit from outlining the anticipated benefits from reduced air pollution.
- Given the high rate of co-financing (117 millions), Germany would seek some clarification of the added value of the envisaged GEF project financing which only accounts for 8 Mio.

✓ **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 for consultation.



## 6. India - Creating and Sustaining Markets for Energy Efficiency – ADB - GEF ID = 9258

### ✓ Germany's Comments

Germany welcomes the following PIF but asks that the following comments are taken into account:

- Germany welcomes the PIF "Creating and sustaining markets for energy efficiency" in India. The project builds on many results already obtained by the Indo-German Energy Programme (IGEN) which has been financed by BMZ and implemented by GIZ and KfW together with the Indian Bureau of Energy Efficiency (BEE) and Energy Efficiency Services Ltd. (EESL) since 2003 and 2009 respectively. We especially appreciate the focus on energy efficient street and domestic lighting, tri-generation technologies and ESCO concepts which have as well been supported in India under the Indo-German cooperation by IGEN.
- Concerning the proposal, we nevertheless suggest to update the mentioned baselines with regard to the project outcomes (not only due to the results of IGEN). These baselines should particularly be improved with a view to the already achieved energy efficiency improvements through the installation of street lighting and domestic LEDs as well as for tri-generation technologies.

## 7. Indonesia - IBRD Geothermal Energy Upstream Development Project– IBRD - GEF ID = 9115

### ✓ Canada's Comments

- Canada welcomes this project and, in particular, we welcome the coordination of various development assistance actors, both within and outside of Indonesia. We also note that this project builds on the previous GEF engagement with the Indonesian geothermal sector and continues to strengthen the indigenous capabilities for geothermal development by providing the resources needed in order to establish an efficient and effective exploration program.

### ✓ France's Comments

- The two components are addressing two major constraints of geothermal development. The pre-survey and exploration drilling phase is the most risky part of a geothermal project. It is capital intensive and technical risks cannot be all foreseen (rocks, steam quality, drilling depth...). The tariff and licensing issues are important to allow the private sector to be profitable over a long term period.
- We support this project. However further clarifications are welcome regarding the contribution of the Clean Technology Fund (CTF) convertible loan.
- The GFF has been established in 2011 and was funded with USD 300 million. Is this

initial budget still available? If yes, what were the main reasons for non-use?

- The GHG emission benefits are estimated to 76.4 million metric tons CO<sub>2</sub>, and the Technical Assistance includes a Carbon sequestration component. What does it mean? Do the local geothermal fields emit a lot of GHG when drilling?

**Opinion: *Favorable***

✓ **Germany's Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the project's objective to de-risk geothermal upstream development in Indonesia to attract private investors in order to meet the steady increase in electricity demand. In our view, the proposal of a risk sharing arrangement between GFF and CTF and its potential expansion is a valuable approach. The targeted outcomes are well outlined. Both the projects' contribution to mitigate environmental externalities and to support Indonesia's energy security and independence of instable prices in fossil fuels is evident. However, upstream exploration comes at a certain cost. We would like to make the following suggestions:

- The defined emphasis under item 14 and the general focus on electricity generation do not appear to be completely coherent. Expenses linked to exploration of potential sites may not pay off in rural environments.
- The PIF lists under item F, the extent of reduction of substances which are harmful to the environment. It is not clearly evident if emissions and releases during the process of exploration, preparation and construction are included in the estimations. Furthermore, it is not entirely transparent where the savings originated from. Regarding this, a more comprehensive statement should be presented.
- Item 13 in the PID mentions the support for the development of an adequate regulatory framework. This should be taken into account in the technical assistance package under item 20 (and in the PIF under item B as TA).
- Under item 22 loan from CTF should be moved to column "contingent loan" Section V: Contribution Climate Investment Fund is unclear - item 15 mentions a contribution of \$50 Million by the Clean Technology Fund (CTF)

✓ **USA's Comments**

- We understand that the \$6.25M grant is meant to under-write the risk of geothermal exploration and drilling to encourage greater private sector engagement in future projects. However, with \$2,854,250,000 in co-financing and investments from other multilateral funds how will the GEF's investment lead to significant additional global environmental benefits?
- What will be included in the applications for financing? Will applicants be required to expand on the planned exploration program, provide details on the types of surveys to be performed, how much area could be covered by those surveys, and how the data

- will be interpreted and provided to the public and potential investors/developers?
- To what extent will the exploration results and associated Geothermal Data Bank be available to the public?
- Given the relatively modest amount of money devoted to the exploration program, how do you plan to tailor it to specific Indonesian needs?

