



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 MAY 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 May 2011.

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BIOLOGICAL DIVERSITY

1. Iran - Building a Multiple-Use Forest Management Framework to Conserve Biodiversity in the Caspian Forest Landscape; UNDP, ID 4470.

✓ **French Comments**

The project is focused on biodiversity conservation in the Caspian Forest. This region located at the border of many different ecosystems: Mediterranean, Siberian and Indian. It is the place for a high level of endemism.

The project will support the strengthening of protected areas with a special attention on National Services involved in the sector and local population who will be helped by the project to reduce forest clearance for agriculture and manage forest areas.

Opinion: favourable

✓ **United States**

Opposed the project in light of its national legislation regarding its country's voting position for development projects financed by certain development institutions.

2. Nepal: Integrating traditional crop genetic biodiversity into technology: using a biodiversity portfolio approach to buffer against unpredictable environmental changes in the Nepal Himalayas; UNEP, ID 4464

✓ **French Comments**

The project targets the preservation of Traditional Crop Genetic Diversity in Nepal. It plans (i) to mainstream mechanisms that integrate diversity rich solutions into breeding and technology, (ii) Increase access to local agricultural biodiversity planting materials (seeds, clones) and (iii) promote an enabling environment for access and benefit sharing of local agricultural biodiversity planting materials.

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

The current PIF is unclear upon overall sustainability. Following issues should be addressed:

- a) the quantification of the baseline situation, but also if there is a sustainable and viable mechanism in Nepal to monitor regularly the evolution of agro biodiversity situation (pressure, degradation, species in danger, etc)
- b) the economics and comparative advantages for the local rural producers in the use of agriculture products using traditional crop diversity
- c) monitoring the financial sustainability of the different mechanisms it intends to establish: how much cost and who will pay for the community biodiversity registries, community seed banks, community based seed production of diversified materials, and the certifications of products like “geographically identifiable agriculture products”?

Opinion: favorable with recommendations (a), (b) and (c) above.

✓ **Swiss Comments**

General Commentaries

Protecting the gene pool of wild forms of key agricultural crop species is undoubtedly of paramount global importance, especially in view of the ever increasing global food shortages attributed to the world’s population explosion, a recognized root cause for climate change.

The key question is: will the proposed project be able to make a significant contribution to effectively protecting the seven targeted wild crop species in the high Himalayas and protecting local farmers against the increasingly dominating influence of powerful multi-national seed production monopolies? This is an enormous challenge!

Challenges, Questions and Concerns for further Project Preparation

- (1) It is very difficult for the proposed project to produce climate-change-adapted crop hybrids within a five-year trial when it took centuries of cross-breeding and plant selection to produce the currently used hybrids which appear well adapted to the high mountain climate and the rather sophisticated irrigation, terracing and cultivation techniques used by ethnic groups of the high Himalayas.
- (2) It remains unclear of how exactly the project will protect the wild relatives of the seven targeted crop species (i.e., in situ and/or ex-situ protection; habitat protection, creation of protected areas, etc.) in light of existing shortages of land suitable for agriculture.
- (3) It is unclear of how exactly the project will contribute to sustainable protection of agro-biodiversity beyond the current use and practices that have evolved over centuries in the target area.
- (4) A more precise explanation would be helpful on the proposed certification scheme of agricultural crops and practices; it is unclear what exactly should be certified and how this will benefit the poor subsistence farmers.
- (5) The proposal is too vague regarding the target area; it is not clear whether the proposed interventions encompass the entire country or specific pilot areas.
- (6) It is unclear how the proposal will promote “ecosystem services” which appear to be already well recognized within a land-use system that has evolved over centuries. It also is not clear how the promotion of “ecosystem” services will be linked to biodiversity conservation.

Conclusions and Recommendations

Switzerland recognizes the importance of this project, but it considers that the PIF leaves some questions open (see above).

It is suggested that this highly ambitious and broadly-based proposal would benefit from stream-lining and a focus on practical interventions within suitable pilot areas offering enabling framework conditions.

The proposal refers *inter alia* to the current Swiss-funded establishment of biodiversity-rich house-gardens in the Nepalese high Himalayas, a project that is practical and concrete, providing visible and measurable benefits to the rural poor and isolated subsistence farmers and contributing to agricultural biodiversity conservation, and that allows for easy monitoring and evaluation. For the further planning of the current GEF proposal, we therefore recommend an experience exchange with mentioned bilateral project.

Last but not least, this proposal appears to be more in line with GEF’s “Multi-focal Area” Program rather than “Biodiversity”.

✓ *Denmark Comments*

Generally very positive, but from our embassy in Nepal it has been mentioned that NARC seems to be marred with poor documentation and extension of its research due to weak organizational capacity. In this context, in order to achieve outcome of the project, some organizational reform activities integrated in the project has been recommend.

3. Sao Tome and Principe: Integrated Ecosystem Approach to Biodiversity Mainstreaming and Conservation in the Buffer Zones of the Obo National Park, IFAD: ID 4494

✓ **French Comments**

This project builds on an existing partnership between Sao Tome and IFAD on Agriculture and Artisanal Fisheries Development (PAPAFPA). It targets the buffer zone of Obo National Park which covers both terrestrial and marine areas with a view:

1. To mainstream biodiversity at the institutional level
2. To develop integrated ecosystem management for biodiversity in the buffer zone

The activities proposed are “classical” of activities in the buffer zone of a National Park.

The construction of the project using an existing Agriculture and Fisheries project is interesting and gives credibility to the considered engagement of economic actors of the buffer zone (farmer, plantation, fishermen).

Still, due to this development orientated foundation, the project shouldn't forget about the conservation context. In this regard, more information would be needed on the state of Obo National Park itself, its level of management and how the management of the buffer zone flows from the planning and management documents of the Park or not.

(a) The legal basis of the buffer zone and the institutional chain of responsibility on the buffer zone are not clear either. Flowing from this, the respective role of competent entities (Park, Ministry in charge of Agriculture, etc.) should be refined.

(b) The next step of the project preparation should argument also in more detail the scenarios considered, their economic and social sustainability: who's is going to win from the project, who's is going to lose and how the project address this?

Opinion: favourable with the above remarks (a) and (b) to be taken into account.

