



CELEBRATING TWENTY YEARS

**GLOBAL ENVIRONMENT FACILITY**

INVESTING IN OUR PLANET

COMPILATION OF COMMENTS  
SUBMITTED BY COUNCIL MEMBERS  
ON THE WORK PROGRAM  
APPROVED BY COUNCIL IN NOVEMBER, 2011

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the Work Program approved by the Council in November, 2011.

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## GENERAL COMMENTS

### ✓ Germany Comments

Germany approves the Work Program June 2011. Attached, please find our comments on several of the PIFs and PFDs with the request to take these into account during the drafting of final project documents.

We welcome every opportunity in which close cooperation between GEF projects and German bilateral cooperation as well as cofinancing agreements are feasible. However, we are concerned that indicative cofinancing by German bilateral cooperation and its implementing agencies such as GIZ and KfW is sometimes mentioned in the PIFs without proper prior consultation (e.g. in this Work Program in project 35. Sustainable Forest Management and Multiple Global Environmental Benefits (Guatemala), GEF ID = 4479). While we do understand that a formal letter for the provision of cofinancing is required only at the stage of the final project document, we expect that initial consultations between the GEF Agency and the potential provider of cofinancing have taken place and have been documented informally in writing before the PIF is submitted to GEF-Sec.

### ✓ Canada Comments

Canada notes with appreciation that this work program is the most robust and one of the largest ever presented to the Council, totaling more than half a billion dollars. The quality of the work program is high, and we commend the recipient countries, the GEF Secretariat and the various implementing agencies for their work. We are particularly pleased that GEF financing for the incremental costs of the projects is supported by co-financing at unprecedented levels – a 1 to 8.6 ratio.

We note that the work program continues to reference a POPs focal area, instead of the Chemicals Focal Area. In fact, it sometimes mentions an Ozone Focal Area, and a Sound Chemicals Management and Mercury Pilot focal area. This should be corrected given the fact that the GEF-5 programming document refers to the Chemicals focal area.

We are pleased to see more chemicals focal area projects presented in this work program. We are glad to see countries starting to focus on actions required to implement the Stockholm Convention. It is unfortunate, however, that no mercury pilot projects have yet been presented.

## BIODIVERSITY

### 1. **Global: Support to GEF Eligible Parties (LDCs & SIDS) for the Revision of the NBSAPs and Development of the Fifth National Report to the CBD – Phase II; UNEP, 4623**

#### ✓ Germany Comments

We would like to emphasize that in the present proposal in general, and specifically under its “Component 2: National Targets, Principles & Priorities of the Strategy”, the Nagoya Protocol on Access and Benefit-sharing (ABS) needs to be taken duly into consideration. The ongoing ratification and implementation processes of the Protocol need to be aligned with and integrated in the revision of the NBSAPs. Processes under the NBSAP revision, such as stocktaking of relevant policies, stakeholder identification / consultations, CHM development etc. should be designed and carried with components that address the provisions and specific requirements of the Nagoya Protocol as well as particular actors relevant for its implementation (e.g. Intellectual property offices, private sector, R&D institutions, etc.).

This “integrated approach” would allow for creating synergies and support mainstreaming of ABS issues into the different policy areas that are relevant for the mutually supportive implementation of the three objectives of the CBD – and not only targeted on conservation and sustainable use (for example, ABS as a potential mechanism to finance biodiversity conservation and help implementing the Aichi targets).

**2. Global: Support to GEF Eligible Parties (LDCs&SIDs) for the Revision of the NBSAPs and Development of the Fifth National Report to the CBD – Phase I; UNEP 4513**

✓ **Germany Comments**

Please see comments above on GEF ID = 4623.

**3. Angola-Expansion and Strengthening of Angola's Protected Area system;  
UNDP, 4589**

✓ *Germany Comments*

The final project proposal should elaborate more clearly on the following issues:

The capacity development strategy should be described more clearly. The question arises how a significant expansion of the protected area system in Angola can realistically be managed in view of the current low institutional and human resources base. To what extent will regional centres of excellence and training institutions be used to address existing capacity building needs for rangers and managers of protected areas (e.g. Southern African Wildlife Centre)?

The proposal should elaborate to what extent the Angolan legislation on forests, wildlife and protected areas allows for the participation of local communities in co-management of protected areas and wildlife, and how the project will address policy gaps taking into consideration benchmarks established in the context of the KAZA Transfrontier Conservation Area (communal conservancy approaches and game management areas). The project should establish mechanisms for exchange and learning from the rich experience of neighbouring countries. The links and synergies with sub-regional and regional programmes and structures (KAZA Secretariat; SADC Secretariat) should be strengthened.

It is emphasized that the project will have a strong focus on protected area finance, taking into consideration that MINAMB and the Forestry Development Institute have one of the lowest budgets in Africa. The project proposal should provide details on the measures that will be taken to identify new funding sources for the PA system.



**4. Bolivia: Conservation and Sustainable use of Agro-biodiversity to improve Human Nutrition in Five Macro Eco-regions; FAO, 4577.**

✓ **Germany Comments**

The project aims to conserve and use agrobiodiversity in a sustainable manner to improve human nutrition in five macro-ecoregions. It is generally in line with current activities of the German development cooperation in the field of agricultural development and natural resource management in Bolivia.

Germany suggests to concentrate in BD 2 (measures to conserve and sustainably use biodiversity incorporated in policy and regulatory frameworks) on the implementation of already existing laws which are favorable for the conservation and sustainable use of agrobiodiversity. These laws do already exist; the problem is their implementation and the monitoring and evaluation of the implementation.

An important additional step to achieve outcome BD 2 would be to build up platforms with the participation of the private sector, the civil society, non-governmental organizations, and representatives of the government in order to coordinate the different activities in the field of agrobiodiversity.

✓ **French Comments**

We support this project which is globally well designed.

We share and would like to emphasize STAP's questions on the project which should be addressed during project development:

- a) The project should better establish the baseline status of agro biodiversity and how agro biodiversity monitoring will be implemented and sustainably financed beyond the project?
- b) The profitability of the agro biodiversity-friendly cultivation practices compared to current agricultural systems should be thoroughly assessed from a micro-economic point of view (level of the smallholders). If this profitability is not secured (which is usually the case, because payment of certification of agro biodiversity-friendly cultivation practices are usually beyond market prices acceptability), the project should establish a sustainable financing strategy for the agro biodiversity-friendly cultivation practices (probably a mix of market prices, labels and transversal assistance from taxes or conservation trust funds to the conservation of Agro biodiversity).

**Opinion: favourable, if the above recommendations (a) and (b) are addressed during project development.**

✓ *Canada Comments*

We note the comment made by the STAP that numerous agrobiodiversity projects have been supported in Bolivia over the years. While coordination and complementarity are clearly explained, we wonder if indeed another GEF-supported agrobiodiversity project in Bolivia is needed, given all of the new priorities and targets established at the CBD COP-10. We also note that the proposal focuses on agrobiodiversity for food security in Bolivia, and focuses on several key local crops. While this is certainly important for Bolivia's food security and should be supported, we wonder if it should be the GEF, with its focus on global environmental benefits, that should be called upon to provide this support.

**5. Botswana: Improved Management Effectiveness of the Chobe-Kwando-Linyanti Matrix of Protected Areas; UNDP, 4544.**

✓ **Germany Comments**

The Chobe-Kwando-Linyanti Matrix of protected areas play an important role in the KAZA transfrontier conservation area. Therefore it is recommended that:

The KAZA Secretariat should also be seen as key stakeholder (B.5.), and the final project proposal should elaborate on mechanisms for cooperation at the regional and transboundary level.

Coordination with other related initiatives: German Financial Co-operation (KfW) is a key donor at KAZA level with support including infrastructure development in the Chobe National Park. Within the efforts of donor coordination the implementing agency should actively seek contact in order to ensure synergies and complementarities. Such coordination will also be important with regard to socio-economic development measures linked to nature-based tourism and sustainable utilization of natural resources.