## 8. Kazakhstan - De-risking Renewable Energy Investment – UNDP - GEF ID = 9192

### ✓ Germany's Comments

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the ambitious project and the alignment of the methodological approach with the recommendations of the UNDP publication “*De-Risking Renewable Energy Investment*” (UNDP 2013). The components provide clear perspectives on the intentions of the project. Nevertheless, due to the scope of contributing to Kazakhstan’s ambitious RES goals (from currently 0,06% to 30% (sic) of generation in 2030, most of them PV and Wind) the following suggestions should be taken into account:

#### Component 1:

- Far more attention should be paid explicitly to (i) RES integration issues, (ii) RES economic analysis and (iii) RES electricity system planning - not only for the benefit of individual RES investments (the focus of the PIF), but also from the government’s point of view. Otherwise significant net benefit and welfare losses will occur.
- To this end, the present Project Outputs need to be complemented by active RES integration planning and optimization of roll-out over time, location and technologies. For instance, the resource mapping could be complemented by a mapping of substations where RES would actually help (rather than hinder, as suggested by the balancing cost study) system operation and reduce system losses.
- This should be addressed from the outset, in order to avoid ex post problem fixing (as opposed to sound and transparent VRE roll-out planning) and ad hoc political “reactions” once cost and operational problems of a mostly “financial analysis-driven” VRE roll-out become apparent. Solid and credible RES expansion strategies that focus on system cost efficiency, power system stability and affordability will give the private sector confidence that future decision makers will stick to Kazakhstan’s overall commitment as well as each individual PPA rules, and thus lower risks and allow steady market development (as described for maturing nascent PV markets in GIZ 2014 – vRE Discussion Paper Series).
- Kazakhstan, due to its geographical extension, would need special attention to the geospatial allocation and volume of RES technologies, putting system friendliness and value of the generated RES energy at the core of the RES expansion strategy (and not exclusively minimizing financial LCOE of individual projects on special purpose vehicle level).

- Germany highly recommends that the RES policy and deployment mechanisms (FIT, Auctions) count with design features that incentivize the above-mentioned geospatial, volume and technology-specific allocation in order to assure a reliable and economic power system operation.
- Capacity expansion planning for thermal units, as well as hourly dispatch and grid management routines with Vs without RES would need special attention and regulations and may need to be adapted thoroughly in order to result in a reliable power system when more than 2% of PV and Wind (current pipeline of RES projects) should be deployed.
- Special attention should also be paid to the fiscal, macroeconomic and economic implications of the commendable RES deployment strategy. With current FIT levels, Kazakhstan’s electricity supply costs might increase by more than 50% until 2030.
- Kazakhstan’s strategy for coal and gas displacement would need to be assessed. Being a natural gas and coal producer, less internal consumption might lead to more exports, shifting the emission problem to other countries.

Component 2:

- Renewable Energy for Life: Policy De-risking Measures. The fiscal and financial effects of small scale ongrid RE should be studied and explicitly mentioned (under Outputs). In general, the ongoing gradual loss of current anchor customers during RES peak times may harm the balance sheets of existing system-relevant actors, especially distribution Companies. As this process will occur anyway (sooner or later, mainly due to falling PV Capex) it would make sense to define a national strategy to balance the effects of net metering on various actors.
- Renewable Energy for Life: Financial De-risking & Direct Financial Incentives: To actually quantify the risk premiums in the rural RES market, the envisioned interviews with local investors are probably not enough, so that additional methods need to be applied (paragraph 26). We suggest including them into project documents.

**9. Liberia - Increasing Energy Access through the Promotion of Energy Efficient Appliances in Liberia – AfDB - GEF ID = 9292**

✓ *France’s Comments*

- Promoting energy efficiency measures and appliances in rural areas in Liberia is very important, even if the electricity consumption per capita and the electricity access rate is low. Once electricity is available elsewhere, power demand will rapidly increase. People are not aware of energy efficiency measures or practices and electricity demand could quickly lead to power generation shortages and load shedding. It would be helpful to indicate how the GEF subsidy will help overcoming this barrier, i.e. increase awareness about Demand-Side Management (DSM) for “final users” who are not yet connected?
- The impact of the rural electrification project on climate change will be negative in the Medium Term. In this respect component 1 on institutional support is essential. Please indicate according to various development scenarios (Business-as-usual development

- model as reference) the benefits that will bring new energy efficiency policies, technology transfer and awareness campaigns.
- Gender analysis is very interesting to carry out but such a social and economic study requires a huge work load and is time consuming. What is the budget specifically dedicated to this study?
  - A specific section to the benefits that access to energy will bring to the population regarding health center improvement would be welcome, in a country which was heavily impacted by Ebola (with also many indirect impacts).

**Opinion: *Favorable***

✓ **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 is pleased to review the proposal for improving energy efficiency in Liberia. It is evident from the project justification that Liberia is in dire need of access to modern energy sources for the sake of human development and environmental health. Work is needed at the policy-level as well as at the consumer-level to move the country towards greater energy efficiency. However, the proposal lacks clarity on some key issues, which are outlined below.