✓ Swiss Comments

Overall Commentaries

The project aims at mainstreaming the sustainable use of natural resources and biodiversity in the buffer zone of Obo National Park by improving coordinated and integrated ecosystem approaches at institutional and community level as well as through Public Private Partnerships. The project will specifically promote cropping and marketing of high-value organic coffee and cocoa under forest shade. The main issue that will be addressed is logging and forest clearing for cropping. The project aims at contributing to the conservation of about 7000 ha of shade forest, other key habitats, and to protect and conserve some endangered species such as: the Mulberry Tree (*Melícia excelsa*), the Quebra-machado (*Homalium henriquensii*), the Malagueta tuatúa (red pepper), the black and white Viros, and the Marapião.

The project is linked to the IFAD Participatory Smallholder Agriculture and Artisanal Fisheries Development Programme (PAPAFPA) which has been setting up farmers' organizations and working on productive landscapes and seems firmly anchored at the institutional and local level. This is an important basis to succeed in increasing revenues resulting from diversification activities to the communities living around the park, which will contribute to reducing the pressure on the natural resources both in and around the national park and in coastal areas.

Challenges, Questions and Concerns for further Project Preparation

Benefits to global biodiversity are so far not sufficiently addressed for a project running under the focal area biodiversity. Eco-compatible production or organic farming does not *per se* contribute to the conservation of biodiversity. Furthermore, the project's approach to the habitats and species to be conserved and protected is so far not sufficiently tangible.

Further project elaboration must therefore put emphasis on a strategic approach to biodiversity conservation, i.e. on the specification of the benefits for global and local biodiversity to be achieved and on the ways and means with which these will be achieved.

Conclusions and Recommendations

Switzerland welcomes this project which targets the buffer zones of the Obo National Park on both islands of Sao Tome and Principe, and requests that in further project preparation the approach to biodiversity conservation be specified and addressed in a strategic way.

✓ *Germany Comments*

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

- 1) Besides strengthening associations and NGOs within rural and coastal communities as key stakeholders of the project it would be recommendable to explain how the project will strategically attend the government sector, also on the national level. Mainstreaming of biodiversity in other sectors and the work on regulatory frameworks require ideas with which institutions (allies) the policy work will be done.
- 2) The risk assessment (under B4) could incorporate the aspects of climate change and what kind of synergetic elements with the UNDP/GEF programs might help in mitigating the risks.

WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(Reference GEF/C40.08)

4. Uganda: Conservation and Sustainable Use of the Threatened Savanna Woodland in the Kidepo Critical Landscape in North Eastern Uganda, UNDP; ID 4456

✓ **French Comments**

Promote the sharing/cross country experience between similar projects / programs (project in Uganda and Namibia, China).

The project targets the preservation of the Savana Woodland in North Earstern Uganda. It plans 1) to strengthen the management effectiveness of the Kipedo Protected Area cluster which contains 7 protected areas and 2) integrate the protected areas management in the wider landscape.

The project angle (cluster and approach landscape) appears relevant to tackle the issues at the levels of ecosystems in their entirety. It also brings a level of complexity in return through the mosaic of land use and protection status of the different areas of the cluster/landscape.

This implies though a strong governance of the project and the sincere involvement of relevant authorities (in charge of productive sectors (agriculture, fisheries..)) beyond UWA (Uganda Wildlife Authority) as well as civil society which can support the work at the community level in particular.

(a) This topic should be emphasized

Concerning the landscape approach, the PIF indicates that land tenure in the area is predominantly “communal lands”. It could be then interesting for the project to look into the development of communal conservancies where use rights of the natural resources are devoluted to communities according the certain rules. Namibia and Kenya have developed interesting experience in this regards, Namibia being now engaged in the development of cluster between national park, communal and private conservancies (under co financing with WB or UNDP or FGEF)

(b) Exchange between those different initiatives should be undertaken.

Opinion: favorable with recommendations (a) and (b)

✓ **Germany Comments**

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

Germany agrees with comments from STAP, especially with those concerning component 2. According to the PIF, the biodiversity of the Kidepo landscape faces

growing threats: wildlife poaching and bush fires, unsustainable use of natural resources, especially Shea tree and landless returnees living from charcoal production, and infrastructure placement. How many people/families etc. are currently living in the area, how many are expected to come? How will the project address the livelihoods of returnees? It is not clear from the project design how poaching and bush fires will be dealt with, as well as how returnees may participate in the project activities.

The proposed project aims at halting net loss of natural habitat in the critical landscape and at reducing hunting pressures by at least 40% in wildlife corridors and dispersal areas. The PIF should elaborate briefly on how the baseline on poaching will be determined and on the planned project measures to enforce the laws, especially how armed poachers from Southern Sudan will be controlled.

✓ *Denmark Comments*

- The involvement of people living and settling in the area is key, and understanding and addressing their needs is necessary (also mentioned by the Panel). The natural resources in this area seem largely to have been left untouched (though that is a bit unclear: is the area suffering from unsustainable use, or did the war facilitate a recovery of woodlands in this area? - both mentioned in PIF), except for limited local use. Now more people are coming into the area, and their expectation to sustain and increase the use of natural resources need to be dealt with. An expansion of the protected area (which implies no extractive use acc. to the PIF) will conflict with other expectations, and this needs to be reconciled. Furthermore, the corridors and adjacent areas to the protect areas are acc. to the PIF formally categorised as communal land, owned by communities, governed by customary law. It is important that the tools for an improved management is not solely enforcement in terms of policing, etc., but also involves creating incentives for sustainable behaviour. All in all, the involvement of people is not dealt with sufficiently.
- The PIF talks about the economic potential of tourism and the utilisation of shea trees for cosmetic purposes etc., but it seems not to be sufficiently included in the analysis and activities (especially tourism is weak). It is essential to understand the market conditions, which seems not to be properly analysed beforehand (a statement on measures to improve market for shea butter is included, and some names of companies are mentioned, but not elaborated). Without a solid market potential, these development perspectives are irrelevant.
- There are some references to the decentralised authorities, but as Uganda is famous for its decentralisation, one could expect more. Considering that the landscape based approach is opted for, this also seems odd. Also, no other natural resources related institutions are mentioned e.g. Ministry of Agriculture, Ministry of Tourism or similar. It is a well-established fact that protected area management need to relate to other sectors and themes and their management.

