



GLOBAL ENVIRONMENT FACILITY
INVESTING IN OUR PLANET

COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE
OCTOBER 2014 WORK PROGRAM

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

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CHEMICALS AND WASTE

1. **China: UPOPs Reduction through BAT/BEP and PPP-based Industry Chain Management in Secondary Copper Production Sector in China - UNDP - GEF ID = 6966**

✓ Germany's Comments

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

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

- Germany welcomes the proposed project to tackle the urgent challenges on environmental contamination, taking part in an effort to strengthen institutions and capacity building in secondary copper production in China. It would be helpful to further clarify how the monitoring and evaluation will be implemented and to outline participation of civil society. It is particularly recommended that non-governmental organisations (NGOs) take part in the evaluation and monitoring. It would also contribute to a transparent and participative process to consider not only the industrial needs and objectives and reach the goal of reducing industrial emissions.

✓ USA's Comments

Prior to GEF CEO Endorsement, we request that the UNDP modify this proposal to reflect our technical comments.

- The United States supports this project to reduce uPOPs in China's secondary copper production sector. Overall, we believe the proposed project has the potential to greatly improve environmental and basic human health needs given its inclusion of elements to address key obstacles that often prevent sector-wide improvements and chemical management.
 - In the full project proposal, the United States requests that the UNDP provide additional details about what will be done as a part of this project to help practices used at the demonstration facilities be scaled-up to displace dirtier practices of larger facilities even though, as the proposal notes, the larger facilities are more energy efficient.
 - The United States requests UNDP consider ways in which this proposal may be coordinated with a previous GEF UNIDO project number 4816, which in addition to reducing mercury emissions, also addressed the promotion of sound chemical management in zinc smelting operations. Additionally, we encourage the UNDP to consider how lessons from this project and GEF project 2816 may together be relevant to the implementation of the Minamata Convention on Mercury.

✓ Switzerland's Comments

Overall Commentaries

- In China more than 3 Million tons of copper scrap is recycled per year. Secondary copper smelters are known to be an important source of unintentionally produced persistent organic pollutants (UPOPs), especially of poly-chlorinated dioxins and furans. This explains why more than 70% of the national PCDD/Fs releases from the metallurgical industry originate from the secondary copper production sector (1,133.8 g TEQ/a in 2010).
- The approach consists in the construction of two demonstration plants. These plants will enable the effects of technical measures such as the enhanced pre-treatment of scrap to be evaluated. The efficiency of different systems for flue gas cleaning on the emissions of the existing secondary copper smelters (reverberatory furnaces) can also be measured.
- Because of the big number of existing plants (379 secondary copper smelting facilities) and the complex and expensive chemical analysis of chlorinated dioxins and furans it is reasonable to first evaluate the effect of technical measures in demonstration plants.

Questions, Concerns and Challenges for further Project / Programme Refinement

- If the project shows poor results concerning the achievable reduction of UPOPs-formation the effects of a change in smelter technology should be evaluated in a next step. Modern smelter technologies (as e.g. bath smelters, flash smelters or top jetting lance smelters) are more energy efficient and produce less flue gas.

Conclusions and Recommendations

- Approval is recommended

2. **Colombia: Reducing UPOPs and Mercury Releases from Healthcare Waste Management, e-Waste Treatment, Scrap Processing and Biomass Burning - UNDP - GEF ID = 6928**

✓ Canada's Comments

- Canada strongly agrees with the STAP analysis that the biomass burning component of the project is weak in terms of its link to the generation of global environmental benefits. The main area referred to in this component is the burning of sugar cane fields, with the solution largely focusing on proper programming of field burning, as opposed to diminishing the use of burning altogether. The latter, however, should be explored given the economic and environmental benefits of doing so over the long term. Please strengthen the analysis to help inform the final project proposal.

✓ Germany's Comments

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

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

- Germany supports the proposed project to reduce the negative impacts of biomass burning and inadequate waste disposal and offers the following comments for consideration:
 - Colombia is not the only country facing these problems; it is therefore recommended that

the Colombian experience be published in Best Available Techniques (BAT)/Best Environmental Practices (BEP) guidance and thus made accessible to other Latin American countries to ensure a higher outreach. In addition the use of mercury is also very common in other sectors than the health sector; therefore it would be helpful if this project could account for methods for safe storage and/or disposal of mercury.

✓ **USA's Comments**

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

- The United States is supportive of efforts to reduce the release of POPs and mercury, and supports Colombia in its efforts to take important measures in this area. We also recognize there are many remaining challenges and hope the following technical suggestions will be useful to maximize project impact.
 - The United States strongly supports Project component 4 (to prevent and minimize the generation of unintentional POPs in the metallurgical industry). We think that this component should, like the e-waste component, also look at reducing mercury emissions. In particular, this portion of the proposal talks about scrap vehicles and removal of components that could contain uPOPs. A very simple inclusion could be to include mercury switch removal. Additionally, this component could also look more broadly at measuring and addressing mercury emissions across the sector.
 - The project proposal can be strengthened to provide more detail for how information generated from this GEF project, including from the multiple demonstrations, will lead to broader adoption through replication, scaling-up, or mainstreaming. As drafted, the proposal states information will be published and released to encourage replication of project results. While information sharing is important, it is not clear that it will be enough to provide an incentive for a broader societal/private sector buy in to more sustainable practices across the numerous sectors considered in this proposal.
 - The STAP review noted that a more effective means for reducing uPOPs in Colombia would be to shift away from biomass burning altogether. In lieu of efforts to lessen environmental impacts from biomass burning, we welcome the UNDP and Colombia to consider whether this project offers an opportunity to shift to alternatives.

✓ **Switzerland's Comments**

Overall Commentaries

- Following the establishment of a POPs inventory in 2014, the project addresses the most important sources of UPOPs and Mercury in Colombia. The project shows a broad scope. It will prevent and reduce emissions of UPOPs and Mercury in the treatment of Healthcare waste HCW and of waste electrical and electronic equipment WEEE; in the metallurgical industry, and of UPOPs in biomass burning (sugar cane fields).