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

- Regarding Component 1: Germany seeks clarification on how the identification of policies will translate into concrete actions. Following the identification of the policy and regulatory needs, for example, will an energy policy and strategy be agreed upon and implemented as a prerequisite for implementing activities at the consumer level? In its present form, component 1 remains vague as to who will do what and who will be accountable. There is reference to a “NEP” but this is not defined anywhere in the proposal. If the NEP has stated goals for the energy sector, it would be helpful to include that in the proposal and how this project contributes to their fulfillment. Furthermore, how does this project complement the work of other energy-related initiatives? It is stated that the project will coordinate with LEAP and other projects in the country, but it is not clear what the division of labor is.
- Regarding Component 2: The focus is on replacing inefficient light bulbs, with additional work being done on grid improvements. Given the focus of the project justification on the use of charcoal and wood for energy and heat, the expectation is that Component 2 could also focus on improving energy and efficiency in the heating and cooking areas, as well. Furthermore, the proposal points out that the use of diesel generators is detrimental to the environment, but this problem also does not seem to

be directly addressed by this project. There seems to be a disconnect between the motivation for the project and its proposed activities, which should be clarified. Is LEAP working with generators while this project focuses on lighting only? The project should refrain from contributing to a lock-in of diesel technology, and think of promoting future renewable energy development.

- Regarding Risk Management: The first risk named is “Limited Power Generation” and the proposed mitigation measures states that financing has been secured for three thermal plants run on Heavy Fuel Oil (HFO). Is the GEF project involved in securing that financing? Please explain how the lock-in of fossil fuel infrastructure is justified for a project aimed at GHG savings. Germany does not favour the use of GEF-funds for investments contributing to locking-in emission-intensive activities.
- Coherency Issues: It is not clear in the section 1.2 “1.2- The baseline scenario and any associated baseline projects” if the proposal is referring to the LEAP project or the proposed GEF project. It goes on to describe three components that do not align with either the LEAP project components or with the GEF project proposal’s components, and Component C is cut off in mid-sentence. This is followed by a map of Liberia with some drawings on it, which are not labelled. Please provide a description of what the map is depicting, as well as rework the language in this section for clarity so that it is clear which project is being described and which components correspond to which project.
- The proposed alternative scenario could be updated to take into consideration the newly agreed upon UN Sustainable Development Goals, which are the follow on to the MDGs referenced in the proposal. (Goal 7: Ensure access to affordable, reliable, sustainable, modern energy for all.)

#### **10. Mozambique - Towards Sustainable Energy for All in Mozambique: Promoting Market-Based Dissemination of Integrated Renewable Energy Systems for Productive Activities in Rural Areas – UNIDO - GEF ID = 9225**

##### ✓ Germany’s Comments

Germany welcomes the following PIF but asks that the following comments are taken into account:

- Germany welcomes the PIF no. 9225, Towards Sustainable Energy for All in Mozambique: Promoting Market-Based Dissemination of Integrated Renewable Energy Systems for Productive Activities in Rural Areas. The planned intervention is fully in line with the support of Germany to the goals of SE4All to provide access to modern energy for all by 2030. Germany supports the government of Mozambique in providing access to energy by means of grid extension, micro-hydro-power-stations, picoPV, Solar Home Systems and improved cookstoves via the global Energising Development Programme (EnDev). The planned GEF project to promote the use of

- energy through the introduction of solar water-pumping systems and biogas digesters complements the activities by the German Government in the energy sector. The broad capacity building elements foreseen in the proposal will be beneficial to the goals of interventions in the sector. The planned intervention does focus on capacity building interventions on national level (for improvement of the regulatory framework) and technical level (for the dissemination of the two technologies). In order to improve on the sustainability of the intervention, training measures on operation, management and sound business keeping for the farmers using the technologies should be considered.
- Germany would hence like to request the coordination and harmonization with the Energising Development Programme (EnDev).

## **11. Papua New Guinea - Facilitating Renewable Energy & Energy Efficiency Applications for Greenhouse Gas Emission Reduction (FREAGER) – UNDP - GEF ID = 9273**

### **✓ Germany's Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the project proposal from Papua New Guinea to increase its share of renewable energy usage and improve energy efficiency. The proposal is coherent, detailed in its planning, demonstrates ownership and coordination with a broad group of stakeholders, and uses GEF financing to enable important policy-related activities and demonstration projects, which will be key to the project's success.

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

Germany seeks clarification on one question: PNG is a net exporter of fossil fuels. The project seeks to “displace” the fossil fuels used in PNG for its own use, as part of its goal to become carbon neutral. Will the “displaced” fossil fuels be made available for export, i.e. burned elsewhere, or not extracted? Please provide information about plans for the further development of PNG's fossil fuel resources to put the national renewable energy development goals into context.