- No civil society institutions are mentioned, apart from the Rhino fund, which is not a local NGO. Private sector is mentioned, but with only limited details and it is stated they will play only a supportive role. The transboundary aspect of biodiversity is mentioned (South-Sudan), but not entirely clear how the project will deal with that.

WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(Reference GEF/C40.08)

CLIMATE CHANGE

**5. Regional: Pilot Asia-Pacific Climate Technology Network and Finance Center;
ADB/UNEP; ID4512**

✓ **French Comments**

The project intends to assist developing countries in Asia and Pacific to put in place appropriate policies and measures facilitating transfer of environmentally sound technologies through the establishment and strengthening of the network of national and regional centres, policy reform and demonstrations, and catalytic financing.

This is an operation in response to a project approach, where GEF funds are flowed for the benefit of the two GEF agencies, ADB (including softening its conditions for intervention in countries) and UNEP. It seems not responding to a request for regional organization or agency. Regional or local network are not yet identified. The design of the project at this stage is top-down.

Moreover, the remarks of STAP are shared. The project embraces too broad in terms of subject (adaptation, mitigation), technology, country, etc.

We might doubt (i) the sustainability of the program, (ii) its effective ownership by Asian countries are potential beneficiaries, (iii) its smooth integration into existing institutions and partner countries, without negative collateral effect, (iv) the relevance of the institutional set up and arrangements.

It would be relevant to mix the project proposed approach with a bottom-up approach, supporting cooperation between national institutions and decentralized organizations (institutions-driven rather than countries driven), based on more open regional call for proposals.

Opinion: favourable subject to complementary bottom-up approach

✓ **Germany Comments**

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

The project is highly welcomed to allow a prompt start of the Climate Technology Center und Network (CTCN) as one of the two key elements under the new Technology Mechanism. But the Title – only slightly modified from the original title – suggests that this project is already the implementation of the CTCN. This impression should be avoided, since a decision on the structure and function as well as the

interrelationship of the CTCN with the Technology Executive Committee is still outstanding; a decision is expected at COP 17.

We therefore suggest that the title and the approach are taking the open issues under the Technology Mechanism into account. GEF and the other funding agents should avoid the impression that the project is preempting any decision on the CTCN.

**6. China: China Renewable Energy Scaling-Up Program (CRESP) Phase II.
IBRD, ID 4493**

✓ **French Comments**

This project “CRESP II” targets commercial renewable energy development, with a focus on wind and biomass. It follows a CRESP I program and aims at scaling up activities of this first program.

Considering the history of CRESP, the concept would gain from more explicit references to the achievements of the first program and how it helped and fed the design of CRESP II. This applies in particular to the focus on wind and biomass which are already well developed renewal energies compared to others.

Opinion: favourable with the above remark to be taken into account.

7. China: Large-City Congestion and Carbon Reduction Project. IBRD ID 4500

✓ **French Comments**

This project proposes to support Chinese authorities, and more particularly the Ministry of Transport, to reduce traffic congestion in Chinese cities by promoting a shift to Public transport. The means to reach this goal would be infrastructure, policies, technical assistance focusing on Transport Demand Management. Three pilot demonstrations would be undertaken in Suzhou, Chengdu and Harbin.

The project's intentions are sound. They respond to a clear Chinese governmental priority. One can argue though that the focus of the project on Transport Demand Management is just one side of the problem. Transport congestion is also linked to urban planning, the distance people have to travel between their home, their work, and their places for leisure.

In other words, while it is clear that one single project can not on its own address all problems, the vision of the project seems too narrow both at analysing and addressing the problem.

(a) In this regard, the concept would gain from an initial analysis of the broader situation of transport in relation with urban planning approaches in place.

(b) The pilot demonstration operation would gain also from a linkage between transport and urban planning whether speaking about Management of Transport Demand in the long term or funding strategy of necessary infrastructure.

In the same line, the concept would also gain from an integrated vision of transport which is key to address congestion and CO2 emission.

Opinion: favourable with the above remarks (a) and (b) to be taken into account.

✓ **Swiss Comments**

Overall Commentaries

The project aims at reducing traffic congestion in large cities by encouraging people to shift to public transport modes. The goal of the project is to develop and demonstrate a comprehensive package of measures including infrastructure, policies, economic incentives and capacity building, to discourage private car use while supporting high-capacity, low-carbon transport modes. Three large cities are selected for pilot demonstrations under this project.

Traffic congestion is a serious problem in all large cities, thus the topic of the project is well justified. The main goal - shift of private car transportation to public transport modes - can be fully supported. However, we miss measures to encourage and promote non-motorized transportation.

Challenges, Questions and Concerns for further Project Preparation

A comprehensive strategy to reduce traffic congestion should not only promote a shift from private motorized to public motorized transportation, but also a shift from motorized to non-motorized transportation.

PIF shows that average travel speeds of motor vehicles will drop from 25 km/h today to below 15 km/h by 2015 in many large cities in China (p.5). The average travel length by motorized vehicle in cities is relatively short, e.g. in Chengdu 8 kilometres (p.8). Thus there is a big potential in cities to shift from motorized to non-motorized transportation, primarily cycling.

For this reason development and promotion of non-motorized transport should be included in the project (non-motorized transport policies, cycling lane infrastructure, pedestrian facilities etc.). Such measures can reduce traffic congestion, energy use and air pollution. Development of non-motorized transportation is in line with the 12th Five-Year Plan approved by the Government of China in March 2011 (PIF p.5) and with STAP recommendations (GEF-STAP 2010 "Advancing Sustainable Low-Carbon Transport through the GEF, A STAP advisory document")

Conclusions and Recommendations

We support approval of the project, but expect that in further planning special attention is given to amending the project by including substantial measures in the field of non-motorized transportation.

✓ Germany Comments

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

- 1) The overall project approach is supported. Projects on urban transport improvement, transport demand management and public transport are urgently needed in China. However, the relation and cooperation with the mentioned China-GEF-World Bank Urban Transport Partnership Program (CUTPP) need clarification. It should be ensured that capacity building on urban transport is properly integrated in the overall project design.
- 2) The way how GHG emissions are reduced, measured and monitored is not described in detail. The STAP comment on how the STAP methodology to

demonstrate GHG emissions is applied is a prerequisite for baseline development and demonstration of GHG emission reduction and needs to be taken into account. Measurement of transport emission reduction through TDM and other urban transport measures is also included in German-Sino projects as well as efforts of the ADB to provide TA in China.