Questions, Concerns and Challenges for further Project / Programme Refinement

- The project is generally well founded. However, in the present project status the biomass

burning component could benefit of further evaluation of possibilities and options to further increase the Global Environmental Benefits of the project. The solution for reducing the emissions due to this practice is sought in an optimized programming of burning. However, the sugar industry knows other economically and ecologically beneficial alternatives to burning; examples are cited in the STAP-Report.

Conclusions and Recommendations

- Switzerland supports the project, but recommends that alternative processes to sugar cane burning are examined in the further development of the project, as counselled by STAP.

CLIMATE CHANGE

3. Global: Umbrella Programme for Biennial Update Report to the United National Framework Convention on Climate Change (UNFCCC) - UNEP - GEF ID = 6925

✓ *Germany's Comments*

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

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

- Germany supports the proposal which aims at supporting Small Island Developing States (SIDS) and Least Developed Countries (LDCs) in the preparation of their Biannual Update Reports (BURs).
 - The PIF would benefit from emphasizing the benefits of strengthening national reporting systems in general and through BURs in particular. In this context it is commendable to point out that the project also contributes to the preparation of National Communications and more broadly to transparency efforts in the international climate regime.
 - As SIDS and LDCs will undergo the process of International Consultation and Analysis (ICA) after submission of their BUR (UNFCCC decision 2/CP.17, para. 58), although with some discretion, the planned activities i.e. capacity building workshops, introduced tools and shared documents should also address the ICA process for SIDS and LDCs.
 - To be in line with the BUR guidelines, the project proposal would benefit from demonstrating that the first BUR submitted shall cover, at a minimum, the inventory for the calendar year no more than 4 years prior the date of the submission. Germany kindly asks to outline measures to overcome the risk of GHG Inventories with older base years (especially Equatorial Guinea and Somalia which have not submitted any National Communication to date) and to outline how data gaps will be identified and closed with support of this project.
 - Regarding the coordination with other initiatives, Germany kindly asks to closely coordinate with the UNDP Low Emission Capacity Building (UNDP LECB) Programme, which operates in several countries and also conducts a series of capacity building workshops.

4. China: Upgrading of China SHP Capacity Project - UNIDO - GEF ID = 6919

✓ Germany's Comments

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

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

- The project proposal aims at an environmental upgrading of small hydropower plants in China. Germany appreciates that the project responds to the continuing need for greening hydropower in China and recognizes the large potential for increasing the sustainability of small hydropower plants in China. In this context, Germany particularly welcomes the reference to the Hydropower Sustainable Assessment Protocol. However, Germany requests clarification on the following issues:
 - Using the Chinese definition, the project addresses small hydropower plants (less than 50 MW). However, according to the International Commission on Large Dams (ICOLD) large hydropower plants start from 20MW, and the European Commission defines small hydropower plants as having a capacity up to 10 MW. The definition has implications on the use of standards, the involvement of stakeholders and the knowledge management. If the project includes large hydropower plants according to the ICOLD definition, it would be necessary to take into account the standards for large hydropower plants as well as to involve a broader range of stakeholders.
 - Germany kindly requests some further specification on the affordability of energy for the end user. It is of particular importance that the investments necessary to achieve a sustainable energy/ electricity supply do not result in increased energy/electricity prices in rural areas. This issue should be carefully taken into account when considering incentives such as subsidy schemes for green hydropower (investment grants for retrofitting activities, higher electricity tariffs, quota systems), preferential access to the grid, or certification schemes.
 - Germany kindly requests some further clarification on the need and the reasons for the demonstration/pilot projects, including their role in the implementing process.
 - Furthermore, the question of ownership is not addressed in the proposal; therefore further clarification about who operates the plants and which incentives will be provided to them to implement the measures is needed.
 - As the project aims at increasing sustainability of both energy and water availability, Germany suggests involving the Ministry of Energy and the Ministry of the Environment in the project activities.
 - The proposal mentions the water-energy nexus. However, it does not provide any information on the impact on fish passages, and whether these will be taken into account.
 - The proposal would also benefit from a more extensive account of the co-benefits of upgrading hydropower plants.

- It would be beneficial to clarify whether the 12th FYP has set a target for the use of hydropower, its share in non-fossil fuel consumption and its share in non-fossil fuel installed capacity.
- The proponent should clearly describe in how far the project targets the increase of competitiveness of hydropower technologies in China or if development of the same technology is foreseen to be promoted by the GEF funds.
- In order to ensure the environmental integrity of this project, it is vital that an environmental impact assessment is conducted and that it not only incorporates new developments but also the refurbishment of already existing hydropower plants, including small hydropower. Moreover, a full climate proofing regarding adaptation and mitigation should take place.

5. Ukraine: Finance and Technology Transfer Centre for Climate Change (FINTECC) - EBRD - GEF ID = 6942

✓ **Canada's Comments**

- It is not clear how this project relates to regional climate change technology transfer projects, or with the UNFCCC CTCN. As per recent past UNFCCC and GEF Council decisions, we request that efforts be made to ensure coordination amongst these climate change technology transfer initiatives.

✓ **Germany's Comments**

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

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

- Germany welcomes the systematic approach the proposed project takes by combining policy measures with technical assistance and investments to increase climate technology investments and contribute to improving energy self-sufficiency in Ukraine. While it is vital to increase energy security in Ukraine and to achieve an energy efficient economy, Germany would like to have some further clarification on the following:
 - Considering the country's fragile economy, Germany recognizes the current political difficulties in Ukraine and would appreciate further clarification on which steps Ukraine intends to take to ensure sufficient institutional provision for the formulation and sustained implementation of energy efficiency policies, particularly regarding the phase-out of barriers to competition such as domestic subsidies. This includes evidence to its commitment to cost-reflective energy pricing and transparency throughout the process visible in effective regulation of competition in the energy market. The institutional framework, i.e. the implementation and enforcement of policies, measures and laws to promote the adoption of renewable energy and energy efficiency will be crucial to the success and sustainability of the project.