## **12. Samoa - Improving the Performance and Reliability of RE Power Systems in Samoa (IMPRESS) – UNDP - GEF ID = 9251**

### **✓ Germany's Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the project proposal from Samoa to reduce its GHG emissions from the energy sector through improvements to and expansion of its renewable energy generation systems. The national target to produce 100% of its electricity from renewable

energy by 2017 is ambitious given the trend in recent years for decreasing shares of electricity provision from RE.

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

Germany seeks clarification on the following aspects:

- Regarding the incremental cost reasoning (1st paragraph) it remains unclear what is meant by the project helping to realize “potential for fossil fuel”.
- Samoa has submitted a conditional Intended Nationally determined contribution () which confirms the national target and in which Samoa commits to generate 100% of its electricity from renewable energy sources by 2025. It would be useful to illustrate how the proposed activities are related to achieving the INDC target.

The section on risk management could be strengthened, as the risks for this project are, in part, substantial. For example, with regard to market barriers related to the small population and remoteness of the country from major markets: the national circumstances make the prospect of setting up RE systems production facilities and spare parts supply a major challenge. This is proposed to be addressed in component 4, however, the proposal is to assess the feasibility of setting up local production facilities. What is to happen if the feasibility study reveals that local production is not viable? Shouldn't such a feasibility study take place before the project starts? Why is this barrier not addressed in the risks section?

Germany suggests discussing and considering the potential risk (which is not included in the risk section), that the increased demand for biomass may cause perverse incentives, i.e. a need for more biomass to fuel increasing demand for electricity through the upscaling efforts, plus an increase in transport emissions to move biomass around the islands.

**13. Tanzania - Promotion of Bio-Ethanol as Alternative Clean Fuel for Cooking in the United Republic of Tanzania – UNIDO - GEF ID = 9281**

✓ *Germany's Comments*

Germany welcomes the following PIF but asks that the following comments are taken into account:

- Germany welcomes the PIF no 9281 “Promotion of Bio-Ethanol as Alternative Clean Fuel for Cooking” in the United Republic of Tanzania. The planned intervention in the cooking energy sector is fully in line with the support of Germany to the goals of SE4All to provide access to modern cooking energy for all by 2030. Germany supports the Republic of Tanzania in the market introduction of improved solid biomass burning stoves via the global Energising Development Programme (EnDEV). The planned GEF project to support production and marketing of ethanol fuel and stoves complements the existing activities. Germany would like to emphasize the importance of coordinating with existing projects and hence requests that the proponents coordinate and harmonize the envisaged activities with the



Energising Development Programme.

✓ **USA's Comments**

- Regarding the countries energy plan, has it been updated since 2003? Could you please confirm that this project reflects the priorities of the most recent national energy plan?
- We understand that the project plans to produce Bio-Ethanol by using molasses (a byproduct of sugar production). We have three significant questions regarding the sustainability of this investment:
  - In Tanzania there are four sugar mill companies that are operating fully and all of them are using the Molasses for Electric Power generation and selling to the National Electric Grid. What companies or countries will provide the molasses this project?
  - Have you considered other raw materials as sources for the bio-ethanol?
  - We believe that a person living below the poverty line in Tanzania will not be able to afford the market price of bio-ethanol. Since you are targeting low-income communities (who are currently using fire wood and charcoal), how will these communities afford to buy bio-ethanol (which costs significantly more than wood and charcoal)?
- The PIF includes a discussion of the reasons why it has been hard to get households to use new cook stoves in the past. Could you please elaborate on how this project will address those barriers, especially once the project financing is used up?

**Technically Cleared Projects** – we understand that there are several projects that were technically cleared by the GEF Secretariat but were not included in this work program due to resource constraints. Could you please provide us a list of those projects that are not included in the work program, but are technically cleared?

**14. Tuvalu - Facilitation of the Achievement of Sustainable National Energy Targets of Tuvalu (FASNETT) – UNDP - GEF ID = 9220**

✓ **Germany's Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the holistic project proposal which aims at facilitating the achievement of the national energy target of Tuvalu. As other SIDS-state, Tuvalu has set an ambitious national target to produce 100% of its electricity from renewable energy by 2020.

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

- As many other SIDS and Pacific Islands Countries (PICs) have set similar national energy targets (e.g. Fiji plans to convert to 100 percent renewable energy by 2013, while the Cook Islands and Niue are aiming for 100 percent electricity generation from renewable sources by 2020, see also Barbados Declaration), a close coordination and

exchange of information is crucial to maximize synergies in both phases, the successful preparation of the final project document as well as for the implementation of the project. In the same vein, the project proposal may benefit from depicting further related and relevant initiatives in other SIDS/ PICs and the role the Secretariat of the Pacific Regional Environment Programme (SPREP) of which Tuvalu is a member may play in achieving the set targets.