At the SADC level, German Technical Cooperation (GIZ) provides support to the implementation of regional programmes, including the SADC Regional Fire Management Programme and SADC Programme on Transfrontier Conservation Areas. It is recommended that in the final project design reference is made to these regional programmes and that regional authorities are consulted for improved coordination and cooperation.

The risk assessment should consider the risk of climate change on project objectives.

✓ **French Comments**

The project tries to develop an integrated landscape approach to strengthen protected area management within the globally important 14,282 km<sup>2</sup> Chobe-Kwando-Linyanti matrix of PAs, comprising Chobe National Park and 6 Forest Reserves, and in surrounding buffer areas covering 2000 km<sup>2</sup>.

The project operates through two main components:

- Component 1: Strengthening Core PA functions to Address Existing and Emerging Threats to Biodiversity
- Component 2: Establishing Collaborative Governance to Address Threats in the PA and Buffer Zones

The project is well designed and there is no question with the justification and importance of the intervention in this globally significant area. The project strongly emphasizes its objective to tackle through a holistic manner the emerging threats to the biodiversity of the landscape.

We are particularly concerned with the wild fire management threats. If the project seems based on a sound approach to try to control the pressure of wildfire, it remains very weak in assessing the cause of wildfire. Particularly, the PIF should present a thorough technical, social and economical assessment of the social groups at the origin of wildfire, the reason of their practice of wildfire, and what could be the alternatives activities or practices that could be proposed to them. Trying to manage the pressure is good, but managing the cause of the pressure is better.

In this regard, the component 2 dedicated to collaborative governance is even not designed at trying to engage a dialog and improvement process with the groups at the cause of this threat. (this component is mainly designed at involving communities in establishing regulation and enforcement in within PA and buffer zone, but not in trying to develop alternatives to the causes of the threats).

The same question will apply to poaching, increase encroachment into wildlife dispersal areas and unsustainable utilization of natural resources within and in adjacent lands of the PA. For the unsustainable use of natural resources, no technical and economical assessment proves that “joint natural resource management system” will not increase cost of verification and lower profitability for local stakeholders. Such an assessment is considered necessary to support this part of the project.

Without necessarily advocating to go back to Integrated conservation and development projects (ICDPs), the project would be strengthened if additional funding was invested by the national agency in charge of rural development to assist this project in supporting adapted alternatives to the causes of the main threats identified by this project. If the Government of Botswana is ready to invest 4,695 M \$ for conservation in co-financing of this project, it could be explored whether GoB could try to mainstream and coordinate rural development actions in this area to develop a more comprehensive strategy of biodiversity conservation.

Mainstreaming biodiversity in all sectors is repeatedly called for in international arenas, but to date mostly remains a concept. This project is an opportunity to translate the concept into action.

**Opinion: favourable, if the management of threats causes is integrated into the project and addressed during project development.**

**6. Brazil: Marine and Coastal Protected Areas (GEF MAR); IBRD, 4637**

✓ **Canada Comments**

Canada would like to congratulate Brazil and the World Bank for developing a quality proposal in the “Brazil Marine and Coastal Protected Areas” project, and showing a solid commitment to expanding marine protected areas in Brazil. We also believe that the involvement of Petrobras in this proposal is positive and will no doubt provide a good example for enhanced engagement of the private sector through GEF projects. The STAP makes some good suggestions to further improve the proposal, which we look forward to seeing when it is presented for approval.

**7. China: CBPF-MSL Main Streams of Life – Wetland PA System Strengthening for Biodiversity Conservation (PROGRAM); UNDP/FAO, 4646**

No comments received.

**8. China: Securing BD Conservation and Sustainable Use in Huangshan Municipality Biodiversity; FAO, 4526**

✓ *Germany Comments*

*Component 1- policy, planning and institutional arrangements:* In many projects the design and formulation of policies is one of the main objectives. However, it is not only policy formulation but rather the implementation of the policy that needs to be taken care of by the project. Here we suggest including activities and indicator(s) that show that policy implementation is being tackled. One activity could be the formulation of guidelines on how to implement the relevant policy.

*Key stakeholders:* We suggest including the Department of Agriculture at municipal level as one of the stakeholders when it comes to discussions with local communities and rural landholders on developing sustainable/alternative livelihood activities.

*Sharing Benefits from National Scenic Reserve (NSR) and Protected Areas (PA):* In many cases income from the National Scenic Reserve is not shared with local communities living in the reserves or protected areas. This has many reasons; amongst others are strict budget allocations and/or administrative hurdles. The project covers this aspect partly by providing alternative/system livelihood options. However, the project should look into possibilities and ways of how communities could be allocated a certain percentage of the annual income from the national scenic reserves as direct benefit/compensation for protection and effective conservation of biodiversity. One possibility would be to design an agreement with local communities, specifying their task and responsibility for protection and conservation of biodiversity in those specific areas. The amount can be used for village development projects.

**9. Integrated Semenawi and Debubawi Bahri-Buri-Irrori- Hawakil Protected Area System for Conservation of Biodiversity and Mitigation of Land Degradation; UNDP, 4559**

No comments received.

**10. Jordan: Mainstreaming Biodiversity Conservation in Tourism Sector Development in Jordan; UNDP; 4586.**

✓ **Germany Comments**

A large portion of the suggested project approach seems to depend on co-financing agreements. It should be made clearer to what extent of certainty these agreements will materialize and which components of the proposal would be prioritized in case the budget target will not be met.

The project title suggests “mainstreaming” biodiversity conservation is the main goal of the project, implying that it specifically targets the country as a whole. However, there are only few references in the proposal that refer to activities relating to mainstreaming in the sense of evaluating lessons learned and distributing knowledge gained by project activities across Jordan. We strongly suggest that the project approach include a significant (and budgeted) component on the distribution of knowledge gained from the project, ideally not only within Jordan itself but also in exchange with other conservation and protected area projects facing similar challenges across the world.

Coordination with other related initiatives: Reference to page 10 (global environmental benefits): *“By promoting environmentally-friendly regulations and guidelines in the tourism sector the project will also contribute to the reduction of solid wastes and wastewater discharges and will reduce extensive abstraction of water ...”*. In this regard, it is recommended to consider the lessons learned by a Public-Private-Partnership between GIZ and the Hans Grohe AG in grey water recycling at the “Dead Sea Spa Hotel”.

✓ **French Comments**

The project aims at strengthening biodiversity conservation into tourism sector in Jordan. Tourism is one of the most important sector of Jordanian economy and the increasing of visitor number is the threats for Jordanian biodiversity: fragmentation and loss of habitat, uncontrolled plant collection, effluent discharges.

The project will support the strengthening of policy and regulatory framework and improve measures for friendly tourism development. Financial mechanisms to ensure the long-term sustainability of biodiversity protection will be identified by the project. FFEM is funding a project supported by Royal Botanical Garden that aims at identifying mains endangered ecosystems and protecting them. **This project could be linked with this GEF project.**

**11. Mongolia: Network of Managed Resource Protected Areas; UNDP, 4562**

No comments received.

## CLIMATE CHANGE

### ✓ Germany Comments

#### **12. Global (Afghanistan, Angola, Burundi, Central African Republic, Congo, Djibouti, Guinea, Guinea-Bissau, Guyana, Haiti, Cambodia, St. Lucia, Liberia, Lesotho, Malawi, Mozambique, Nepal, Palau, Sierra Leone, Swaziland, Chad, Zambia): Umbrella Programme for National Communication to the UNFCCC UNEP, 4498**

Germany welcomes the Umbrella Programme for National Communication to the UNFCCC and the planned efforts to help the 22 identified SIDS and LDCs to enhance ownership and improve capacity for the production of national communications. The Consultative Group of Experts (CGE) has documented extensively the challenges and risks for NA1 countries seeking to fulfil reporting requirements under the convention, and the UNEP Umbrella Programme should frame its proposal to more completely consider the specific challenges and recommendations set forth by the CGE in the documents FCCC/SBI/2011/5/Rev.1 and FCCC/SBI/2011/5/Add.2.