- 3) Coordination with transport related projects of the German government is advisable. Coordination with the transport component of the Sino-German BMZ Climate-Programme, the Sino-German project on electric mobility and climate change and the project on transport demand management and climate protection in Beijing (all implemented by GIZ) as well as training courses developed within the "Sustainable Urban Transport Project" should be ensured and synergies explored. This is especially true for efforts on capacity building and GHG measurement.
- 4) It would be useful to define clear milestones that on the one hand show the progress and success of the project. On the other hand, these milestones also could be used to ensure cooperation with a number of projects on urban transport in China.

**8. China: Green Energy Schemes for Low-Carbon City in Shanghai, China
IBRD; ID 4488**

✓ **French Comments**

The project aims at developing a low carbon approach on the district of Changning in Shanghai. The project presents a multi-sectorial approach by targeting green buildings, low carbon energy mix, green transport, integration of green energy schemes to achieve low-carbon objectives.

The multi-sectorial approach of the project is to be welcomed. The integration between the different sectors is key to maximise the reduction of urban CO2 emissions and the project can rely on the solid experience acquired by past projects sector by sector.

Nevertheless, it appears that the proposal could go further in term of integration. It proposes to work one three sectors in parallel rather than develop a real integration between them.

As quoted in Chapter B1 of the PIF, the promotion of compact urban forms is core to a low carbon city development and the project would gain from engaging the urban planning aspect at the level of the district to ensure better integration between housing, energy and transport aspects.

Opinion: Favourable with the above remark on integration to be taken into account.

✓ **Swiss Comments**

Overall Commentaries

The Government of China is operating a pilot programme on low-carbon city development in 13 cities and provinces. The NDRC low-carbon pilot cities and provinces are expected to lay the groundwork for a national low-carbon planning, assessment and management system that should include guidelines for industry, society and economy. This project's objective is to contribute to this concept development in changing district in Shanghai. The project focuses on green buildings, low-carbon energy mix, low-carbon innovative technologies and integration of low-carbon integrated urban transport options. It will support the Chinese government's 12th five-year plan.

While the overall concept is sound and well anchored in China's national priorities, some concerns are raised and suggestions are made for more detailed analysis with regard to the low-carbon transport options proposed for inclusion. As GEF funds are

limited considering the size of the envisaged overall investment, the project will benefit from a clearer focus in the use of GEF resources.

Challenges, Questions and Concerns for further Project Preparation

- The information contained in the tables on the “*strategic*” and on the “*project framework*” in the PIF document seems not to be fully consistent. While the *strategic framework CCM-1* on “innovative low carbon technologies” expects “new business models for electric vehicles demonstrated (EV in use as passenger cars)”, the green transport section of the *project framework* provides “Electric vehicle (buses) feasibility studies piloted” as expected output. Considering that the budget allocation for green transport is quite limited and electric buses pilot trials are anyhow ongoing in different Chinese cities, a clearer focus of the urban transport intervention at a district level is recommended. A district in a large city like Shanghai only has a limited planning capacity influencing particularly the urban mass transport system as a whole. Focusing on innovative business models for captive EV fleets or pilot measures enhancing the share of citizens using non-motorized transport seem more promising for implementation at a district level. For successfully testing new business models for electric vehicles (EV), the project duration of 48 months is in itself quite a challenging task as the economic viability of such a scheme will depend on the capacity to resolve several of the still remaining down-to-earth challenges linked to application of the EV technology. These challenges are particularly linked to the level of service and reliability of EVs in different seasons and under different user patterns of companies.
- What will be the strategy for replication in other cities?

Conclusions and Recommendations

Switzerland welcomes this ambitious World Bank project proposal and recommends its approval by GEF. In the further process of Project document preparation more effort however should be made to integrate more detailed analysis particularly related to the urban transport part and integrating this into the overall project design. Considering the entire project, this is a minor revision.

✓ Germany Comments

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

- 1) The proposed project aims at both retrofit of existing buildings and piloting of new near zero emissions buildings. Given the poor constructional quality of a large part of the Chinese building stock and the short life cycle resulting thereof, World Bank should consider to focus more on economically feasible and replicable technologies for new buildings. This could lead to a higher mitigation impact for the given investment, as cost-effectiveness usually is much lower for existing than for new buildings. Piloting of near zero emission buildings, as envisaged in the proposed

project, would imply very high costs compared to more marketable solutions that also allow for high mitigation effects. To concentrate on economically sustainable solutions for new buildings would furthermore help mitigate the collective action risks associated with the proposed project (multi-owner situations, split-incentive problems, etc.).

- 2) Up to now, information on the expected mitigation volume has only been provided with regard to the overall mitigation potential in the pilot area. World Bank should provide this information on the expected mitigation volume as soon as available. Compared with the overall investment, 160 kt CO₂ appear to be a rather limited amount. This point should be considered in the explanation. World Bank should also provide information on how to ensure that the purchased “green electricity” implies additional mitigation (e.g. through labeling).

9. Nigeria: Small-scale Associated Gas Utilization; IBRD; ID 4490

✓ French Comments

For projects in the urban development strengthen the integration of sub sectoral activities, Transport, Construction and Planning (projects in China, Nigeria)

Ensure complete top-down approaches with bottom-up approaches (Operation Program in Asia).

Ensure integration of local projects and small scale projects in national strategies (project in Nigeria)

This proposed World Bank project aims to assist the Government of Nigeria in the development of small-scale flaring gas utilization for energy needs of rural communities. GEF funds are sought to assess the technical and economic viability of flaring gas utilization including use of captured gas for generating energy for the electricity grid.

Gas flaring reduction projects are usually successful examples submitted under Clean Development Mechanism (CDM) and there are a number of approved methodologies along with accumulated experience. The World Bank led Global Gas Flaring Reduction Public Private Partnership (GGFR) was established to assist governments and private entities in building CDM capacity for gas flaring projects in oil and gas sectors, including in Nigeria. It seems that the submitted project emulates GGFR efforts without justifying a specific incremental role of GEF funding. If GEF and CDM resources are to be blended, the complementarities or synergies have to be explained and utilized.