- The project proposal addresses many of the stated barriers. However, the project proposal could be strengthened by focusing on and narrowing the scope to some of the barriers and by depicting more clearly how these are complementary to the activities already in place.
- In the context of the ongoing preparation process for countries' Intended Nationally Determined Contributions, it would be useful to outline how the existing 100% renewable energy target relates to the envisaged INDC by Tuvalu (provided it will submit one before the COP in Paris). Clarification on this aspect is needed, as the assessment of mitigation options/targets for an INDC has in many countries entailed activities similar to those proposed in this PIF document (e.g. an evaluation of the already set national target).

#### **15. Uganda - NAMA on Integrated Waste Management and Biogas in Uganda – UNDP - GEF ID = 9210**

##### **✓ Germany's Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany welcomes the proposal for improving waste management practices in towns and municipalities through the introduction of integrated wastewater treatment plants and biogas digesters in Uganda. The proposal identifies an area with significant potential for low-carbon development and increase in power generation capacity since open dumping and burning of solid waste are a common practice in many parts of the country. However, Germany requests clarification on the following aspects:

- It is not clear from the proposal whether electricity from biogas plants will be fed in the grid. The proposal mentions that “*a new feed-in tariff structure will be introduced for RE projects*” and that “*The Ministry (of Energy and Mineral Development) will be engaged in the possibility of connecting the biogas plants to the grid infrastructure*”. But the proposal is lacking more precise information concerning the new, planned feed-in tariff structure and feasible options of connecting biogas plants to the grid. Germany seeks further clarification on these aspects.
- The planned budget for the construction of three biogas plants seems quite low and more specific information about the total amount of waste generated may be needed.
- The PIF only generally outlines the different technologies that are supposed to be implemented and more detailed specifications would be useful to assess the potential and effectiveness of the planned biogas plants.

- The proposal does not explicitly outline how waste is segregated in Uganda (households, mechanical biological treatment plant) which may impact the potential use of ferment residues as bio-fertilizer. Furthermore, adding WWT (wastewater treatment) sludge to the digester might make it difficult to use it as bio-fertilizer because of possible contamination. Therefore, it is important to consider that also when using organic fraction of MSW (municipal solid waste) as substrate, organic waste should be separated at the source in order to produce a valuable bio-fertilizer.
- The project could benefit from conducting an analysis of the biogas potential in Uganda.
- Germany supports Uganda in the waste and renewable energy sector via the Promotion of Renewable Energy and Energy Efficiency Programme (PREEEP) and the Reform of the urban water and sanitation sector Programme (RUWASS). Therefore, Germany suggests the coordination and harmonization with these programmes to avoid duplication of efforts and to generate synergies.

## LAND DEGRADATION

### 16. Regional (*Latin America and Caribbean*) - Risk Mitigation Instrument for Land Restoration (Non-Grant) – IADB - GEF ID = 9277

#### ✓ Germany's Comments

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

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

- The PIF should include an analysis of the target group “investors”: which type of risk mitigation is adequate for which type of investor? One effective option could also be compensation payments additional to credits – especially in the case of the integration of small scale farmers in rehabilitation / restoration activities.
- Consulting and coordinating with relevant programmes / projects at country and regional level during the elaboration of the project document as well as integrating the results of this coordination into the project document is deemed necessary. Existing experiences of the German Cooperation and other donors in the field of forest management, landscape restoration, management of bio-corridors etc. should be considered in the elaboration of the project document.
- Regarding Co-Financing: the PIF is mentioning „Impact Investors“ (related to the „20\*20 Initiative“) as sources of co-financing. As neither the investors itself nor the projected business cases are identified, the amount of USD 60 Mio expected to be contributed by impact investors surprises. There is a risk of over-subsidization as most (if not all) investment related to the 20\*20 Initiative are of hybrid capital and therefore are co-financed with public resources in order to mitigate private investor's