The CGE identifies several challenges that are not adequately addressed in the proposal, particularly in the section on risks. Please provide additional information about how the following challenges and potential risks could be managed:

**Technical and Capacity Building Challenges:** the umbrella programme seeks to “update and improve” GHG inventories; however, the issue of *how* data for GHG inventories can be improved needs to be addressed, e.g., the development of national emissions factors is one recommendation of the CGE. What can concretely be achieved in the context of SIDS and LDCs where data is notoriously sparse or of poor quality? **Accessing data** is another issue: how will the programme help parties gain access to information that is often in the hands of the private sector?

**Financial Challenges:** one problem that the CGE highlights is the prohibitively high cost of consultants to carry out tasks for NatCom development, which in turn prevents the National Communication process from being sustainable in the long-term. UNEP proposes assisting parties to identify consultants; however, the cost of consultants and the CGE-cited rule against using GEF-funding to pay for civil servants to carry out work is not addressed. What are options for balancing the need for external technical experts with increasing local capacity to manage technical aspects? Are there long-term options for increasing national ownership?

**General observation on NatCom Challenges:** lack of ownership in the NatCom process is a key challenge. Until parties see the reporting requirement as a useful tool for guiding decision-making rather than a burden under the convention, the process will remain unsustainable. The Umbrella Programme is correct to integrate the NatCom findings into national development processes. Please provide more information about how such an integration would work.



**13. Global (Colombia, Kenya, Swaziland): SolarChill Development, Testing and Technology Transfer Outreach; UNEP, 4682**

✓ **French Comments**

The project aims to commercialize and transfer the solar chill vaccine refrigerator and to begin the process of commercializing and transferring the Solar Chill and light commercial refrigerator.

The main outcome of the project is the dissemination of 600 refrigerators in three countries, and supporting the development, certification, promotion of a particular technology, based on three producers. This note raises questions of principles on the use of public subsidy in favor of one specific equipment and three private companies.

The document does not contain at all any analysis of technical, economic and commercial (business plan), market analysis, of this technology. This technology would be hyper-funded, under the justification of research and development.

From a strictly ecological point of view, as outlined in the STAP, the consequences in terms of reducing emissions of greenhouse gases are completely negligible. The cost per tonne of CO<sub>2</sub> avoided equals the amount outstanding of € 1453 per tonne of CO<sub>2</sub> avoided.

Finally, as underlined by the STAP, the issues of maintenance and service are absolutely not mentioned.

**We consider that the project document should address all the above-mentioned issues before it can be implemented.**

✓ **Canada Comments**

We note that this technology has benefitted from over ten years of support from various entities, funds and investors. We wonder, therefore, if additional grant support is what is required. This is particularly relevant given that, after reading the details in the PIF, the proposal is not for technology development, but for demonstration and marketing / market analysis. Perhaps it would be best for the GEF to look at using a non-grant instrument for this project. We also note that the co-financing from the Multilateral Fund of the Montreal Protocol is through a UNDP project. However, UNDP is not mentioned in the project proposal, and it is not clear that the UNDP MLF project is completely aligned with this GEF proposal.

**14. Regional (Bangladesh, China, Mongolia): ASTUD Asian Sustainable Transport and Urban Development Program (PROGRAM); ADB, 4638.**

✓ **Germany Comments**

The objectives and outcomes outlined in the PDF seem well designed to achieve the desired GHG emission reductions in urban transportation.

The project outputs “policy support for low-carbon transport and urban systems and technologies” as well as “improved NMT access” do not fit under the AVOID section under Programme Component 1. These outputs refer to SHIFT to more sustainable modes, without necessarily reducing the need to travel. They should therefore be put under Program Component 2, where reference to NMT is already made.

Under Program Component 2 (SHIFT), possibilities for fostering NMT beyond the access to transit stations should be explored more deeply. NMT should have a higher overall priority, as it is the least GHG emitting mode (zero emissions!). In addition, the SHIFT component should explicitly refer to MAINTAIN, as in many developing cities the issue is rather to maintain the current high modal shares of NMT and public transportation.

With regard to knowledge sharing (component 4), the well established Sustainable Urban Transport Project ([www.sutp.org](http://www.sutp.org)) as well as the current GEF-funded project “Promoting Sustainable Transport Solutions for East African Cities” (GEF Sustran East Africa, <http://www.sutp.org/gefsustran/>) should be considered for knowledge sharing purposes.

✓ **French Comments**

The aim of the program is to support Asian cities in realizing greenhouse gas (GHG) reductions and local co-benefits through the integration of low carbon and climate resilient transit infrastructure and transport services with transit-supportive, low-carbon urban development.

AFD (French Development Agency) is currently considering co-financing a draft corridor express bus to Dhaka with ADB. This request for contribution of the GEF, including the promotion of non-motorized modes, which are complementary modes of bus speed, is y in the right direction. The program is quite consistent and will benefit from a French commitment in Bangladesh through a French Development Agency soft loan.

With regard to funding multi-country and multi-object, the main issue could be the method of monitoring and evaluation of operations financed which are quite disparate.

**Opinion: favorable**

✓ *Canada Comments*

We are particularly impressed with the regional programmatic approach “Asian Sustainable Transport and Urban Development Program (ASTUD)” (ADB/World Bank) in Bangladesh, China and Mongolia which seeks to support Asian cities in realizing GHG emission reduction and local co-benefits through the integration of low-carbon transit structure. The program expects direct GHG emission reduction of 17 to 18 million tons of CO<sub>2</sub> equivalent, and includes co-financing of \$988 million.

**15. Bangladesh: Development of Sustainable Renewable Energy Power Generation; UNDP, 4459.**

✓ **Canada Comments**

We share the STAP's concerns on why / how the three specific renewable energies were selected. We also note that the type of private sector co-financing included in the proposal is listed as "unknown". This should be clarified as the project proposal is further developed. We note that this sector can be particularly attractive for private sector investment.

**16. China: Hebei Energy Efficiency Improvement and Emission Reduction Project; ADB, 4621**

No comments received.

**17. Colombia: Third National Communication to the UNFCCC; UNDP, 4619.**

✓ **Germany Comments**

Germany welcomes the proposal for Colombia's Third National Communication. For the final project proposal, please expand consideration of different potential risks to address how specific problems faced in the first and second national communication processes will be addressed. Please also address how some of the typical reporting problems, such as availability and quality of data for GHG inventories, coordination between institutions to foster ownership of the national communication process (the PIF mentions a NatCom "team", please describe the make-up of the team), as well as availability of technical expertise to perform the various functions, will be managed for the TNC. What steps will be taken to ensure continuity of processes in the future?

**18. Liberia: Lighting One Million Lives in Liberia; IBRD, 4336.**

✓ **French Comments**

The broad objective of the project is to support the development of sustainable energy supplies and services in this country. The project further aims to support capacity strengthening and policy regulations for market development in Liberia, and specifically aims at promoting solar energy for the rapid scale up of access to modern lighting.

The following issues could be addressed during the full project development:

1. Rationale for focusing on the technology of solar lanterns;
2. Sustainability of lighting programme: During the next phase of the project cycle, sustainability of the lighting programme post GEF project period should be considered to show how lighting programme would expand and continue beyond the GEF project period. Furthermore, the PIF states that under the baseline scenario households are paying very high cost for diesel fuel based power generation. A solar lantern would cost around \$40 with a potential net cost of \$29 for the households. This could be a potential barrier for many poor households and this risk/barrier needs to be addressed;
3. Recycling issues: CFL are highly polluting to the environment in case of uncontrolled release or breakage due to the mercury they contain. Recycling of the lamp in a dedicated circuit is required to limit the impact on the environment.
4. Health issues: the French Agency for Food, Environmental and Occupational Health Safety (ANSES) has published its expert appraisal on the health issues surrounding lighting systems using LEDs; such a study has never been carried out before. Because of their low electricity consumption and high efficiency, lighting systems using LEDs are at the forefront of technology in terms of energy performance and are well-fitted to play a role in energy-saving policy. However, risks have been identified concerning the use of certain LED lamps, raising potential health concerns for the general population. The principal characteristic of diodes sold for lighting purposes is the high proportion of blue in the white light emitted and their very high luminance (“brightness”). The issues of most concern identified by the Agency concern the eye due to the toxic effect of blue light and the risk of glare. ANSES recommends that only LEDs belonging to Risk Groups similar to those of traditional lighting systems be accessible to the general public, with higher-risk lighting systems being reserved for professional use under conditions in which it is possible to guarantee the safety of workers. Furthermore, ANSES emphasises the need to reduce the perceived luminous intensity, in order to mitigate the risk of glare. The project should integrate this health risk.