Lessons learned while working on gas flaring project in Nigeria under this initiative should be analyzed and accounted for in the project design.

We share also the following STAP recommendation. The project emphasizes investments in small-scale utilization of the associated gas. Nigeria is facing a number of critical policy, institutional, capacity building, and technological, financial and other barriers in utilizing associate gas in oil and gas sectors. Without removing these higher-level barriers, long-term sustainability of project interventions can be compromised. Detailed barrier analysis for the sector and gas flaring particularly is recommended before CEO endorsement. Project's focus on small-scale gas utilization has to be justified in the context of the overall baseline situation of gas flaring mitigation efforts in Nigeria.

Opinion: favourable taking above remarks into consideration

✓ Swiss Comments

Overall Comments

The project aims at deploying existing technologies that are not adopted in Nigeria yet in order to use the associated gas that would otherwise be wasted in the process of oil exploitation. The project addresses an important source of GHG emissions in Nigeria (gas flaring represents approx. 30% of Nigerian CO₂ emissions). The project is closely linked to a project financed by the World Bank (“Nigeria Rural Access and Renewable Energy Project”): the associated gas will be used to provide energy for rural populations, which are especially disadvantaged people. In addition, the project is consistent with the World Bank’s Global Gas Flare Reduction Partnership.

Questions, Concerns and Challenges for further Project / Programme Refinement

- The project document identifies two barriers for the lack of deployment of technologies to avoid gas flaring, namely a technological barrier and policy one (lack of enforcement of rules by the government to stop gas flaring). Therefore, how will the question of enforcement be dealt with in the framework of this project? “The dissemination of the results of the successful demonstration project will (...) assist the Federal Government of Nigeria to develop effective policies to support gas flare reduction” (p. 7). Should the policy aspect not be developed at the same time as the demonstration project, so that the appropriate framework is ready for the replication phase? This aspect is important in order to go beyond the technological barrier that is only one of two obstacles.
- The project is designed as a demonstration project, to be replicated in a second step (with five similar projects at least). What is the strategy for replication and dissemination of results? What are the obstacles and risks for the replication phase? The project document mentions that “there is a risk that replication will be slow to materialize” (p. 9). What are the possible solutions?
- Why has the CDM not been able to work for gas flaring in Nigeria yet? What are the possible links between this project and the development of CDM projects to take over the GEF financing?
- It seems that the project will help solve the issue of lack of access to modern energy services thanks to the production of electricity with the associated gas. What is the potential for contributing to solve this issue in the medium term?

Conclusions and Recommendations

The project addresses an important issue and has the potential to help addressing additional problems in Nigeria such as the lack of access to energy (World Bank project on access to energy). These synergies are positive.

Thus, Switzerland supports the approval of this project.

It recommends however that the project addresses right from the beginning a) the policy issue (lack of enforcement of rules by the government to stop gas flaring) and b) the strategy for replication, so that the project has a greater potential to have results on a wider scale and over time.

✓ *Germany Comments*

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

Germany welcomes the PIF and the intention to reduce Greenhouse gas emissions through a reduction of gas-flaring at oil-production facilities. Germany supports the comments provided by the STAP and suggests that the proposed improvements be incorporated into the final project proposal.

MULTIFOCAL AREA

10. Regional - Sahel and West Africa Program in Support of the Great Green Wall Initiative

✓ **French Comments**

Seeking for synergies between multilateral financing and/or bilateral if possible (Turkey, Green Wall)

For projects under programmatic approach, ensure good overall consistency versus a collection of projects (Green Wall)

The initiative is an important contribution to support integrated approaches in the Sahel zone (12 countries) based on two main principles: environmental sustainability and food security.

The program supports national project in the main sector affected by land degradation: agriculture, food security, risk management, rural development and watershed management.

Several improvement of the programme is needed:

- a) The economic rationality is not convincing: (see C. “Innovations and economics” p22 and component 3 of the project “Innovations and economics” p4) when it states that Payment for Ecosystem Services and ecotourism will contribute to the create incentive for better management practices. First, in the project areas there is little example of PES really effective on the ground because the control of the quality of the services maintenance and payment to the local communities for the maintenance of the services is very weak. Moreover, the development of ecotourism in the majority of the participating countries seems an illusion with the development of terrorism in the Sahel. For information, European citizen are strongly discouraged to travel Mauritania, Mali, Niger, Chad, and Soudan.
- b) The economics and comparative advantages for the local rural producers in the adoption of new SLWM practices compared to their previous unsustainable practices are not explicit: the program is not clearly based on previous projects successes and experiences, with clear and practical methodologies.

- c) This initiative could benefit of strong links with different projects supported by French cooperation in this region, in particular with the CILSS (Mitigation in agriculture sector, Sustainable forest management, Reduction of land degradation), with CIFOR (Mitigation in forest sector) and with the Transboundary Basin Authorities (OMVS, NBA, VBA, CBLT). We recommend strengthening these links

Opinion: favourable, if the above recommendations are taken into account during project development.

✓ Swiss Comments

General Comment

Switzerland welcomes the program proposed as a significant and most relevant component. It offers an important opportunity for the 12 countries of the Sahelian Africa. For further development of the program together with the countries involved we propose the following:

- Strengthened regional cooperation elements with associated knowledge management components
- Appropriate results and indicator framework for SLM
- Co-financing

Questions, Concerns and Challenges for further Project Preparation

- ▶ Regional exchange and learning in view of a more effective knowledge management.

One concern is that not enough is invested in regional exchange and learning in view of a more effective knowledge management. This should be one of the major benefits of a regional program.

Indeed, these aspects are mentioned repeatedly in the PFD. There is a project of 10 Mio USD as a baseline and 3 Mio USD as GEF co-financing. However, this represents less than 1% of the total funding.

Only 5 implementing regional bodies are mentioned in the proposal. They have to deal with wide-ranging and complex issues such as degradation monitoring, SLWM practices, agro-meteorology, nature conservation and others. Many other scientific and technical organizations and networks could be mentioned which would also be able to contribute to knowledge management and learning.¹ Even considering that

¹ For instance, WOCAT, an international network, and recognized in UNCCD circles as the leading network on SLM practices, with partners in the region, could contribute effectively to knowledge management for SLM and support monitoring and assessment of SLM.

the individual projects would also invest in knowledge management, the very existence of a regional program would justify higher investments.