- risk. Germany in this context suggests identifying impact investors/investment funds and their concrete investment plans in the region as well as describing the (formal) relationship between IDB and the mentioned investors and the envisaged strategy/safeguards to avoid over-subsidizing (doubled public co-finance)
- Regarding “1.4 The proposed alternative scenario”: So far there are neither calculations of investment costs and profitability nor cash flow analyses for the indicated production systems delivered, which are fundamental for sustainable investments. Integrating these analyses in the project document for the most important production systems targeted would strengthen the PIF.
  - Regarding “1.4. Incremental/additional cost reasoning” and “4. Risks”: „An un-bankable risk profile“ has been identified as the principal investment barrier. Other (in our view very substantial) investment barriers are only partly mentioned in the risk analysis (4). Germany considers that it is necessary to describe how to address typical weaknesses of the sector and its stakeholders that represent substantial risks and barriers for investors, as e.g.: Insufficient pipeline of investment ready projects, lack of consolidated and professionally managed entities to invest in, missing capacities of local partners, weak forest governance and enforcement, high level of informality and illegality throughout many forest based value chains, unclear land tenure rights, etc. It would also be useful to describe the resources and structures of necessary technical assistance and how they will be financed.
  - Regarding “1.5. Global environmental benefits and adaption benefits”: a total investment of USD 135 Mio. would result in the restoration of 45.000 ha. Restoration costs/ha are USD 3.000 (without land acquisition). Exemplifying the calculation, including upfront (initial) and maintenance costs of restoration would be useful.
  - Regarding “1.6. Innovation, sustainability potential for scaling up” The additional value for collective learning as „proof of concept“ is only functional, if stakeholders are ready to share (sensitive) financial data. For the effective implementation of the project evidence (e.g. MoU) of intent/readiness of partners to publicly share financial information in order to enable collective learning on risk mitigation instruments may be crucial.

✓ *USA’s Comments*

- The proposal mentions the risk imposed by the seven year growth cycle for trees in the silvopastoral systems; however, the project is only in operation for five years. How will the IADB and project partners ensure the system is properly implemented and maintained if the funding expires before the cycle is complete?
- How, during project implementation, will the IADB account for the fact that (a) land tenure is uncertain and (b) reforestation of degraded land may be expensive and risky due to the quality of the land?
- Will funding be used for land restoration projects in Argentina? If so, is it possible to estimate what proportion of funding might go to Argentina in the future?
- The proposal includes a section on timber and non-timber forest products: will any of these projects include industrial-scale logging?

## MULTI-FOCAL AREA

### 17. Regional (*Brazil, Colombia, and Peru*) - Amazon Sustainable Landscapes Program – IBRD - GEF ID = 9272

#### ✓ Canada's Comments

- Canada generally concurs with the STAP guidance related to this proposal. The program appears to be a worthwhile endeavor and the background rationale for the work is well described. As the program develops, Canada would look to ensure some of its concerns and those raised by STAP are addressed. In particular, we echo the STAP's observation that for a program of this size the technical quality of the Project Framework Document is quite light and should focus less on intentions and more on what is proven/theorized to work.
- We have the following specific comments on the program proposal:
  - Component 1: The discussion on the criteria for identifying priorities for PA investments and the process by which these high priority areas would be identified should be enhanced. For example, the aim may be to identify areas where high biodiversity overlaps with ecosystem services of particular interest (e.g., global climate regulation) or where ecosystem service bundles are evident. Mapping ecosystem services, including participatory mapping, could be useful. It would be assumed that corridors for the flow of species, biophysical processes and functions would be identified as a high priority, but this is not discussed, except in relation to component 2.
  - Component 2: This component notes that it will promote access to land use planning and innovative financing mechanisms. It should be made clear whether this project will enable a comprehensive regional land use planning approach to help structure and manage land use in the region. If a payment for ecosystem services scheme is to be implemented, a mechanism for the measurement and monitoring of this scheme must be created. In addition, the discussion on enforcement roles and responsibilities is brief and should be further elaborated.
  - Component 3: We are supportive of the consensus-based, collaborative approach to identifying appropriate policies and regulations. While this may mean that little detail can be provided in the Project Framework Document, this component is still vague and further elaboration should be provided on how this approach would take form. STAP's suggestion with respect to reviewing what has/has not worked well in past projects and the application of lessons learned in this context would be particularly useful under this component.
  - The project offers fairly detailed targets, for protected area expansion and GHG emissions, for example, but there is little information provided on how those targets were developed or how they will be reached. We request that more

information be provided on target setting, as well as the measurement against those targets.

✓ **Germany's Comments**

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

Germany welcomes the proposal on the Amazon Sustainable Landscapes Program but seeks clarification on the following:

Regarding the baseline: There are many programmes and activities implemented already in the region, and it is not clear how incremental/additional reasoning will be achieved and measured.

- Germany requests including all ongoing programs aiming at biodiversity conservation, reducing deforestation and enhancing sustainable land use and related to the same sectors and geographies (e. g. ProAmbiente, Peru) as well as already committed finance (e.g. restoration loan Germany-Brazil).
- Germany also suggests describing specific activities and expected impacts in relation to already running programmes implemented and/or financed by governments and public and private donors
- The proposal would also benefit from including lessons learned through existing regional initiatives in addressing the “pan-amazonian” drivers of biodiversity loss and from including a critical analysis of the actual market situation of environmental-friendly production in the Amazon region as well as a cost-benefit analysis of related value chains.