**Opinion: we strongly urge that the comments above be taken into account**

**19. Suriname: Development of Renewable Energy, Energy Efficiency and Electrification of Suriname; IADB, 4497**

✓ **Germany Comments**

We support STAP comments in that an assessment of the cost-effectiveness and mitigation potential of different RE technologies should be performed before a decision is taken on which technologies are applied as pilot projects under component I and III. Such assessment should also consider the scaling-up potential of RE and EE technologies taking into account the national circumstances.

With a view to promoting a broad sustainable project impact, further project development should put more focus on how the pilot demonstration projects will lead to the adoption of clean technologies beyond the project boundary, i.e. across the country. The proposal to disseminate successful experiences, while indeed important, might on its own be insufficient as an upscaling strategy.

The project will contribute to the improvement of the enabling environment for private sector investment by putting in place a regulatory framework and by supporting techno-economic analysis of RE technologies. However, the proposal does not adequately consider the key role of the private sector as investor, technology supplier, plant operator or regarding maintenance of technologies. Further project development should therefore take a closer look at training and capacity development needs of the private sector in Suriname and include measures to address these needs. For example, there might be a need to train local banks on the specific benefits and challenges of RE and EE investment.

✓ **French Comments**

The main objective of the project is to promote the use and development of Renewable Energy and Energy Efficiency systems and technology in Suriname. The proposal aims to address both renewable energy and energy efficiency.

The PIF raises from us the following observations:

1. The document establishes a link between the increase in diesel prices and deforestation. However, the two power sources (diesel and biomass) are not easily substitutable to each other in their uses. In other words, deforestation and land degradation is probably not due to the substitution of the use of diesel fuel from biomass. Biomass is generally used for cooking, diesel fuel is used either as final energy in engines, either as primary energy for electricity generation. In the Surinamese hinterland, electricity can be used for cooking. The development of renewable energy will have little or no impact on the use of biomass energy and thus deforestation / land degradation. We share the STAP's recommendations on the need to analyze the causes of deforestation and to analyze the opportunity of energy efficiency technologies and renewable energy to reduce it.

2. A public policy on energy efficiency is not just the building. A more comprehensive approach to energy efficiency is necessary incorporating all sectors (industries, services, etc.). It is therefore necessary to establish a diagnosis of global consumption and energy efficiency potential before proposing solutions.
3. The project encompasses several themes: production of electricity from renewable energy sources (solar, biofuel) energy efficiency. It may be too dispersed if not previously established a coherent analysis of the sector.
4. The project aims to develop pilot projects using renewable energy resources grant: installation and investment in pilot projects for renewable energy and energy efficiency. It is stated that the GEF funds help to finance investment. This approach involves significant risk in terms of sustainability. There is a:
  - Risk of excessive subsidies of these pilot projects making projects financially unsustainable, or not duplicable (and thus making the term "pilot" inappropriate) because of their lack of profitability without subsidy in investment or operating cost;
  - Risk of lack of integration within a consistent pricing policy for electricity, making supporting subsidy charges too high to be sustainable;
  - Risk of failure to build a lasting and sustainable policy for the public finances;
  - Crowding out the private sector and lack of public-private partnership to work on incentive schemes and technical and economic sustainable for considering a financial sustainability of these operations.
5. The PIF mention the difficulty of maintenance of diesel group in Hinterland. The renewable energy could have the same difficulties
6. The project proposes to fund the installation of weather stations. How this logic of investment subsidy can it be sustained?

**Opinion: we strongly urge that the comments above be taken into account.**



**20. Global: Standardized Methodologies for Carbon Accounting and Ecosystem Services Valuation of Blue Forests; UNEP, 4452**

No comments received.

**21. Regional (Comoros, Mauritania, Mozambique, Tanzania): LME-EA Scaling Up Partnership Investments for Sustainable Development of the Large Marine Ecosystems of East Asia and their Coasts (PROGRAM); IBRD, 4635**

No comments received.

**LAND DEGRADATION**

**22. Moldova: Agriculture Competitiveness Project; IBRD, 4630**

No comments received.

**23. Samoa: Strengthening Multi-sectoral Management of Critical Landscapes; UNDP, 4550**

No comments received.

## MULTIFOCAL AREA

### **24. Global: ABNJ Global Sustainable Fisheries Management and Biodiversity Conservation in the Areas Beyond National Jurisdiction (PROGRAM); FAO/UNEP, IBRD, 4580**

As a fishing nation, Canada supports the initiative. Poorly managed international fisheries resources and illegal fishing operations undermine a nation's domestic efforts at strong fisheries management, reduce fishing opportunities for fish harvesters, and undercut international prices for globally trade fish and seafood products. Initiatives, such as the FAO Compliance Agreement, Port State Measures Agreement, International Plan of Action on Illegal, Unreported and Unregulated Fishing, and Global Record of Fishing Vessels, are regarded as key activities in the fight against illegal, unreported and unregulated fishing, although implementation of these initiatives can be costly for many States, due to the need for capacity building, creation of global databases, and creation of information sharing mechanisms. Science for stock assessments is constantly being improved; science for ecosystems affected by fishing activities is a relatively new area of investigation and much science still remains to be developed, particularly to support policy priorities, such as the identification and protection of vulnerable marine ecosystems from impacts of some fishing activities. Basic data collection is often lacking, which undermines the ability not only of States to undertake management efforts, but also for regional fisheries management organizations to establish robust science-based recommendations. Biodiversity conservation can be improved through better science understanding, which in turn is based on proper data collection of fishing levels of target fish species, bycatch species, and biological characteristics, species interactions, and Habitats. Canada continues to support efforts to improve management and enforcement of the world's fisheries along with efforts to identify and protect marine biodiversity components through global cooperation and coordination, capacity building and improved science, which this initiative will help to address. The Program on Global Sustainable Fisheries Management and Biodiversity Conservation in Areas Beyond National Jurisdiction is an innovative program and GEF involvement in this area is crucial because it will bring together countries and the fishing community at all points along the processing line, including industry and relevant global agencies and conventions thereby enabling a new framework and a way forward in ABNJ. The proposed multi-focal area program consists of four projects that will promote efficient and sustainable management of fisheries resources and biodiversity conservation in the ABNJ, in accordance with the global targets agreed in international forums.

**25. Global (Cuba, Egypt, Ethiopia, Indonesia, Iran, Kazakhstan, Madagascar, Malaysia, Peru, Papua New Guinea, Turkey, Tanzania, South Africa): Fifth Operational Phase of the GEF Small Grants Program - Implementing the program using STAR resources I; UNDP, 4541**

✓ **French Comments**

The project's objective is to use the STAR resources to contribute to the GEF/UNDP Small Grants Programme (SGP) Fifth Operational Phase. It recalls that: "Through its first 18 years, SGP has supported 2,846 community-level projects with over \$64.3 million in funding, leveraging over \$96.7 million in cash and in-kind co-financing in the countries covered by this PIF."

This SGP STAR funding will support at least 649 projects (should the maximum grant amount of \$50,000 be utilized) to as many as 1,298 projects (at the average grant making of \$25,000 per project). More than 724 CSOs are expected to be engaged in SGP projects in OP5.