The scientific basis of the program is not very strong and scientists still have problems in defining desertification, SLM and define adequate indicators and methods for M&E. Thus investments in knowledge generation and sharing of good practices, in order to avoid implementation of approaches and technologies without adequate information on their costs, benefits, impacts and barriers to implementation.

- ▶ Open questions regarding performance indicators for the program

Naturally at this stage, the key performance indicators of the program are very generic and defined only in qualitative terms. As long as they are not quantified, the evaluation of the performance will be rather arbitrary. Regarding the key performance indicators (2) and (4): to what degree can a change of trends be attributed to the program's interventions? The proposed program is not the only effort which interferes with the indicators mentioned.

- ▶ Open questions regarding the considerable amount of 1.8 billion USD of indicative co-financing.

We very positively appraise the enormous amount of co-financing of 1.8 billion USD. No doubt, the existence of important co-financing influences positively on the assessment of the program. However, there are questions regarding the nature of this co-financing and if it can be qualified as such.

On page 3, the PDF clarifies that this co-financing refers to planned baseline investments in the 12 countries! Therefore the question is whether all that baseline cost can be qualified as co-financing, in accordance with GEF policy. Please note that if baseline costs are considered as co-financing, the proponents should provide detailed information on it.

Moreover, according to the PDF's table (C) on the indicative co-financing by source and by name, the GEF agency is indicated as source of co-financing for the amount of 1.735 billion. More clarification would be needed.

✓ Germany Comments

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

Germany welcomes the programmatic approach and the general outline of the proposal, but proposes significant improvements. The common programmatic denominator of the

list of national projects is not sufficiently elaborated. The added value of assembling national projects under a program umbrella seems to be limited to joint monitoring and a regional knowledge management instrument.

Approach: While the World Bank and GEF, confirmed by the preliminary project outlines and GEF statements, clearly see the Great Green Wall Initiative as a concept advocating for enhanced country-wide investment and capacity building in the Sahel region, some of the Governments promoting the Great Green Wall Initiative rather advocate for a concept of a 15 km integrated development zone stretching from Dakar to Djibouti. Consequently, actual national concepts (such as the one from Mali focusing on a linear development zone with 46 communities along a 1800 km line) might have regional overlapping with the proposal, but not necessarily the same approach and governance requirements. For the sake of avoiding future conflicts, especially on governance issues, the overall programmatic approach and the scope of the projects (e.g. national, cross- border ...) should be clarified. The role of decentralized planning and implementation needs to be better elaborated.

Scaling up: Scaling up SLM on the basis of existing best practice is a major promise of the proposal. The proposal presents bottlenecks for scaling up, but needs to be much more precise on strategies for scaling up - including those strategies deriving from the TerrAfrica experience.

Knowledge management is to be a pillar of the regional dimension of the program. The proposal should elaborate on the concept of knowledge management and lessons learnt from the experience in knowledge management under TerrAfrica. Knowledge management limited to the existing TerrAfrica web page is not a sufficient approach.

Governance and Institutional set-up: The newly founded Pan African Agency for the Great Green Wall is to play a key role in political coordination, advocacy and knowledge management. Similar tasks are allocated to the AU/NPCA without clarifying roles and responsibilities between these two institutions.

Link with TerrAfrica: The proposal presents the program as a TerrAfrica program. It should therefore be made clear in which way TerrAfrica's mission, objectives and action lines are still valid. Coalition building, one out of three TA action lines is not mentioned in the proposal. The proposal should explain how the existing TerrAfrica platform is to be used, maintained or replaced under the program. In general, lessons learnt from the first TerrAfrica phase should be presented.

Co finance: Possible co-finance commitments should be clarified. Partners during the Bonn conference have expressed support, but none has announced co-finance for the program.

Germany requests the World Bank and the GEF Secretariat to provide, starting at the spring 2012 Council meeting, an annual information document on the status of the Program This information document should provide answers to the above comments.

11. Belarus - UNDP - Landscape approach to management of peat lands aiming at multiple ecological benefits. GEF ID = 4419.

✓ Swiss Comments

General Commentaries

The attention given by the proposal to the conservation and sustainable use of biodiversity-rich peat-lands in Belarus appears well justified in view of the past large-scale destruction of this important ecosystem in favour of agriculture and other unsustainable use in the country and the region at large. Also peat-land ecosystems are currently under-represented within the country's protected area system. Central to the project is the enhancement of peat-lands currently under protection, the rehabilitation of degraded peat-lands, and the creation of new protected areas with focus on peat-land ecosystems and corresponding support zones. The creation and proper planning of support zones of protected areas is commendable.

Challenges, Questions and Concerns for further Project Preparation

- (1) The proposal claims to adopt a "landscape approach" to peat-land management without further specification and/or explanation of how this will be achieved in the absence of meaningful participatory multi-stakeholder integrated spatial land-use planning on the national, regional and local level in Belarus. In this context it is suggested that there is an urgent need to critically review the existing "territorial planning and land stratification" system in the country and to re-classify land-use polygons which obviously are of a wrong land-use designation (category). It should be noted that "territorial planning" during the Soviet era as applied to all CIS countries - Belarus being no exception - strictly aimed at maximizing agricultural productivity and expanding agricultural land with little concern given to land-use sustainability and/or conservation needs, a practice seemingly still adhered to today. Further details are needed in the full project document on how this issue will be addressed.

In this context it also would be interesting to learn how the UNDP-implemented GEF project on "mainstreaming biodiversity management into territorial planning" (2010) in Belarus intends to deal with the issue of participatory integrated spatial land-use planning.

- (2) It appears that the overriding objectives of current Government sponsored activities related to peat-lands and interventions proposed by this project (i.e., peat-land

rehabilitation and enhancement) are lop-sided, favouring economic enhancement/opportunities rather than biodiversity conservation and optimal land-use (i.e., hydro-technical facility improvement of degraded agricultural peat-land aims at improvement of agricultural productivity rather than conservation). This attitude may also be reflected by the project's intention to create new protected areas of peat-land ecosystems by using the equivalent of IUCN categories 4 and 6 representing multiple-use areas of the lowest legal protection status, contributing only marginally to biodiversity conservation.