Regarding the Alternative Scenario: The program approach is based on the development of four individual national projects, which lack, although united under the umbrella of the "Amazon region", a clearly laid out regional approach. They are basically a sum of national initiatives, whose objectives and expected results do not show the regional thread and therefore the expected impacts to be achieved in the Amazon biome.

The regional approach does not take into account activities such as the political and technical dialogue undertaken by ACTO as a regional relevant stakeholder in the Amazon region. It is mentioned that “taking action on regional issues can no longer be postponed, as the Amazon region is increasingly accessible and gaining importance in the development agenda” (pg 17). The prior ignores that notably BMZ financed the Amazon Regional Program (PRA) that supports ACTO for more than eight years. The process of regional cooperation has been approached with specific priorities through the Strategic Agenda for Amazon Cooperation of ACTO, containing actions at regional level to support national initiatives. A clear example is the ACTO thematic agenda in forest and the regional project “Monitoring of deforestation, Forest Use and Changes in Land Use in the Pan Amazon Forest”, started in 2011 by the Permanent Secretariat of ACTO.

- The program should take into account the institutional structures as well as related ongoing regional activities.

Regarding the program framework: General terms and complex concepts are not sufficiently described (e.g. “Integrated management practices” and “innovative mechanisms”)

- It would be very useful to include case specific cost-benefit and feasibility analysis of implicit business-cases.
- Component 1: Include a preliminary analysis of potential new PAs (region, ha)
- Component 2: Integrated Landscape Management, “...(v) Enhancement of institutional capacities to monitor deforestation” should specify the interactions with existing activities such as the regional project Monitoring of Deforestation, Forest Use and Changes in Land Use in the Pan Amazon Forest run by ACTO. The proposal should consider progress already made in this regard.
- Component 3: include evidence of political will in the mentioned government sectors (mining, energy, infrastructure, agriculture) to engage in the program
- Component 4: Capacity building and regional cooperation. The proposal envisages regional cooperation from the perspective of south – south learning, supporting, among other activities a learning platform in priority thematic areas, preliminary mentioned: monitoring deforestation, climate change, forest management. There is a duplication of efforts in relation to the activities and progress that PRA and ACTO have made in this area. Duplications need to be avoided and potential synergies identified and used.

Regarding innovation, sustainability, and potential scaling up

- The proposed program defines its regional character mostly in terms of territorial coverage (83% of the biome), however it does not consider the established institutions and the amazon governance by ignoring the existence and role of the unique Governmental Regional Organization that recognizes the transboundary nature of the Amazon. The regional institutional sustainability is therefore not considered in this proposal.
- Regionally, ACTO is the intergovernmental forum for cooperation in the Amazon. This mandate emanated from the eight Member Countries of the Organization. ACTO and its ongoing regional projects should be considered in the proposal to promote the scaling up of the program.

Regarding socio-economic aspects:

- Predominantly weak organizational capacity of rural population and the informality of forest-based value chains should be taken into consideration as factors to be addressed in order to enhance the dissemination of new land use models.
- In the analysis of socio-economic benefits, direct short-term benefits should be included in order to stimulate adherence to proposed innovations.

Regarding potential risks: The risk that landowners/farmers do not change their land use strategies towards “environment-friendly” land use is underestimated, particularly if immediate economic benefits are uncertain.

- The risk should be reassessed on the base of a cost benefit analysis (from the farmers' perspective) and related mitigation strategies (e.g. long term rural extension programmes) should be included in the framework.
- Include risk mitigation measures/safeguards regarding the risk of land registration leading to an increase in land acquisition, speculation and subsequent forest clearing.
- Add risk mitigation measures to the Columbia Child Project, where they are completely missing.
- Consider risk of over-subsidization and/or contradicting incentives (e. g. upfront finance vs. performance based) through financing by other international donors or domestic governments, include a permanent coordinating mechanism in order to mitigate this risk.

Regarding coordination with other initiatives: Due to the complexity and scope of the program, coordination is a major challenge. We advise to coordinate the program during the planning and implementation phases with all relevant stakeholders (see also comments above) and donors, including GIZ and KFW sector programs in the region.

✓ **Japan's Comments**

- JICA (Japan International Cooperation Agency) will launch the technical cooperation for REDD+ in Amazon in 2016. In this project, JICA plans to upgrade early warning system for deforestation by using satellite images of JAXA's ALOS2, and give training of Remote Sensing. In this GEF project, Geographic Information System (GIS) will plan to use, but the specifications for the system are not clear enough. In order to achieve consistency between two systems, close coordination with JICA is highly recommended.
- Each projects have some training course for capacity development, in order to create synergy between projects, close coordination for training courses with JICA is highly recommended.