The project try tackle the following issue: "Sixteen SGP countries with more than \$15 million STAR, have no access to the global core fund for grants, and it is critical for these countries to obtain sufficient STAR funds to sustain the Country Programmes' grant-making activities. This PIF is intended to obtain STAR funds to cover the grant allocation of **these sixteen SGP Country Programmes**, so that GEF continues to channel funds to CBOs and CSOs in these countries."

First, we would like to stress that the names of these sixteen countries are unclear, as the Project detail only mention thirteen of them: "Cuba, Egypt, Ethiopia, Indonesia, Iran, Kazakhstan, Madagascar, Malaysia, Peru, Papua New Guinea, Turkey, Tanzania, South Africa". Which are the three other countries?

We recognize the value of the initiative and share STAP appreciation and broad support of the small grants program (SGP) overall.

Nevertheless, recognizing the justification of the program shouldn't prevent to permanently look for improved monitoring and efficiency of such program. And in this regard, after 18 years, we think that the PIF long general argumentation of SGP justification and SGP output indicators in terms of number of small projects financed is no more sufficient and satisfactory.

Several issues should be addressed to improve the new SGP phases:

- a) The expected outputs of the project Framework should be completely revised and instead of number of project funded, it should set output indicators in terms of biodiversity conservation, climate change attenuation or adaptation, desertification/land degradation reduction, transboundary waters management, POPs reduction and concrete indicators of CBOs/CSOs capacities improvements.

- b) The purpose of the SGP remain unclear between a long term assistance to all CBOs/CSOs project in each SGP countries (without clear phasing out strategies or capacity improvement process with clear steps) or the purpose of creating sustainable and long lasting capacities amongst CBOs/CSOs beneficiaries (then with a clear purpose of steps by step improvement and capacity building goal).

In one hand the PIF state that SGP should continue to fund CBOs/CSOs beyond this past 18 years because “The programme is a critical resource for SGP’s partner organizations and communities, without which their available support channels would be reduced and their ability to confront environmental issues limited (p16).” This seems to mean that without this new SGP phase, investments made in the past 18 years in CBOs/CSOs would be lost.

On another hand, the PIF state that “SGP will continue developing capacity of civil society organizations (CSOs), with priority for community-based organisations (CBOs) and indigenous peoples organisations” and “To ensure sustainability of community capacity, SGP will ensure beneficiaries of capacity development are rooted in and deeply connected within the communities, so when projects are completed, the knowledge and technical skills remain within the communities to continue carrying out environmental protection activities.” In this case, the PIF should clearly put output indicators in terms of CBOs/CSOs with sufficient sustainable capacities instead of number of CBOs/CSOs’ funded projects.

Our recommendation is to clarify the role of SGP in terms of capacity building output and methodology to help low capacity organizations to reach a point of sustainable capacities to manage global environment issues. We suggest SGP to put in place new challenging output like CBOs/CSOs increased leveraging funding capacity indicators, or goals of helping CBOs/CSOs moving from SGP small grant management to medium size or even full size project management.

- c) One shouldn’t avoid recognizing adverse effects of SGP on the field after 18 years of operation in some countries. One known adverse effect in some SGP countries is the development of CBOs/CSOs projects brokers who are “selling” to community to other community the drafting of the same type of project which is perfectly fitting with SGP criteria and get usually selected for funding against a % fee of the amount awarded by SGP to the community. It would be good that SGP monitoring tools track for example if the exactly same template of projects are funded other different communities and time within one SGP country program. Other kind of area of improvement could be assessed. Currently the PIF doesn’t provide information on its assessment of areas of improvement for the future.

**Opinion: favourable if the above recommendations (a) (b) and (c) are addressed during project development.**

**26. Regional (Algeria, Egypt, Jordan, Morocco): MENA-Desert Ecosystems and Livelihoods Program (MEA-DELP). IBRD; 4620**

✓ **Germany Comments**

The concept of «desert ecosystems» is not clearly explained. Is it about deserts being arid, but productive ecosystems and their degradation or does the project refer to drylands and desertification in a larger sense?

The project seems to focus on the local level, intending to provide for a network of demonstration sites. All countries concerned have long standing experiences in SLM practices (Morocco: GIZ and WB projects, Jordan: GIZ, WB, ACSAD projects, ...) We recommend to put more emphasis during the further elaboration of the project concept on the identification of best practices and strategies for upscaling them.

Algeria: Dryland agriculture depends on the North Sahara Aquiferes, being a non-renewable overexploited water resource. Impact of the project on the NSA should be explored and explained.

Value chains for desert products are one action line. We recommend to further elaborate on certification, e.g UNDP has developed a Fair wild certification for MENA countries that might be a good reference.

We recommend as well to further explore linkages with existing projects such as

1. GIZ : Regional Silva Mediterranea
2. GIZ : Adaptation au changement climatique, Morocco
3. FAO : Adaptation to climate change in forest ecosysteme, MENA
4. Others

Please specify the key partners and focal points of the national projects. What is the role of the respective UNCCD FP?

**27. Regional (Central African Republic, Cameroon, Niger, Nigeria, Chad): LCB-NREE Lake Chad Basin Regional Program for the Conservation and Sustainable Use of Natural Resources and Energy Efficiency (PROGRAM); AFDB, 4680.**

✓ **French Comments**

The goal of the program is to conserve the water and agro-sylvo ecosystems of Lake Chad Basin through improved governance and integrated ecosystem management to ensure the sustainability of the resources and improved food security and water quantity and quality.

It aims at mitigating the threats to the stability of the ecosystems, the rehabilitation of degraded lands and the conservation and sustainable exploitation of the biodiversity. It will also contribute, through demonstration actions such as plant cover restoration measures, to reduce land degradation and boost carbon sequestration reserves. It will address the causes of soil impoverishment through participatory protection of source heads (notably in CAR) and banks. It will provide significant world ecological benefits through biodiversity restoration and increased fuel energy capital.

To complete this program (AfDB/GEF) and another current program (Prodebalt), FFEM is expected to implement a new project that aims to support the Lake Chad Basin Strategic Action Program. The objective of the project is to develop a decision making tool for the lake sustainable management. FFEM contribution is 0.8 M Euros.

**Opinion: favourable.**

**28. Regional (China, Cambodia, Lao PDR, Myanmar, Thailand, Vietnam):  
Greater Mekong Subregion Forests and Biodiversity Program (GMS-FBP);  
ADB/IBRD, 4649**

✓ **Germany Comments**

We have concerns that the program with a high volume of funding and a quite short implementation period requires a significant capacity for coordination. The timing of the different projects under the program will be very important. How will the implementing agencies ensure the proper timing of the different projects and the timely implementation of the regional program? We therefore request, that all settings for implementing the national projects are well defined and in place before the regional project starts, to ensure that there is no delay for the regional project.

**29. Regional (Comoros, Mauritania, Mozambique, Tanzania): LME-EA Scaling  
Up Partnership Investments for Sustainable Development of the Large Marine  
Ecosystems of East Asia and their Coasts (PROGRAM); IBRD, 4635**

No comments received.

**30. Belize: Management and Protection of Key Biodiversity Areas; IBRD, 4605**

✓ *Germany Comments*

The project focuses mainly on terrestrial key biodiversity areas (KBA) and forest management. Belize's marine and coastal ecosystems provide for much of the country's income (tourism, fishery) and cultural identity (reef recognized as World Heritage site) – but these are highly sensitive to human and climate change impacts. According to Belize's NBSAP, the negative influence of land-based activities is very marked and affects the program for Marine Protected Areas (MPA); thus integrated conservation and development approaches are needed. The multi-sectoral linkages for the integrated management of coastal resources are showing first results in Belize, but need to be consolidated and incorporated into the design of new measures.

The full proposal should therefore clearly identify how:

- Belize's approaches in Integrated Coastal Management (ICM) will be linked with the proposed forest/ terrestrial KBA management activities;
- Concrete synergies will be built with the World Bank / GEF project on the Mesoamerican Barrier Reef System (MBRS II).
- Integration in the greater regional context is planned, e.g. Mesoamerican Biological Corridor, SICA, and specifically in the context forest & climate change with the REDD Programme of the Comisión Centroamericana de Ambiente y Desarrollo (CCAD-GIZ).