- Germany kindly asks to further specify the calculation and the underlying assumptions (incl. the technologies to be supported) of the GHG reducing potential of 62.5 ktCO₂e/yr.
- The project aims at providing technical assistance and financial support/incentives to strengthen enabling environments for investments in climate-friendly technologies, with companies as the main beneficiary. Targeting companies to enhance energy security in Ukraine is a reasonable approach given the increasing energy prices in the country and the political pressure on companies to reduce their gas consumption (this winter by 30%). However, depending on the selected financial instruments, Germany seeks clarification on the conditions for granting credits. Due to very high interest rates, conditions may be deterrent if the transaction is processed by the major banks at the current rates. Usually these banks only give out small loans with very short pay back periods. Whether or not these financial incentives will be successful in the current market conditions depends on the size and issue date of the grant. If the grant is of considerable size, (compared to the credit) and it is swiftly paid out in order for companies' to limit their advance payments, the project will be a success as the pressure to lower energy consumption in Ukraine has of late substantially increased.
- Regarding the cooperation with other initiatives, Germany welcomes the strong liaison with the EBRD's regional FINTECC Framework and project. Germany further suggests to closely coordinate and exchange with other technology transfer centers (e.g. Kenya) and the Climate Technology Center Network (CTCN), as well as with other bilateral energy programs in the Ukraine, e.g. USAID's Municipal Energy Reform and Local Alternative Energy Solutions in Myrhorod, energy efficient building project of GIZ and the bilateral energy cooperation between Ukraine and Norway.

✓ *USA's Comments*

- The United States appreciates the EBRD's efforts to help the Ukraine improve its capacity for energy self-sufficiency in the Finance and Technology Transfer Center for Climate Change (FINTEC) project in Ukraine. We commend the effort taken in this project to involve collaboration with the public sector and look forward to a detailed description of how the project will collaborate with the UNFCCC/UNEP Climate Technology Center and Network (CTCN) in the full project proposal.
- Additionally, the United States also supports the Government of Ukraine in adopting a neutral approach to standards, technology, and procurement processes that allow all companies to compete equally for subsequent contracting opportunities. The United States urges that every stage of this project include procedures to ensure fair and open competition in subsequent procurements.

INTERNATIONAL WATERS

6. Regional (Azerbaijan, Georgia): Advancing IWRM across the Kura River Basin through Implementation of the Transboundary Agreed Actions and National Plans - UNDP - GEF ID = 6962

✓ Germany's Comments

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

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

- The proposed project is building upon a previous UNDP project funded by the GEF. Germany believes that further supporting the project would benefit the region and offers the following comments for consideration:
 - The link between the findings from the Transboundary Diagnostic Analysis (TDA) (and the trends analysis) in the foundational phase and the activities planned for this phase regarding the response to identified challenges (especially uncoordinated water use) is not entirely clear from the PIF;
 - The PIF also refers to the Alazani – Gahnikh nexus assessment done by the UNECE Water Convention and highlights its importance for the entire basin. It would be helpful to make clear how these findings from the assessment could contribute to and can be used for the project, in particular to provide more detail on where, how etc.
 - In the list of baseline projects, it would also be helpful to differentiate more clearly between projects supported by bi- and multilateral donors and broader legal and institutional cooperation frameworks (e.g. UNECE Protocol on Water and Health). It would then be clearer how the proposed project contributes, in particular, to the latter. Moreover, it is also recommended to clearly outline how donor coordination and cooperation between different projects could work. Close collaboration between these projects should be ensured.

✓ Switzerland's Comments

Overall Commentaries

- The objective of the proposed regional project is to establish cross-sectoral Integrated Water Resources Management (IWRM) governance protocols at the local, national and transboundary levels in the Kura River Basin. These sectors include the environment (ecosystems), agriculture, energy (hydropower) and industrial sectors, framed as the water-energy-food-ecosystem security nexus in the PIF. The shared objectives are on safeguarding water availability and quality, enhancing water productivity, and ensuring delivery of water and ecosystem services in the long term.
- The project corresponds well with the GEF-6 International Waters Focal Area Objective 2 “Catalyse investments to balance competing water-uses in the management of transboundary management of surface and groundwater and to enhance multi-state cooperation”. In this geopolitically challenging region currently only Georgia and

Azerbaijan participate in the project (together 88% of the basin area), while Armenia has indicated it will not join the Kura River Strategic Action Plan.

- The STAP has issued consent without any specific comments on the project proposal. We agree with this judgement, having however the following four questions which concern both project design and project boundary conditions.

Questions, Concerns and Challenges for further Project / Programme Refinement

- Addressing root causes: as stated in the Work Program (GEF/C.47/11), GEF 2020 and the GEF-6 Programming Directions document call for a “renewed focus on projects and programs that explore, whenever possible, the drivers of environmental degradation”. The PIF analyses the root causes as lack of effective planning, dedicated resources and capacities which in return stem from lack of economic value given to resources and lack of information on costs of environmental degradation.

>> We feel that the project could profit if the sustainability of the project and the way to address root causes through the project would be explained in more detail.

- Project budget and balance of GEF-financed components: it is our impression that the ratio of Components 4 and 5 are relatively high compared to Components 1 and 2, considering that the root causes identified above require capacity building within public institutions. Further, it is difficult to identify the ratio of the investments in capacity building compared to the overall project budget.

>> The project proposal could benefit of a more detailed explanation of the support for capacity building provided by the co-financing agencies (esp. the World Bank).

- Role of bilateral agreement: the PIF mentions close linkages between the national SAP and the bilateral agreement between Georgia and Azerbaijan (“Cooperation in the Field of Protection and Sustainable Use of the Water Resources of the Kura River Basin”) currently under negotiation.

>> An indication of the dependency of the project on the bilateral agreement could be helpful for the risk management of the project.

- Role/ integration of transboundary SAP in project: the transboundary SAP was formally endorsed by Azerbaijan and Georgia in June 2014. The statement that “through SAP implementation basin-wide efforts in water resource management will be harmonized where and when possible and appropriate” (PIF, p. 7) is vague.

>> A further indication of the linkage between the transboundary SAP and the project steering and management could be helpful for the design of the project management in the further development of the project proposal.