- (3) Under the baseline scenario of the proposal, the current lack of local community participation in protected area management is highlighted but is not addressed under the incremental value discussion. Further details are needed in the full proposal of how to achieve co-management of protected areas in the absence of the legal basis for different forms of PA governance in Belarus.
- (4) Further detail is needed on the proposed “mosaic landscape planning” approach in context with the establishment of support zones of protected areas. Further detail is also required on the land tenure issue related to multiple use peat-lands and protected areas.
- (5) The risk assessment of the proposal fails to address the lack of integrated spatial land-use planning and the lack of corresponding legal and policy framework (i.e., important prerequisite for wise land-use planning and land-use decisions regarding support zones of protected areas).

Conclusions and Recommendations

The project addresses protection and sustainable management needs of important ecosystems in Belarus and offers options and strategies of how this will be achieved. It is expected that the full project document, however, will provide more detail and in-depth discussions of issues mentioned above. The proposed project meets GEF criteria and should be endorsed in principle.

✓ Germany Comments

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

While the project has the goal to deal with the peat issue in a holistic approach at national policy level, the aspects of ongoing large-scale peat extraction are not fully taken into account. It is furthermore not clear, how far the degraded agricultural and forest peat lands contribute to the GHG emissions in comparison to peat mining. More information on these aspects is required to better understand the relevance of the project.

The economics of peat management is not well elaborated. The project proposal mentions the State Program on the Reconstruction of Drainage Facilities, which is a 150 million USD operation over the next five years, and which may have detrimental effect on much of the agricultural and forest peat lands. This programme aims at reconstructing drainage facilities and may thus lead to an immense degradation of peat and subsequent GHG emission. This programme should thus not only be mentioned as one of the ongoing operations, but it may be necessary to design the UNDP-GEF project around this programme, if the project wants to achieve results at the national level.

Output 2.1.3 considers the transfer of ownership of peat land (“Restored land re-classified as pastures or protected areas and transferred to a new owner where appropriate”). Normally, one would expect this to be a major issue with heavy social and economic implications. The consequences of this ambitious undertaking need to be better elaborated.

12. Bolivia - Fifth Operational Phase of the GEF Small Grants Programme in Bolivia

✓ **French Comments**

Assessment with best possible lines (biodiversity projects) and assessment of previous phase before ne project phase (projects Mexico and Bolivia)

The project's objective is to contribute to the fifth operational phase of the GEF/UNDP Small Grants Programme (SGP) in Bolivia.

Same comment as the previous one:

The PIF lacks of an assessment of previous SGP supports, successes and failures and the current status and needs in capacity building of the Bolivian grant beneficiaries. There is some information on the global SGP program outcomes, but very general information on the Bolivian SGP results and national CBOs issues and needs.

Opinion: Favorable, subject to assessment of the CBOs previous support.

✓ **Denmark Comments**

- The analysis of the challenges and opportunities for protected areas management is satisfactory, albeit a stronger institutional analysis could have been desirable.
- While relevant in terms of content, the relatively wide array of different activities could imply a risk of diluting the overall impact of the intervention. However, this may be mitigated by aligning to the existing framework for PA management and the management plans to be elaborated by the PA management committees.
- The project description mentions consultation with national and local institutions, relevant to protected areas management, among others, regarding identification of the 4 areas of intervention and with the PA management committees on the selection of species. While it is described how the project will complement government efforts and other donor supported interventions in the fields at stake, it is not clearly described if and how more direct collaboration and alignment will be promoted between the project interventions and government and local institutions. A point in case is the National Protected Areas Service (SERNAP), which is also receiving support for protected areas

management from a series of donors including Denmark. Stronger alignment to relevant national institutions could contribute to enhance the impact and sustainability of the intervention.

- The proposed intervention is in line with both some of the most important international conventions in the fields of biodiversity, land degradation, climate change, wetlands and endangered species, as mentioned in the project documents. In connection with international programmes related to climate change, the REDD+ programmes are mentioned as an opportunity referring, among others to the preparation of the National UN-REDD Bolivia Programme agreed in 2010. However, in this context the political reservations expressed towards the REDD concept by the Bolivian Government it might also have been worth mentioning.

13. Jamaica - Integrated Management of the Yallahs River and Hope River Watersheds

✓ French Comments

The project aims at improving the Jamaican capacities in watersheds management at national, regional and local levels. The project is focused on main sectors affected by land degradation: agriculture, environment, forest and water management.

Regarding the threats in the watersheds selected by the project (biodiversity, deforestation, land degradation), the project seems to be relevant. It is expected that the project will support the establishment of Payment for ecosystem services. This component will be particularly innovative in Jamaica.

Opinion: favourable

✓ Swiss Comments

Overall Commentaries

The project seems to correspond to the GEF's objectives. However the STAP raises doubts on the global environmental benefit of the output "...*developing land-use plans at the national and local levels which incorporate valuation of biodiversity and ecosystem services.*" (focal area strategic framework, BD-2, 2.2).

The document explains the need for the project with the threats of the "business as usual scenario" (PIF, p.5 and 10). However the project justification argues that the high number of organizations implementing activities in the watersheds consist of an insufficient national response lacking *planning and data to inform land-use decisions and protected area management*. Nevertheless the proposed project is mainly adding new activities to the many already existing ones and does not clearly show the complementarity of these outputs to lead to better outcomes. To do so, the project would need conceptual coherence.

Conceptual weakness is visible in the rationale and concept of sustainability. *SLM*, *SL/WM*, and *SFM* are used in the sense of mainstream understanding without any concept of how to achieve it by the consequent integration of the local resource users by integrating local knowledge and participation of stakeholders in designing of solutions. *Sustainable financing* of park areas is to be achieved by payment for environmental services (PES) without consideration of the risks of the approach and the general concept of institutional compensation which may be more coherent for the specific situations.

Challenges, Questions and Concerns for further Project Preparation

The major question remains on the added value of the project joining many other programmes and project in a rather focused area (the real size remain unclear). In this situation the goals of the project should show a clear complementarity in the approach and the outputs fostering thus sustainable resource management.