**31. Bhutan: Sustainable Financing for Biodiversity Conservation and Natural Resources Management; IBRD, 4579**

No comments received.



**32. Brazil: Fifth Operational Phase of the GEF Small Grants Program in Brazil; UNDP; 4560.**

✓ **French Comments**

We globally support the Brazilian SGP initiative.

The project objective is to contribute to the conservation of the Cerrado and Caatinga biomes of Brazil through community initiatives on sustainable resource use, and actions that maintain or enhance carbon stocks and increase areas under sustainable land management.

Interestingly this project proposes much more result oriented outputs than the global project 4541, showing that such design work is feasible. Moreover this country programme is directed at two main geographical areas/biomes, while the global project 4541 doesn't provide some clear assessment of geographical needs and focus in each of the sixteen countries of interventions.

Globally the Brazilian 5th Operational Phase of the GEF Small Grants Program is well informed and seems based on sound experiences. We regret that the PIF lack of an assessment of previous SGP supports, successes and failures and the current capacity building status and needs of the Brazilian grant beneficiaries. There is some general and very broad information on the Brazilian SGP program activities p12, but little if no detailed outcomes statistics and numbers on the results: how much sustainable activities generated? Sustainable income generated? How much SGP grantees have sufficient capacities, are now leveraging funds on their own and are no more SGP "clients" compared to how much grantee have benefited from 2, or 3 or event 4 successive SGP grants? Etc.

Some of the questions raised for the global project 4541 apply to the Brazilian SGP program:

- The description of the socioeconomic benefits to be delivered by the Project is not convincing (p16). It states that: "Small grant projects will support activities that improve the communities' quality of life (e.g., food security, improved water quantity and quality), generate income, and enable them to stay on their land while also achieving global environmental benefits" but doesn't explicitly demonstrate if those activities are profitable and can last beyond SGP support or if those activities can only be maintained with grants from the SGP (and need to be subsidized to be sustainable over the long term). The Brazilian SGP (using its previous experience in country) should provide precise information on the amount and sustainable amount of income generating activities which can be developed with the SGP, and clearly state if those activity are not profitable and need subsidize over the long term by SGP, or if they are profitable and self sustainable. In this regard, the chapter in p11 and 12 about "Barriers to communities' contribution to biodiversity conservation, sustainable land management and

maintenance of carbon stocks in the Cerrado and Caatinga biomes” let think that most of the incomes generating activities supported by SGP are probably not sustainable without permanent subsidizing from SGP. Some clarifications are needed on the objective of the SGP in this matter.

- Because of the above difficulty (and like the global SGP 4541), the purpose of this Brazilian SGP remain unclear between a long term assistance to all CBOs/CSOs project in the two biomes (without clear phasing out strategies or capacity improvement process with clear steps) or the purpose of creating sustainable and long lasting capacities amongst CBOs/CSOs beneficiaries (then with a clear purpose of steps by step improvement and capacity building goal).

**Opinion: favourable, if the sustainability of activities supported and clear goals to bring some Brazilian CBOs/CSOs in capacity to continue to work without SGP assistance are addressed during project development.**

**33. Burundi: Watershed Approach to Sustainable Coffee Production in Burundi; IBRD, 4631**

No comments received

**34. El Salvador: Climate Change Adaptation to Reduce Land Degradation in Fragile Micro-Watersheds Located in the Municipalities of Texistepeque and Candelaria de la FronteraL; FAO, 4616**

No comments received

**35. Guatemala: Sustainable Forest Management and Multiple Global Environmental Benefits; UNDP, 4479.**

✓ **Germany Comments**

The proposed project claims that more than 80% of the co-financing volume (i.e. more than 60% of the total project costs) is contributed by the “Dry Forest Project” of the German development Bank (KfW). We note that there is no agreement yet between UNDP (GEF-Agency in charge for the proposed project) and the KfW-program on this potential co-financing.

✓ **French Comments**

The project is an important contribution to Guatemala sustainable forest management (SFM) and sustainable land management (SLM). The project will implement two main components. The first will integrate principles of SFM and SLM in the regulatory and institutional framework, and strengthen integrated environmental land management capacity. The second will support pilot projects for SFM/REDD+ and SLM reduce land degradation, improve carbon stocks, and enhance biodiversity conservation in south-eastern and western Guatemala.

The project will involve major executing partners like MARN, CONAP and FUNDAECO which is a well known partner from FFEM. FUNDAECO present very strong experience records. One previous FFEM’s grant to FUNDEACO went through a final independent evaluation in 2010 which delivered a very satisfactory opinion on the projects outcomes and the NGO administrative capacities.

We recognize the value of the initiative but we share and even strengthen the STAP concerns and recommendations on project revision.

Yet, we would like to share several threats on the projects which were raised by our recent independent evaluation of our previous supports to the Guatemala and which are not clearly addressed in the PIF. The following issues should be addressed during project preparation:

- a) The project stress that 40 % of forest loss in Guatemala is due to illegal logging in PAs. The project lacks of an assessment of which social groups are involved in illegal logging activities. Our evaluations and several independent organizations in Guatemala can provide evidences that narcotrafficants willing to operate money laundering by investing in large Fincas and extensive cattle ranching are threatening smallholders to sell their lands or bribing local officials to convert land in agribusinesses outside, in periphery and sometimes in PAs. Our evaluation call for strong law enforcement, control and vigilance of land tenure and protected areas, particularly to protect small holders benefiting from PINFOR our PINEP assistance from being forced to sell their lands. Our recommendation is that the project should consider assisting the Guatemala State in securing more internal budget and capacities (notably from joint patrols of CONAP, Police and Army forces which are already operating in some places) to protect smallholders against narcotrafficants’ land grabbing pressures.

- b) The project doesn't recognize the effort made recently by CONAP and FUNDAECO to increase the involvement of local indigenous communities in Protected Areas co-management schemes. The current PA laws in Guatemala don't allow local communities to participate in PAs co-management schemes. Previous pilot projects were implemented with the help of Netherland and France and demonstrated that co-management schemes were feasible (examples are already in places in the Izabal Province). Using Municipal Development Councils (as stated in the PIF p 10) is not operating to involve local indigenous communities in PAs co-management and involvement in benefits and protections activities. Our recommendation is that the project should support the PAs institutional framework and help CONAP to pass adequate legal bills to officially establish PAs co-management schemes with local indigenous communities. Integrating local indigenous communities in the co-management of PAs is the best way to reduce the numerous conflicts existing between the CONAP's PA system and local indigenous communities associations around illegal activities and land claims.
- c) The FFEM recently approved a grant of 1.496.000 Euros to FUNDAECO to support CONAP and the Guatemala PA system in three main departments of Izabal, Peten and Huehuetenango. In this third department, the FFEM grant will help FUNDAECO to implement similar activities as the ones proposed in the proposed PIF. As the FFEM's grant to FUNDAECO in Huehuetenango department is not identified by UNDP office in Guatemala, we strongly request that clear cofinancing and coordinating schemes should be establish within this UNDP/GEF project with the FFEM's Grant to FUNDAECO and CONAP in order to avoid any double financing risks.

**Opinion: favourable, if the above recommendations (a), (b) and (c) are addressed during project development.**

**36. Honduras: Delivering Multiple Global Environment Benefits through Sustainable Management of Production Landscapes; UNDP, 4590**

✓ **Germany Comments**

The proposed project aims at intensifying cattle production through sustainable land management practices and enabling favorable conditions regarding policies, markets and finance. Implementing the proposed methods such as planting of trees in pasture, zoning of cattle production, semi-enclosed management of cattle with fodder banks and cut and carry systems or pasture rotation, through a significant number of farmers are very demanding procedures and considered little realistic in the working regions in Honduras for the time, the financial setting and the concept of the project presented.

Market incentives through certified products aiming at better prices in Honduras (and Central America) are related to export products only. Often these are niche products of small farmer groups with only limited impact in area. The local consumer in Central America and especially Honduras does not show capability and willingness so far to reward investments in sustainability. Meat and dairy products in Honduras are principally for domestic consumption with only very limited destination for export.