Conclusions and Recommendations

- Switzerland recommends the approval of the current proposal by taking into account STAP’s judgement and the GEF Secretariat’s notes on PIF improvements.
- Switzerland would appreciate it, if the suggestions raised above would be taken into account for final project preparation. Switzerland also agrees with the GEF Secretariat’s comment that at time of CEO Endorsement, data exchange protocols between the participating nations

shall be better supported with formal agreements.

✓ **USA's Comments**

- The United States is supportive of this proposal. Since 1991, the GEF International Water's portfolio has been key in achieving progress in critical river basins around the world; building shared paths to prosperity through collaborative sustainable development of water resources. The United States endorses continued efforts under GEF-6 to improve global water governance and advance transboundary water cooperation. In an age of heightened water stress, increased variability, and growing demands, these programs represent an important vehicle for economic growth and international cooperation.
- Strong, comprehensive engagement is essential to bring countries together over shared waters. These are often complex processes that require a high degree of trust, political will, and well-coordinated diplomatic and development support. Often, we have seen well-planned programs threatened by external risks beyond the control of program managers and staff. This unfortunate circumstance can undercut years of investment and limit basin-wide benefits. Through the UNDP Shared Waters Partnership, we would welcome opportunities to jointly identify areas where strategic collaboration with GEF-IW can address such risks and improve the chances for successful program outcomes.

7. Regional (Benin, Burkina Faso, Cote d'Ivoire, Ghana, Mali and Togo): Volta River Basin Strategic Action Programme Implementation Project - World Bank - GEF ID = 6964

✓ **France's Comments**

- We globally support this proposal but would like to underline two concerns, derived from our experience from our on-going projects with ABV:
 - First, the Volta Basin Authority has limited human resources and will need to be substantially reinforced in order to be able to implement this ambitious program;
 - Second, both issues of i) a water charter for Volta River Basin and ii) facilitation of dialogue and cooperation through a Basin management and regulation committee are critical for the region, but, decision support system to evaluate impacts of future large projects to be implemented in the basin (impact of dam construction for example) is not available and the development of such tool is not contemplated in this project proposal. We strongly recommend that this type of tool be developed in the framework of this project in parallel of the other project components in order to ensure fruitful dialogue and cooperation.

Opinion: Favourable provided the two suggestions above are integrated in the final project document

✓ **Germany's Comments**

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

Germany requests that the following requirements are taken into account during the design of

the final project proposal:

- Germany is highly positive on the proposed project as the Volta Basin Authority (VBA) has struggled with achieving a greater degree of institutionalization and attracting funding. Below are some suggestions for improvement:
 - It is recommended to further clarify how such institutional strengthening process is expected to be implemented and how it could lead to the outputs mentioned (Water Charter, Internal Procedures for VBA, etc.). For example, there is little to no reference to such institutional strengthening in the specification of the components (especially with regards to the institution as a whole and not only specific processes or sub-bodies such as the mentioned Basin Management and Regulation Committee).
 - Moreover, it would be helpful to add clarification on the actual approaches for such legal and institutional development, particularly regarding the timing and the mutual reinforcement of the different components. For example, the aim of component 1 is to support the development of a Water Charter for the basin. However, this would require the VBA to be a sufficiently strong institution (in terms of mandate, human and technical capacity) to manage and coordinate the process of drafting such Charter and then having it ratified by member countries. Therefore, it would be recommended that more information is provided on whether the institutional strengthening of the VBA is expected to happen parallel to the drafting of the Water Charter or whether it is a prerequisite to it. Also it would be helpful to provide more information on and how this is expected to be implemented.
 - An additional recommendation would be to provide further specification on how the two mentioned existing projects in the region as well as other bilateral activities of various donors in the region) can be used as well as how the proposed project can build on existing work and coordinate with existing projects.

8. Mexico: Implementation of the Strategic Action Program of the Gulf of Mexico Large Marine Ecosystem - UNIDO - GEF ID = 6952

✓ *Germany's Comments*

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

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

- Germany welcomes the PIF and appreciates the aim of promoting a healthy marine ecosystem. The project design is holistic, covering aspects related to water pollution reduction, protection and recovery of marine resources as well as conservation of the local environment. All described instruments have proven to work in projects worldwide. The transboundary approach as well as the envisaged implementation of the FAO's guidelines for Securing Sustainable Small-Scale Fisheries are seen as essential for the project's success.

MULTI FOCAL AREA

9. Global: GEF Small Grants Programme - Sixth Operational Phase (Part I) - UNDP - GEF ID = 6931

✓ France's Comments

- We globally support this proposal. The Project is well designed and documented. The project rationale is robust.
- Our comments are notably driven by the similar experience of the FFEM “Programme de Petites Initiatives” which provides also small grants (up to 50.000 Euros) to NGO, CBOs and small private enterprises. They mainly refer to component I of the programme (community landscape and Seascape Conservation), a fourth phase (PPI-4) of which has been launched for the period 2013-2016.
 - We would like to have more information on the planned capacity building activities especially in terms of implementation (content of the capacity building activities, performed by whom) and monitoring (base line, indicators).
 - We welcome the synergy effort to coordinate with other partnership and programmes such as FFEM's PPI,
 - We stress the relevance to refer to “the Promise of Sydney” (WPC, November 2014)¹,
 - We find quite relevant, and challenging, the extension of the landscape approach to seascape.

Opinion: favorable provided that our request of additional information on capacity building activities is taken into account.