The ecological situation and on-going degradation of resources are not coherently presented. It remains unclear why reforestation should take place whereby the deforestation is going on and agricultural land is reduced by settling pushing the dwellers into the upper watershed. It is also unclear how water scarcity arises in this humid agro-ecosystem. The objective of capacity development seems in this situation very reasonable but the activities proposed are not adequate to achieve progress. Learning on the community level should be related to learning in institutions at higher levels. Such approaches for integrative learning and trans-disciplinary action research exist and would create an added value for this project.

We agree with the comments from the STAP that the PES may create risks for the proposed project. The use of PES for investment and small grants is not in the logic of compensation of ecosystem services.

In the further project preparation it would be beneficial to review the fundamental approach and search for concepts and methods to respond to the specific weaknesses of the on-going and already planned interventions in the watersheds.

Conclusions and Recommendations

We recommend addressing the above mentioned issues in the further process.

✓ *Germany Comments*

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

The proposal covers the relevant topics for sustainable development in land and water management and conserving biodiversity. The full proposal should clearly identify the linkages between biodiversity and sustainable land management and the resulting impacts on livelihoods. It needs to be analysed in which relevant sectors the linkages and impacts of biodiversity and sustainable land management can be integrated.

The process of an economic evaluation of ecosystem services needs to be further elaborated and analysed how this process can contribute to development planning in relevant sectors.

In addition it is relevant to identify opportunities and constraints for up-scaling successful local activities in order to disseminate and embed successful approaches at different levels. Prior to this, an adequate up-scaling approach needs to be defined.

14. Mexico - Fifth Operational Phase of the GEF Small Grants Program in Mexico: UNDP: 4353

✓ **French Comments**

Assessment with best possible lines (biodiversity projects) and assessment of previous phase before new project phase (projects Mexico and Bolivia)

The project's objective is to contribute to the fifth operational phase of the GEF/UNDP Small Grants Programme (SGP) in Mexico.

The PIF explains very clearly how the SGP is consistent with the GEF focal area strategies and national strategies/plans, which is a very good mainstreaming exercise.

But the PIF lacks of an assessment of previous SGP supports, successes and failures and the current status and needs in capacity building of the Mexican grant beneficiaries. There is some information on the global SGP program outcomes, but very general information on the Mexican SGP results and national Community Based Organisations issues and needs.

Opinion: Favorable, subject to assessment of the CBOs previous support.

15. Turkey - Integrated Approach to Management of Forests in Turkey, with Demonstration in High Conservation Value Forests in the Mediterranean Region; UNDP; 4469

✓ **French Comments**

Seeking for synergies between multilateral financing and/or bilateral if possible (Turkey, Green Wall)

The project is an important contribution to National Climate Change Strategy focused on Forest Sector Management. Forest covers about 27 % of Turkey (21 millions ha) and constitutes the largest Mediterranean forest. This forest could store more than 300tCO₂/ha.

The main threats to these forests derive from anthropogenic wildfires, unsustainable fire wood collection by local populations, illicit timber harvests and pests.

The project will contribute to reduce these threats: fires, unsustainable logging and pest. Actually, FAO (Silva Mediterranea) is building a regional initiative aiming at supporting a regional approach for reduce carbon emission in forest sector.

This initiative is funding by GIZ and FFEM, linked with many others regional bodies (IUCN, WWF, UNEP/Plan Bleu ...).

It should be relevant that GEF Project co-ordinate this activity with FAO regional initiative.

Opinion: favourable subject to focus coordination with others actors

✓ **Swiss Comments**

General Commentaries

The proposed project aims at the sustainable management and protection of Turkey's biodiversity-rich Mediterranean forests, capitalizing on its enormous potential as one of the largest forest carbon depositories in West Asia and Europe. The ecological integrity of the targeted forests is currently threatened through land alienation, unsustainable use, forest fires/pests, and fragmentation. The project offers interesting and innovative interventions expected to contribute to the solution of identified key problems. The proposal meets GEF financing requirements and builds on lessons learnt from past and on-going donor-supported activities in the target area and the region at large.

Challenges, Questions and Concerns for further Project Preparation

- (1) The promotion of solar collectors appears to be a key pillar of the proposed strategy in support of reducing the pressure on forests by the rural poor in need of fuel-wood for cooking and heating their homes. If solar energy is used exclusively to satisfy the hot water needs of households (see proposal), however, the demand of fuel-wood for heating and cooking would remain the same. Considering an average demand of 10 to 15 cubic meters fuel-wood per family, how will the demand be met or which alternative would be offered to the use of fuel-wood? Supporting data on the reduction in fuel-wood demand resulting from the proposed use of solar energy are missing. This issue is not mentioned in the risk analysis either.
- (2) Although the proposed creation of protected areas within the framework of the project is laudable, protected areas equivalent to IUCN categories 4 and 6 (lowest protection status of multiple use areas) as proposed by the project will add very little to the country's PA system under the CBD. Furthermore, such areas require inter-institutional and multi-stakeholder management due to overlapping jurisdictions and mandates which appears to be insufficiently addressed by the proposal.
- (3) A brief description and discussion of land tenure (issues) in the target area would be helpful.
- (4) The risk assessment proposes "engagement of local people in the design of management plans for protected areas" but fails to address the need for co-management of PAs as a prerequisite for PA neighbours to develop ownership in conservation.

Conclusions and Recommendations

The proposal is well researched, logically conclusive and timely in view of expected adverse impacts due to global climate change. The proposal addresses key issues of local and global importance and offers feasible solutions to root causes of forest destruction and degradation in a selected pilot area. The multi-pronged approach to achieving sustainable forest management through tackling identified root causes is laudable. The project concept is scientifically and technically sound. Switzerland therefore recommends its approval by GEF.

Since the promotion of solar collectors appears to be a key component of measures aimed at the reduction of current fuel-wood demand, the proponent may want to stress the promotion of energy-saving measures on a household level (fuel-efficient stoves, energy-efficient house construction/materials, roof and window insulation etc.) in order to reduce heat loss in winter, hence reducing fuel-wood needs.

Other comments

- ▶ Please elaborate measures to be taken in context with "proactive pest management".
- ▶ Please explain how "income sources of local communities will be diversified through sustainable forest management".
- ▶ Please explain how "carbon pools in high value forests" will be enhanced; high value forests in ecological or economic terms?