✓ **USA's Comments**

- We note that the PFD stipulates that "Additional child projects might be submitted on a rolling basis with a revised PDF. The closing date for submission of child projects will be June 30, 2017."
  - Will the Council have the opportunity to review a revised project framework document with more details for child projects and country participation prior to GEF CEO Endorsement of child projects?
  - Will countries be able to revise their support of the Program after review of the final PFD?



**18. Bhutan - Enhancing Sustainability and Climate Resilience of Forest and Agricultural Landscape and Community Livelihoods – UNDP - GEF ID = 9199**

✓ **Germany's Comments**

Germany welcomes the following PIF but asks that the following comments are taken into account:

Germany agrees with the proposal. Bhutan has already proven its dedication to forest and biodiversity conservation and strengthening the corresponding governance structures. As a mountainous country it is especially vulnerable to the impacts of climate change. We therefore welcome the proposed project to enhance sustainability and climate resilience of forest and agricultural landscapes. We consider the project's concepts and goals as ambitious but achievable.

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

- The proposal would benefit from including realistic quantification of the project outcomes.
- Germany suggests assessing possible synergies between the ongoing ecosystem valuation work carried out in Bhutan in cooperation with UNEP TEEB and achieving the project output “Institutional capacity strengthened for using sector oriented valuation tools to measure economic benefits of a range of forest ecosystem services in the decision making process”.

✓ **Japan's Comments**

- Regarding *the sustainable land management through agriculture and forestry and new livelihood creation* in component 3, Japan recommends GEF to use the knowledge and experience of Satoyama Initiative (SI), which has the vision of realizing societies in harmony with nature and having sustainable use of resources. UNDP is a member of SI, so it is possible to use UNDP's experience for implementation. Under the concept of SI, UNDP have achieved great results through COMDEKS which is in concert with funding by the Japan Biodiversity Fund and GEF-small grant program, establishing community -based programs which can contribute to this new project.
- Furthermore, COMDEKS have already implemented some projects in Bhutan in 2013.
- Japan recommends to use those preceding projects accumulated knowledge, experience, and networks effectively.

Satoyama Initiative <http://satoyama-initiative.org/>

COMDEKS <http://comdeksproject.com/>

## GEF TRUST FUND/MULTI TRUST FUND PROJECTS SUBMITTED UNDER PROGRAMMATIC APPROACHES

### 19. Marshall Islands - R2R Reimaanlok Looking to the Future: Strengthening Natural Resource Management in Atoll Communities in the Republic of Marshall Islands Employing Integrated Approaches (RMI R2R) – UNDP - GEF ID = 5544

#### ✓ France's Comments

- The goal of the project is to sustain Marshallese atoll biodiversity and livelihoods by building community and ecosystem resilience to threats and degrading influences through integrated management of terrestrial and coastal. This project proposal has three major components focused on the expansion of MPA network, improved governance and knowledge management.
- This project is ambitious, but built on solid assessments and realistic approaches.
- We globally support this proposal and would suggest reinforcing the following aspects:
  - secure the collaboration of local communities in this process (participation of stakeholders) ;
  - reinforce the assessment of anthropogenic pressures and vulnerability ;
  - promote and support changes in local practices like trading with fishing companies sea cucumbers, coconut crabs, etc., in exchange for goods, or various pollution, etc.  
:
  - Using the economic leverage and support sustainable economic alternatives activities ;
  - Using the social leverage, informing all stakeholders on natural ecosystem services to address climate change (such as mangroves, etc.).

*Opinion: Favourable*

#### ✓ Germany's Comments

Germany welcomes the following PIF but asks that the following comments are taken into account:

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

- The PIF mentions that RMI received a number of GEF investments in the past 10 years, among them the Micronesia Challenge. The final project proposal should elaborate on how these past activities have contributed to the objectives of the proposed projects and the “Reimaanlok National Conservation Area Plan”.

#### ✓ Japan's Comments

- Following project of JICA is implementing in Palau. One of main themes of this project is to propose rational Marine Protected Areas through analyzing and

- evaluating of natural science and social science data.
- Active sending of these outputs to the Federated States of Micronesia, Republics of Palau and the Marshal Islands in the “Micronesia Challenge”, a natural environment initiative in the Micronesian area is becoming an agreement on all concerned. In order to create synergy between projects, close coordination with JICA is highly recommended.
  - JICA Project
    - Project for Sustainable Management of Coral Reef and Island Ecosystems: Responding to the Threat of Climate Change
    - Implementing Organization : Palau International Coral Reef Center (PICRC)
    - Term of Cooperation: 2013/04~2018/03
    - <http://gwwweb.jica.go.jp/km/ProjectView.nsf/VIEWParentSearch/D8370B66A394652C49257B270079DD2D?OpenDocument&pv=VW02040104>