✓ Germany's Comments

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

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

- Germany welcomes the proposed project as it supports community based projects and a strong involvement of civil society in safeguarding the global environment.
 - Germany appreciates the improvements made in monitoring and evaluation, particularly the introduction of an annual global monitoring report. However, considering the highly complicated nature of a global project, particularly one working on a local level with smaller NGOs, it is recommended that solid and streamlined monitoring and evaluation

¹ “SGP will complement existing and planned GEF investments, particularly in support of transboundary conservation efforts in the international waters focal area, in partnership with other programmes such as the Critical Ecosystem Partnership Fund (CEPF), French GEF (FFEM), as well as grass-roots networks including the expanding global network of Locally Managed Marine Areas (LMMAs). As such, the identification process will make use of the “GEF criteria for Defining Globally Significant Sites for Biodiversity Conservation” in Annex 3 of the GEF-6 Programming Directions. In addition, SGP will reinforce and strengthen GEF support towards the planned 10-year work programme for protected areas to be established at the next World Parks Congress in November 2014 (“The Promise of Sydney”).”

procedures are further developed and improved. It is also recommended to ensure that coordination between different agencies runs smoothly, and that the SGP project is not perceived as a stand-alone project. Furthermore, it would be helpful to get an understanding of how the SGP project is integrated into the domestic institutional structure.

- A clearer vision on how the project will contribute to positive outcomes for biodiversity is desirable. Intended positive impacts on forest biodiversity are mentioned, however, positive impacts on agro-biodiversity and biodiversity in non-forest areas are not outlined in the PIF. We would like the final project document to elaborate more clearly on what protection of and gains in biodiversity are expected from this project component.
- Moreover, in order to further strengthen the proposed project, Germany recommends that the Small Grant Programme (SGP) ensures that the experiences of the projects would be used to increase the outreach of Best Available Techniques (BAT)/Best Environmental Practices (BEP). It would be helpful if the experiences on the communal level were prepared in a way that make the information and experiences easily accessible. This would increase the outreach and would be helpful for countries that have to tackle similar challenges.

10. Regional (*Indonesia, Timor Leste*): Implementation of the Arafura and Timor Seas Regional and National Strategic Action Programs - UNDP - GEF ID = 6920

✓ *Germany's Comments*

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

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

- Germany welcomes the promotion of the Ecosystem approach to fisheries management (EAFM) implemented at the Large Marine Ecosystem level for shared stocks in the Arafura and Timor Seas region. All described instruments have proven to work in projects worldwide. Moving more fisheries in the region towards certification/eco-labelling and to improve surveillance, enforcement and monitoring for the reduction of IUU fishing is seen as vital for the project's success.
- Since the FAO Code of Conduct for Responsible Fisheries (CCRF) defines good fisheries management, all activities planned should derive from this internationally recognized framework. The FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries (SSF) are recognizing the special importance and peculiarities of small scale fisheries in terms of food and income security. Therefore Germany recommends that stronger references to the CCRF/SSF are incorporated in component 2.1 "Improved management of fisheries", thereby supporting the implementation of the CCRF as well as the SSF.

✓ *USA's Comments*

The United States is supportive of this proposal. Although it demonstrates member country engagement, support, and commitment for taking the next steps to build off of the clearly

successful Transboundary Diagnostic Analysis (TDA) and Strategic Action Program (SAP) development in the first phase of the effort, the United States requests that the final project proposal be revised to allow the UNDP to respond to STAP input and our technical comments prior to the GEF CEO endorsement.

- The United States has several suggestions listed below that UNDP may consider to better align the project with the many ongoing regional efforts.
 - The proposal suggests the UNDP intends to seek “close collaboration” with the Indonesian Seas Large Marine Ecosystem (ISLME). In the full project proposal, it will be important to define how this latter engagement with a sister LME project will occur (of note ISLME’s PIF begins to lay this out nicely). The United States encourages the two GEF agencies implementing the projects (UNDP for ATS and FAO for ISLME) to define clear and regular lines of communication and a strategic partnership to prevent a duplication of effort. Additionally, the ATS project will likely have experience and knowledge that could be shared with ISLME in the development of their TDA and SAP. IW:Learn or the LME Global Partnership could potentially facilitate such interactions.
 - The PIF clearly articulates the intent and interest in building out capacity and to do trainings in ecosystem approach to fisheries management (EAFM), there is no direct reference to leveraging existing capacity developed other projects, including those in the Bay of Bengal Large Marine Ecosystem (BoBLME) and the Coral Triangle Initiative (CTI) region. If not already in the planning, the United States recommends that the ATS project consider working with relevant partners to adopt this capacity already being used successfully in the BOBLME and CTI regions, as proposed in the ISLME project.
 - The United States recommend the UNDP and relevant project partners consider co-locating the ATS project coordination units with those of other regional projects including but not limited to the ISLME and the CTI. This could help to facilitate cost and information sharing efficiencies that could greatly enhance the project impact. As noted in the ATS PIF, Indonesia will be hosting the new regional mechanism for ATSEF (the Arafura and Timor Seas Experts Forum, a UN type-2 non-binding forum) at a new facility that they are building in Bali. Relatedly, it may be worthwhile for UNDP to consider if it may be beneficial for the ATS project to have a relationship to the CTI governance mechanism, the CTI National Coordinating Committee (NCC). Elements of this entity and potentially others could be utilized for ATSEA to prevent another project management body from being formed.
 - The UNDP may wish to consider utilizing and building upon existing regional tools to operationalize the ATS project. Such tools may include: (1) CTI’s management and evaluation system, which aligns with the ATSEA indicators and goals; (2) EAFM curriculum for managers and leaders that has been developed collaboratively by FAO, CTI, and SEAFDEC; and (3) policy papers on EAFM, MPA, EBM, IUU, vessel registration, port state measures, and MC that may provide helpful context.
 - The United States has numerous technical questions we expect will be clarified in the full project proposal:
 - What shark species will be considered and what are the RFMO collaboration/obligations that will be required to manage these species?

- For sea turtle-related work, will the project staff work with the existing stakeholders at the University of Papua at Manokwari (UNIPA)?
- On which species of bycatch will this project focus? What is the long-term sustainability of MSC certification? MSC certification requires regular audits for which the fishery has to pay. Who will pay for those audits and re-certifications in post GEF funding and how will the UNDP work with project stakeholders to ensure long-term sustainability?