Results of former KfW-projects in the Río Plátano Biosphere Reserve suggest that intensifying the production system for cattle ranching with increasing per area income leads to rising cattle numbers and does not lower the pressure on forest remnants or slow down the advance of the agricultural/ranching frontier without strong governance control. The nearly absence of state authority and the threats and shortcomings in terms of governance and management are the main reasons that the RPBR has been inscribed on UNESCO's World Heritage List in Danger again. The PIF does not show perspectives to improve this situation. We request that these risks are addressed in the final project document.

**37. Kazakhstan: Improving Sustainability of PA System in Desert Ecosystems through Promotion of Biodiversity-compatible Livelihoods in and Around Pas; UNDP, 4584**

✓ **Germany Comments**

Especially in dry areas such as steppe, desert and semi-desert ecosystems, there are many apparent interlinkages and co-benefits between sustainable management of natural resources, biodiversity protection and adaptation to climate change. We would therefore recommend

a) to elaborate more on linkages and co-benefits between components 2 & 3, between biodiversity and sustainable management

b) to focus more on use and up-scaling of existing best practices of sustainable and decentralized management of natural resources in Kazakhstan, e.g. rangeland and forest management.

c) to widen the project approach to include adaptation to climate change and specifically address aspects of Ecosystem-based Adaptation (EbA) in the Final Project Document, since steppe, semi-desert and desert ecosystem are especially threatened by climate change

Regarding Engagement of NGOs (page 9), Germany strongly supports a strong involvement of civil society organizations in the projects. We would emphasize that there are possibilities to engage NGOs in far more areas than Outputs 1.3 and 3.3.2.

German development cooperation has cooperated with the Association for Biodiversity Conservation in Kazakhstan (ACBK) in areas such as co-management approaches (Output 3.1.), biodiversity monitoring including GIS mapping and monitoring procedures and arrangements (Outputs 2.2, esp. 2.2.2. & 2.2.3) and is therefore aware that NGOs have reached very high levels of professional expertise in such activities. We would therefore recommend to extend the engagement of NGOs to other Outputs than 1.3 & 3.3.2. and specifically build upon existing experience in Kazakhstan, e.g. from the Altyn Dala Initiative.

**38. Malawi: Shira Natural Ecosystems Management Project; IBRD, 4625**

✓ *Germany Comments*

The activities and methodology envisaged to achieve the mentioned outcomes and outputs under each project component need to be elaborated more explicitly, e.g. with regard to the involvement of partners listed and community participation. Thus, in addition to the technical comments of STAP (date of screening: October 8, 2011), more specific reflections on activities and the methodology applied for each project component should be given in the final proposal and reflected in the ongoing reporting requirements.



**39. Russian Federation: ARCTIC GEF-Russian Federation Partnership on Sustainable Environmental Management in the Arctic under a Rapidly Changing Climate (Arctic Agenda 2020); UNEP/EBRD, UNDP, IBRD; 4664**

✓ *Germany Comments*

Germany welcomes the very ambitious GEF Project Framework Document designed to establish a partnership on sustainable environmental management in the Arctic. Improving environmental quality in the Russian territory of the arctic zone is of critical importance to the whole circumpolar Arctic. The proposal notes that the most profound environmental change driver in the Arctic is climate change, where temperatures are rising at twice the global average and that incentives are needed to stimulate energy-savings and rehabilitate environmental hotspots. An ambitious and comprehensive multi-sectoral programme is set forth that is designed to have multiple global environmental benefits in the areas of climate change, biodiversity and international waters.

Germany is pleased to see the significant co-financing structure that is being put into place – indeed the GEF contribution represents only 8% of the total cost of the project – as well as the participation of multiple local and international NGOs, who will bring a wealth of experience and knowledge to the project. The final project documents under this program should contain more information about the co-financing that will be provided by the private sector.

As the program moves forward, Germany would like to support the comments made by the STAP with regard to creating more synergies amongst the global environmental benefits and drawing upon existing studies and sources of information about vulnerability in the Arctic.

**40. Uganda - Addressing Barriers to the Adoption of Improved Charcoal Production Technologies and Sustainable Land Management practices through an integrated approach; UNDP, 4644.**

✓ **Germany Comments**

Germany welcomes the very ambitious GEF Project Framework Document designed to establish a partnership on sustainable environmental management in the Arctic. Improving environmental quality in the Russian territory of the arctic zone is of critical importance to the whole circumpolar Arctic. The proposal notes that the most profound environmental change driver in the Arctic is climate change, where temperatures are rising at twice the global average and that incentives are needed to stimulate energy-savings and rehabilitate environmental hotspots. An ambitious and comprehensive multi-sectoral programme is set forth that is designed to have multiple global environmental benefits in the areas of climate change, biodiversity and international waters.

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As the program moves forward, Germany would like to support the comments made by the STAP with regard to creating more synergies amongst the global environmental benefits and drawing upon existing studies and sources of information about vulnerability in the Arctic.

✓ **French Comments**

The project aim to secure multiple environmental benefits by addressing the twin challenges of unsustainable utilisation of biomass for charcoal and poor land management practices common in Uganda's Woodlands via technology transfer and fuel switch; improved data collection and carbon monitoring; and promotion of SLM and SFM practices.

The program is consistent, well-defined. Risks are well understood.

**Opinion: Favourable**

**41. Ukraine: Conserving, Enhancing and Managing Carbon Stocks and Biodiversity while Promoting Sustainable Development in the Chernobyl Exclusion Zone through the Establishment of a Research and Environmental Protection Centre and Protected Area; UNEP, 4634**

No comments received.

**42. Uzbekistan: Sustainable Agriculture and Climate Change Mitigation Project;  
IBRD, 4642**

✓ **Germany Comments**

We would like to emphasize that the envisioned mitigation impact should be specified and, if possible quantified, as clearly as possible.

Climate Mitigation is only achieved if fossil energies or unsustainable use of biomass are substituted by renewable energy. Therefore, while supplying renewable energies to rural areas has a clear development impact, the additional mitigation impact should be specified as clearly as possible. We would recommend to clarify in the Final Project Document what kind of energy supply (electricity, gas, fuel, biomass) is actually substituted by renewable energies, and to which amount.

Regarding coordination with other related initiatives, we would recommend to coordinate with ICARDA, which has office in Tashkent and Urgench and extensive experience in researching and promoting sustainable agriculture, especially in irrigated areas, in Uzbekistan.

**43. Zambia: Strengthening Management Effectiveness and Generating Multiple Environmental Benefits within and around Protected Areas in Zambia; UNDP, 4639**

✓ *Germany Comments*

With regard to component 1 the project should consider the KAZA secretariat as a key stakeholder. German Financial Co-operation (KfW) is a key donor at KAZA level and within the efforts of donor coordination the implementing agency should actively seek contact in order to ensure synergies and complementarities.

At the SADC level, the German Government through German Technical Cooperation (GIZ) provides support to the implementation of regional programmes, including the SADC Programme on Transfrontier Conservation Areas and the SADC Support Programme on REDD. It is recommended that in the final project design reference is made to these regional programmes and that regional authorities are consulted for improved coordination and cooperation.

**44. Zimbabwe: Hwange-Sanyati Biological Corridor (HSBC) Environment Management and Conservation; IBRD, 4645**

✓ **Germany Comments**

We share the substantial concerns expressed in the STAP screening. The problem analysis is simplistic and should consider existing challenges in the governance of natural resources, including an analysis of the political, legal and institutional framework. A more in-depth review of the CAMPFIRE experiences should be provided, and the scope for reintroducing and improving sustainable CBNRM should be assessed taking into consideration the political and socio-economic conditions. An institutional capacity assessment is missing even though component 3 aims at strengthening technical and institutional capacities for improved “management of ecosystems using a landscape approach”. Bilateral donors are mentioned as the main contributors for funding sustainable alternative livelihood activities under component 1, but are not identified under B.5. (key stakeholders) nor B.6. (Coordination). The PIF contains (spelling) errors which need to be corrected, e.g. “SADAC investing in Transboundary Conservation Areas.”. It is also surprising that SADC is mentioned as a cofinancier. With regard to component 1 (Improving PA management effectiveness), the following issues should be considered:

- The KAZA Secretariat should be seen as key stakeholder, and the final project proposal should elaborate on mechanisms for cooperation at the regional and transboundary level.
- Significant opportunities for sharing lessons and for synergies also exist in the implementation of regional programmes, such as the SADC Programme on Transfrontier Conservation Areas and the SADC Support Programme on REDD.