11. Regional (*Marshall Islands, Solomon Islands, Tuvalu*): Pacific Islands Regional Oceanscape Program (PROP) - World Bank - GEF ID = 6970

✓ **France's Comments**

- This project is ambitious, but built on solid assessments and realistic approaches.
- We globally support this proposal and would like to suggest an articulation of the proposed GEF project with a new FFEM/AFD project, titled RESCCUE, which is just at the beginning of the implementation phase.
- The RESCCUE project aims at supporting Pacific islands in implementing integrated coastal zone management (ICZM), resorting especially to economic valuations and innovative financial instruments.
- In particular, component 3 “Economic and financial instrument” of the FFEM/AFD project, aims at setting up economic and financial instruments to generate additional and sustainable funding for ICZM (payment for ecosystem services, taxes, usage fees, trust funds, quotas market, mitigation, labelling, etc.). It could be linked with the proposed GEF component 3 “Sustainable Financing of the Conservation of Critical Fishery Habitats” that aims to help identify revenue streams to sustainably finance the conservation of critical habitats that underpin oceanic and coastal fisheries in the region.
- The FFEM/AFD project is implemented by SPC (Secretariat of the Pacific Community) which also implements INTEGRE project (Pacific Territories Initiative for Regional Management of the Environment). The INTEGRE project involves four European Pacific overseas countries and territories (OCTs), is funded by the European Union under the 10th Pacific-Regional European Development Fund and aims at promoting integrated coastal zone management and strengthening regional co-operation in the area of sustainable development.
- Coordination with those two projects could be useful.
- For these reasons, we suggest to extend the GEF secretariat recommendation “Provide detailed information of how the project will build on past and on-going GEF initiatives, and/or coordinate with them” to both RESCCUE and INTEGRE initiatives.

Opinion: Favourable

✓ **Germany's Comments**

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

comments are taken into account:

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

- Germany welcomes the promotion of ecosystem-based coastal management and the harmonization of regional management approaches in the Pacific Islands region. All described instruments have proven to work in projects worldwide. However, Germany would like to point out that the proposed Coastal Ecosystems Management activities in Tuvalu to restore the Funafuti lagoon has already had an assigned GEF (5550) funded UNDP project titled "Implementing a Ridge to Reef Approach to Protect Biodiversity and Ecosystem Functions". In order to avoid double funding and gain synergies, the full proposal should clearly outline how the World Bank aims at incorporating and building upon the UNDP project. Regional coordination among participating countries as well as donor agencies is vital to ensure a coherent approach to program implementation as well as wide dissemination of results and lessons learned. Furthermore, the proposal should elaborate on how sites for Marine Protected Areas will be identified.

12. Azerbaijan: Conservation and Sustainable Use of Globally Important Agro-biodiversity - UNDP - GEF ID = 6943

✓ **Germany's Comments**

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

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

- Germany welcomes the proposed project and its integrated approach for the conservation of agro-biodiversity in Azerbaijan. However, a more detailed description would be helpful in order to ensure smooth coordination between the involved public, private and civil society stakeholders by
 - Describing envisaged long-term innovations regarding the cooperation and coordination of relevant stakeholders for ensuring the sustainable use of agro-biodiversity in the country (A.1.3)
 - Describing envisaged coordination and decision making procedures among the involved stakeholders during program implementation (A.5)
 - Linking the programs activities to the Second National Biodiversity Strategy and Action Plan that is currently under preparation and aims to align government activities with regard to biodiversity protection (A.5)
- Germany additionally recommends to
 - Define in more detail which cultivation practices are considered under the term “intensified soil protecting technologies” and to strengthen the aspect of developing diverse and sustainable farming systems also with regard to climate change adaptation (A.1.3)
 - Foresee the provision of seed sorting, cleaning and disinfection equipment to the farmer association to ensure a high quality of seeds (A.1.3).
 - Define in more detail the establishment of economic incentives for the sustainable use of agro-biodiversity (regional brands, eco-labels, improvement of value chains for agro-biodiversity products in coordination with the national certification bodies and the Ministry of Economy) (A.1.3).
 - Take into account pilot activities in the field of agro-biodiversity in Azerbaijan conducted by the GIZ program “Sustainable Management of Biodiversity, South Caucasus” in cooperation with local NGOs (AIM, GABA, Ecosfera) and include GIZ in Coordination (A.5)

✓ **USA's Comments**

- The United States requests that the UNDP modify this proposal to reflect the technical comments submitted by the STAP prior to GEF CEO Endorsement.

✓ Switzerland's Comments

Overall Commentaries

- Azerbaijan, with a significant part of the population relying on and employed in agriculture, is rich in local genetic resources and has a high potential for agro-biodiversity. Together with high-level political attention to developing agriculture in a sustainable manner, it deserves the support of GEF. The concept of the project is good and very ambitious. We think it could further benefit from a solid baseline assessment and additional bottom-up approach elements. There are suggestions for refinement, in particular strengthening the baseline, including a macro-analysis of global market trends and barriers to the use of indigenous species in agriculture. Toning down the very optimistic targets could strengthen the project by making progress more realistic and measurable. The overall approach needs to be rooted in farmers' interest to participate and implement. We believe the project could benefit if this understanding would be more clearly shown in the project proposal; certain propositions, such as establishing subsidies or implementing sustainable land management could further profit from more detailed explanations or some revisions in the project design.

Questions, Concerns and Challenges for further Project / Programme Refinement

- *Strengthen the baseline:* if local varieties are good and reliable, it is important to assess in greater detail why and also explain why they remain largely under-used or neglected (market forces, others?). More evidence from Azerbaijan or elsewhere would considerably strengthen the good project logic with facts.
- *Adjust / sharpen the project targets:* The 70% target for local varieties by 2025 is very ambitious, it might improve the project if long-term and all intermediary targets were slightly readjusted to more achievable and also measurable/verifiable goals.
- *Land Degradation component* would benefit from a stronger argumentation of technical and practical approaches (such as using WOCAT or other tools and experiences) for the adoption and spreading of farming based on local varieties by methods that improve/sustain land health.
- *Subsidies* proposed in the project may eventually work as envisaged, they are however associated with the risk of limited project sustainability when they dry out. The project could benefit from a further consideration of risk mitigation options or alternatives to subsidies (promotional schemes, etc.).
- *Farmers' participation:* considering Azerbaijan's economy in transition, it could be helpful for the project to further explain where and how top-down and bottom-up approaches could effectively be used (in combination) in the project implementation and potential up-scaling of results.
- *A reserve status for 'hotspots':* the project may need to show if the relevant legal and institutional base or experience is already in place in Azerbaijan for establishment of the mentioned "micro-reserves", or if these need to be specifically created. More detail on how agro-biodiversity hotspots will be defined and what they will conserve will be useful.
- *Climatic (weather) risk is considered high:* it would add to the project quality if synergies with ongoing climate change projects were established and assessments in the country /

region would be conducted so that the local varieties targeted by the project would be both economically viable and climate resilient.

Conclusions and Recommendations

- The project proposal is logical and consistent with GEF focal areas, country biodiversity and agricultural priorities. Linkages with several ongoing projects to enable synergies are made.
- Switzerland recommends the approval of the current proposal, however recommends that the issues raised in the STAP screening paper and the current assessment (above) are taken into account for final project preparation.

13. Belarus: Forestry Development Project - World Bank - GEF ID = 6947

✓ *Canada's Comments*

- Canada supports sustainable forest management that maintains and enhances the long-term health of forest ecosystems for the benefit of all living things while providing environmental, economic, social, and cultural opportunities for present and future generations. Canada encourages Belarus to take into consideration the broader principles of sustainable forest management in their management planning processes.

✓ *Germany's Comments*

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

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

- Germany welcomes the proposed project and its approach of integrating multiple stakeholders in the process of developing sustainable forest management standards and offers the following suggestions:
- It is recommendable that the PIF more clearly identifies how stakeholders are involved in this process by:
 - Describing the platforms and coordination processes in which stakeholders are brought together for discussing sustainable forest management standards
 - Identifying how individual stakeholder groups (private enterprises, civil society, vulnerable groups) are represented in these processes (e.g. through existing umbrella associations) an improved carbon balance through intensified forest management and utilization of residues depends on (among other things) the further processing of those products. The PIF should therefore identify this potential by describing how residues are transported and processed after harvesting. This could be done, for example by bioenergy plants.
- Germany additionally recommends to:
 - Specify how to address the risk of significant nutrition loss through intensified forest operations and utilization of residues

- Provide background information on forest fire causes as well as baseline estimates on the impact of forest fires and the potential to reduce these.

14. Lao PDR: Sustainable Forest and Land Management in the Dry Dipterocarp Forest Ecosystems of Southern Lao PDR - UNDP - GEF ID = 6940

✓ Germany's Comments

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

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

- Germany welcomes the proposed project but would like to point out that the five-year-socio economic development planning process is currently finalized for the entire country. Therefore, it would be recommended to consider the time periods for five-year socio economic development planning (SEDP) in the project planning for integrating ILUMPs in SEDP of districts (B.1.a). Moreover, the Savannakhet Province is currently undergoing major infrastructure planning processes, including a road connecting Thailand with Vietnam. This might have direct and indirect consequences on deforestation and degradation. It is therefore recommended that the PIF considers relevant development factors of the province when establishing realistic estimates on reduced degradation in forest landscapes (B.1.a) as well as greenhouse gas mitigation potentials over a 10 year period (F.4).
- Germany additionally suggests to:
 - Verify the numbers provided in the PIF document on land areas (forest area 52% of total provincial area is conflicting with 68% agricultural land of total provincial area) and clarify whether these relate to land use or land cover (Part II. A.1)
 - Specify definitions of forest area and consider village forest areas that are not covered under the three forest types production, protection and conservation forests

✓ USA's Comments

The United States supports the efforts of Lao PDR to use an integrated approach to addressing forest landscape management and biodiversity conservation. Prior to GEF CEO Endorsement of this proposal, we request that the UNDP address our technical comments.

- The institutions in Lao PDR may not have the capacity to quickly absorb some of the project recommendations and assistance as proposed. In the full project proposal, we request that the risks associated with capacity development be included in the risk matrix and discuss mitigation measures that may be employed to address the related challenges to project objectives.
- To provide an indication of project success, we request that the UNDP conduct a baseline survey on biodiversity and ecosystem services to establish information to determine whether the desired project impacts will be achieved.

- The United States welcomes the inclusion of additional details regarding the relevance of the Asian Development Bank *Greater Mekong Subregion* investment for improved agriculture infrastructure to this project in the full project documentation.

15. Tajikistan: Conservation and Sustainable Use of Pamir Alay and Tian Shan Ecosystems for Snow Leopard Protection and Sustainable Community Livelihoods - UNDP - GEF ID = 6949

✓ *Canada's Comments*

- Canada strongly agrees with the STAP that the final project proposal should place increased focus on developing protected areas as devolved cost centers that use performance based management to plan, track and report on project performance.

✓ *Germany's Comments*

Germany approves the PIF and requests for the following project 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:

- Thank you very much for the additional explanations based on which Germany approves the PIF and requests that the following requirements are taken into account during the design of the final project proposal:
- The proposed project aims at demonstrating viability of landscape approach to conservation of internationally important biodiversity, in particular the endangered snow leopard, land and forest resources in Tian Shan and Pamir Alay Mountain Ecosystems in harmony with sustainable development of local communities.
- Given the fact that the official area of the Protected Areas (PAs) covers 23% of the territory of the Republic of Tajikistan, we suggest that priority should be given to enforcement of management measures and demonstration and dissemination of good practices with involvement of local population within and the vicinity of existing Protected Areas, rather than the extension of the current PA network and the development/revision of Management plans. As a matter of fact, effective biodiversity preservation through PAs needs to go hand in hand with addressing the social and economic needs of the local population. Germany generally approves the idea to bring existing management plans in conformity with ecological requirements for Snow Leopards. However, in order to achieve improvements for Snow Leopard protection on the ground and to gain experiences of how to effectively ensure the enforcement of protection measures in the PA system, it is critical to focus on concrete implementation of planned protection measures in the framework of existing management plans in the already established PAs. Based on gained implementation experiences, with a strong involvement of the local population, a second step could be taken to conduct further measures on enlargement of the "Ecological Network", not necessarily as governmental PAs, but including the establishment of sustainably managed conservancies.
- Further the allocation of SFM programming funds needs further justification in regard to Snow Leopard conservation. Despite the undoubtable need and importance to protect "forests

important for biodiversity”, its role as important buffer zones and migration corridors for Snow Leopards is not clear. Scientific literature indicates that Snow Leopards usually avoid forested areas, as do most of its main prey species. The PIF does not explain how the restoration of a total area of 6000 ha of forested areas shall be realized and how its sustainability can be ensured.