## POP's

### 45. Algeria - Environmentally Sound Management of POPs and Destruction of PCBs Wastes; UNIDO, 4508.

#### ✓ Germany Comments

It can only be assumed - but it is not clearly expressed - that investment from the private sector is envisaged during project implementation. Therefore, we advise to consult the implementation team of GEF project ID 2770. In this project the valorization of reclaimable material of PCB wastes is used, at least in parts, to meet the costs for ESM.

#### ✓ French Comments

In Algeria, large stocks of PCB-based waste pose financial, technical and environmental problems. Operators in the industrial and energy sectors possess the largest stocks of PCBs. They own 51% of transformers inventoried, of which 30% are owned by several public and private companies, such as the National Company of Electricity and Gas (SONELGAZ). The steel company Arcelor Mittalowns own more than 400 PCB transformers, FERTIAL (group ASMIDAL) 85 transformers, and COTITX has in its' possession 83 discarded transformers.

It was found that more than 5,000 tons of wastes containing PCB- exist in Algeria.

The objective of this project is to reduce adverse effects of PCBs and POPs on human health and the environment in Algeria through capacity building (to manage waste containing PCBs and POPs) and the elimination of use and release of PCBs and POPs waste. The project will establish final disposal processes that can be applied to PCB and POPs waste. It will support sustainable operation of the processes by building institutional and technical capacities for environmentally sound management (EMS) of PCBs and POPs waste.

A critical issue is to involve operators in the project, especially on component 3 "Technical assistance for the ESM of PCBs and planning of phase-out and disposal of PCB waste". That will require dialogue as well as incentives and coercion measures to promote involvement and commitment of those key stakeholders.

**Opinion: Favorable.**

✓ *Canada Comments*

It is not clear if 5,000 tonnes or 2,336 tonnes of PCBs are to be phased out through this project. Additionally, the cost appears relatively high compared to other similar initiatives. One reason may be the focus on disposing of PCB waste domestically instead of taking advantage of available, lower cost opportunities outside of Algeria. We wonder if the GEF should fund this higher cost because Algeria has a preference to dispose of PCB waste within its borders? What is the incremental cost?



**46. China - Municipal Solid Waste Management; IBRD, 4617.**

✓ **Germany Comments**

The baseline scenario is presented in a clear and comprehensive way. However, further clarification is needed as to why the overall release of PCDD/PCDF is expressed according to WHO standards, i.e. TEQ (338g TEQ/a; it is assumed that the number refers to the country) and the possible savings on the other hand are expressed according to the NATO standard, i.e. 22g I-TEQ/a. These savings presume that the pilot project is implemented in the remaining 40 fluidized bed incinerators (it is not clear whether the 40 incinerators refer to the pilot region or to the country).

Assuming that the 22g I-TEQ/a refers to the country, then why are the savings so small compared to the baseline scenario of China of 2004?

✓ **French Comments**

The role of incineration in MSW management has been increasing and will continue to increase due to a shortage of available land for landfills and the incinerators potential ability to generate heat or electricity. Residential waste collected still contains a considerable proportion of plastic bags, packaging materials, while plastics lead to dioxin precursors, both causing PCDD/F generation and release.

The project tries i) to reduce the production of PCDD/F in pilot municipalities by applying best available techniques and best environmental practices (BAT/BEP) to municipal solid waste management and ii) to establish favourable conditions for replication of demonstrated BAT/BEP across China, including policy framework and increased awareness of among city administrators

The project operates through two main components:

- demonstrating modern MSW management practices meeting SC BAT/BEP
- support to replication through strengthening the policy and the regulatory environment building institutional capacity, dissemination and public awareness raising.

It seems to us i) that people's awareness of good practices (at source waste separation) and differences in the dioxin releases and associated health risks from incinerators with and without BAT/BEP, and ii) disseminating the lessons learnt from the project, are critical issues insufficiently developed in the project.

**Opinion: favourable**

✓ *Canada Comments*

On the China Municipal Solid Waste Management project: Canada agrees with GEF STAP comments in that the project focuses on BAT/BEP for incineration of municipal solid waste and, therefore, the reduction of dioxins and furans, instead of looking at upstream alternatives to incineration such as waste reduction, recycling, composting, etc... We also wonder that given that China's municipal solid waste is high in organic matter and has a low calorific value, if incineration is indeed the best option for China's municipal solid waste. Finally, we note that the 2nd most important source of global mercury emissions is the incineration of municipal solid waste. We wonder, therefore, if the GEF should be supporting a project that focuses on this.

**47. Colombia: Development of National Capacity for the Environmentally Sound Management and Disposal of PCBs; UNDP, 4417**

✓ *Canada Comments*

The Colombia “Development of National Capacity for the Environmentally Sound Management and Disposal of PCBs” project provides good engagement with the private sector, and a good level of private sector co-financing. It would be important to clarify in the final project proposal if the project will indeed be able to remove all barriers to safe management and disposal of PCBs, particularly the high costs and the lack of facilities for PCB disposal.

**48. Costa Rica: Integrated PCB Management in Costa Rica; UNDP, 4485**

No comments received

**49. Vietnam - Hospital Waste Management Support Project; IBRD, 4614.**

✓ **French Comments**

In Vietnam, only 65% of hospitals separate waste and only 7% of hospitals have the capacity to properly treat hazardous waste. Hence, only 20 to 25% of hospital waste is treated as hazardous.

The first component of this project aims to strengthen of the policy and institutional environment: (i) create enabling policy environment for effective management of health care waste generated by the health sector, and (ii) strengthen the institutional capacities of relevant ministries and agencies to implement, monitor and enforce health care waste pollution standards and associated management practices.

The second component aims to strengthen the management of waste generated by health care facilities environmentally sound health care and of occupational safety practices. Grants will be provided to finance sub-projects (micro projects) in eligible hospitals (at central and provincial levels), giving priority to larger hospitals (typically larger waste generators) in more densely populated areas.

Two issues should be emphasized:

1°) Capacity building, to shift from incineration practices to environmentally sound solid waste disposal technologies that do not imply burning waste but combine several alternative technologies to treat different types of waste.

2°) as STAP underlines, there is no discussion of handling of destruction residues in the PIF. The project should be developed to address the proper disposal of potentially toxic residues generated by the destruction of health care waste.

**Opinion: Favorable.**

✓ **Canada Comments**

We note that Vietnam has already benefitted from one hospital waste project through the UNDP global project “Demonstrating and Promoting Best Techniques and Practices for Reducing Health-care Waste to Avoid Environmental Releases of Dioxins and Mercury”. We note that there are other priority areas listed in Vietnam’s NIP for the Stockholm Convention that have not yet received any support.

**50. China: CBPF-MSL: Strengthening the Management Effectiveness of the Sub-system of Wetland Protected Areas for Conservation of Globally Significant Biodiversity; UNDP, 4655**

No comments received

**51. Russian Federation: ARCTIC Targeted Support for Energy Efficiency and Renewable Energy in the Russian Arctic; EBRD, 4683**

No comments received

**52. Russian Federation: ARCTIC Integrated Adaptive Management of the West Bering Sea Large Marine Ecosystem in a Changing Climate; UNDP, 4658**

No comments received

**53. Global: ABNJ Sustainable Management of Tuna Fisheries and Biodiversity Conservation in the Areas Beyond National Jurisdiction; FAO, 4581**

No comments received