- Additionally, we would like to share the following observations based on our experience in biodiversity conservation and sustainable development, and kindly ask UNDP to take them into account:
 - Concerning the “bio-technical” measures, international experience raises concerns that migration bridges and feeding of prey of Snow Leopards are neither suitable nor sustainable measures for wildlife conservation. Instead, internationally acknowledged approaches such as Sustainable wildlife management for trophy hunting of important prey species should be considered. In the more distant communities, beekeeping, production of construction material, and collection of fruits and medicinal herbs has proven to be of limited impact on combating illegal hunting activities.
 - The statement that the project will further stimulate livestock mobility (micro-bridges and equipped mountain trails in farther areas that are suitable for grazing) might unintendedly lead to the effect that last unused areas are included into the livestock grazing, thus affecting last existing undisturbed habitats of snow leopard and its prey.
 - The Ak-Tash reserve in Sogd Province has been set up for conservation of marmot and has only very limited area suitable for snow leopard and its prey. Transferring the reserve to another category may not have any significant impact on Snow Leopard conservation.
 - Regarding cooperation with other actors, important projects on sustainable land management and ecosystem restoration, such as the World Bank’s Environmental Land Management and Rural Livelihoods Project (duration 2013-2018, 16 Mio USD) and the IFAD program on Livestock and pasture development (until 2017, 16 Mio USD) are not mentioned although they are partly active in the proposed areas (especially the districts Jirgatol and Tavilderra, Shurabod). Furthermore, no involvement of renowned wildlife experts from the Academy of Sciences, responsible for wildlife monitoring, seems to be foreseen in the project preparation.

✓ *Switzerland’s Comments*

Overall Comments

- We very much welcome a project linking community livelihoods and the conservation of biodiversity, notably the Snow Leopard (SL), in the framework of a multi-focal area project. There is an urgent need for better protection of biodiversity in Tajikistan and there are substantial opportunities for improving community livelihoods in an integrated approach. Tajikistan lies in core area of SL range and can thus play an important role in the Global Snow Leopard and Ecosystem Protection Program (GSLEP) – therefore, careful planning of the proposed project is crucial.
- The objective of the proposed project is improved conservation of biodiversity, notably the SL, through a landscape scale conservation approach, including the creation of buffer zones, sustainable forest and pasture management while assuring sustainable development of local

communities.

- Key expected outcomes of the project include the designation of new protected areas, strengthened capacities of foresters, protected area (PA) staff and communities, forest and pasture management plans for selected districts, the restoration of 30'000ha of pastures and 6'000ha of forests, the adoption of international standards for monitoring and research on SL as well as at least one cross-border SL conservation agreement.

Questions, Concerns and Challenges for further Project / Programme Refinement

- The project would benefit if it would be further defined, both geographically as well as in terms of content. The project area is very large and subdivided. Several of the areas mentioned in the text and where activities are planned are not key areas for SL and some are not known to hold SL to date. On the other hand, some of the most important areas for SL in Darvoz district and large parts of Murghab district are not covered.
- The project proposes the designation of new protected areas based on the argument that less than 50% of SL habitat is under protection. This attempt is very good and legal protection for 50% (or somewhat less) of SL habitat is very positive. However we would like to highlight the enforcement challenges linked to habitat protection in Tajikistan. The previous, GEF-funded development of a PA management plan has also shown that the main challenges are faced at the implementation stage. Therefore we recommend that in addition to new SL protected habitat zones the project should also focus on the strengthening of enforcement and accountability to the conservation targets to add to the sustainability of the project.
- We also highly recommend to consider the STAP comments 3 and 4 regarding the role of communities in the management of trophy hunting and benefit sharing in the further development of the project. There are successful examples of community-based conservation (and a case of a private local company) coupled with sustainable trophy hunting in Tajikistan. Some of the areas covered by programs of community-based conservation are the country's most important areas for SL and ungulates today. The proposed reduction of hunting quota could pose a risk to current successful community-managed trophy hunting. The official hunting quota for Marco Polo Sheep and Siberian Ibex are not too high given the numbers of these species in Tajikistan as a whole. We believe that the project could benefit if the role of the local communities would be shown in more detail and stronger local community management component would be integrated.
- Improved access to rarely used pastures is counter-productive to the conservation of SL and its prey species, as these pastures are relatively undisturbed and thus provide crucial refuge. We therefore recommend to further develop the pasture management component of the project to assure their crucial refuge character and strengthen the sustainability of the project.
- Reforestation benefits biodiversity, contributes to Sustainable Forest Management and helps to prevent Land Degradation. Therefore we welcome the reforestation component in this project. Nevertheless, we would like to highlight that reforestation with juniper is technically very demanding and therefore recommend that the design of the reforestation component should be further developed to ensure the multiple above mentioned benefits.
- The scale of the project (objectives and budget) has to be matched to the capacities of the partners including the government agencies involved in order to be sustainable. In this regard

we support comment 5 from the STAP and would welcome its consideration in further project preparation.

Conclusions and Recommendations

- A project linking the in-situ conservation of biodiversity to community livelihoods is of high importance. Better protection of SL and associated biodiversity in Tajikistan will provide global biodiversity benefits.
- However, there is some improvement potential in the current proposed project. We feel it would highly benefit if the comments above and the STAP comments would be taken into account and the project would be further detailed using the expertise in SL conservation available in Tajikistan and beyond. Further strengthening and rolling-out of community-based conservation, community-based, sustainable hunting and improved enforcement of regulations within and outside of existing PAs should be included and would add to the various environmental benefits of the project.
- Switzerland is looking forward to the revised project proposal prior to CEO endorsement.