



**GLOBAL ENVIRONMENT FACILITY**  
INVESTING IN OUR PLANET

COMPILATION OF COMMENTS  
SUBMITTED BY COUNCIL MEMBERS  
ON THE GEF  
DECEMBER 2018  
WORK PROGRAM

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEF December 2018 Work Program

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**DECEMBER 2018 GEF WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE: GEF/C.55)**

**BIODIVERSITY**

- 1. China: Strengthening the protected area network for migratory bird conservation along the East Asian-Australasian Flyway (EAAF) in China (UNDP) (GEF Project Financing: \$8,932,420) GEF ID = 10073**

✓ *Norwegian-Danish's Comments*

- Analysing the fragmented habitat / ecosystem framework underpinning the existence of a number of migratory bird species in a comprehensive manner, and basing new conservation measures on such analysis, seems to be an innovative way when seeking to manage and conserve these species.

- 2. Chile: Strengthening management and governance for the conservation and sustainable base of globally significant biodiversity in coastal marine ecosystems in Chile (FAO) (GEF Project Financing: \$3,502,968) GEF ID = 10075**

✓ *United States Comments*

*Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.*

- Can the agency more fully explain if and how local level inputs regarding governance (not just resource use) will meaningfully incorporated? A key barrier to the previous project was the lack of stakeholder participation in the management process. How does the current project directly address this?

- 3. Argentina: Mainstreaming biodiversity conservation criteria in sectoral and intersectoral public policies and programs to safeguard threatened wildlife in Argentina (UNDP) (GEF Project Financing: \$2,703,196) GEF ID = 10085**

✓ *United States Comments*

*Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.*

- Could the agency clarify the approaches proposed here regarding the reduction of wildlife trafficking and poaching, and if there are demonstrated links between

the hunting of endangered large carnivores by livestock producers and trafficking in wildlife?

- At various places in the proposal, the activities appear centered on very distinct approaches, including (1) awareness raising of the general public and interest groups, (2) promoting a 'formal, more efficient management framework', (3) developing 'regulations that achieve unified interjurisdictional hunting controls', and (4) the development of tax/financial incentives to compensate livestock producers. Clarity on the proposed activities and the reasons for them would be appreciated at this stage.

## CHEMICALS AND WASTE

### **4. Turkey: Enhancing environmental performance in the expanded and extruded polystyrene foam industries in Turkey (UNIDO) (GEF Project Financing: \$3,195,000) GEF ID = 10082**

#### ✓ France's Comments

The project addresses one of the newly listed POPs in the Stockholm Convention and links to the Montreal Protocol. It also deals with mosses. It's innovative and relevant.

It is significant that, among the criteria for selecting companies, the links to ongoing projects under the Montreal Protocol are taken into account for XPS foams.

The expected results are the elimination of 26% of the total HBCD volume in the EPS and XPS foam sector, which represents a significant volume. It would be interesting to know:

- the cost - effectiveness ratio of technologies;
- the additional costs of investment and exploitation of these, if any.

### **5. Mexico: Reducing global environmental risks through the monitoring and development of alternative livelihood for the primary mercury mining sector in Mexico (UNEP) (GEF Project Financing: \$7,035,000) GEF ID = 10086**

#### ✓ Norwegian-Danish Comments

- We appreciate the approach used in this project, especially the fact that the project includes the introduction of alternative livelihoods for the local population when mercury mining ends. The project includes drafting of relevant regulation which we would assume Mexico was prepared to undertake without GEF support.

#### ✓ France's Comments

The project is interesting because it deals with primary mining, risk management and alternative livelihoods. However, it deserves a number of clarifications:

- Take into account the informal sector in risk analysis (involvement, membership, risks of "putting back into service" abandoned sites, etc.);
- Plan activities with the informal sector which is a crucial factor of impact;
- Better explain the synergy with past and current programs and projects in order to demonstrate complementarity and avoid duplication (in particular, the project must be in line with the GEF project "Development of Minamata Initial Assessment in Mexico");
- Clarify the role of stakeholders, especially the private sector;
- Detail the standardized method for developing or updating the national characterization and the national risk management approach in relation to mercury.

✓ **United States Comments**

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Some general concerns about the approach under Outcome 2 (“Miners in Queretaro adopt alternative income generation activities”. In light of the long history of mining and the prior statements of lack of alternative livelihoods, the outputs proposed are not as robust as we may have hoped – can GEF expand on this?
- Output 2.1 sites the development of pilot projects but does not discuss how they will be structured to ensure uptake of the lessons learned by the target communities. Can GEF expand on how it will go beyond simple involvement of the community?
- Output 2.2 assumes that eco-tourism or reforestation will provide adequate and enticing alternatives. Can staff provide empirical evidence for this assumption prior to substantial investment in work in this area? It would also be good to address the re-mining for the silver as a target livelihood for the community. Since the proposal mentions this as an objective for some in the community, it may be more fruitful to ensure that not only are there better environmental safeguards, but that the project (might) support the implementation of higher yield, lower impact approaches for metals recovery as a viable option.
- Could the agency expound on why the three potential alternate livelihood options (eco-tourism, reforestation, and mining extraction of alternative minerals) are assumed to provide adequate and alternate livelihoods?

**7. Argentina: Environmentally Sound Management of POPs, Mercury and other Hazardous Chemicals in Argentina (UNDP) (GEF Project Financing: \$8,930,250) GEF ID = 10094**

✓ **United States Comments**

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Are there any plans for an Environmental Impact Assessment for mercury waste disposal site?
- Where will the waste be disposed of?
- Will the liquid mercury waste be treated before disposal to prevent volatility and risk of leaching into environment? These points should be touched upon more concretely.
- In order to locally dispose of mercury, the elemental Hg will likely need to be treated/stabilized. Will this happen locally?
- If so, what is the feasibility/profitability of such a stabilization facility established in Argentina?
- If there is not sustained supply of mercury to be treated over time, such a stabilization facility would not be profitable, therefore the project would be unsustainable.
- Can the agency clarify that a more robust description of the mercury waste disposal site will be made available in the forthcoming PPG?
- Has GEF considered a regional approach, where Argentina could potentially act as mercury stabilization service provider for its neighbors in order to ensure profitability/sustainability? (Basel Convention import/export regulations would need to be harmonized across the region to facilitate flows of Hg for treatment and disposal purposes.)

**CLIMATE CHNAGE**

**8. Algeria: AIM-WELL: Algeria Integrated Management of Waste Energy at the Local Level (UNDP) (GEF Project Financing: \$4,416,210) GEF ID = 10080**

✓ **Norwegian-Danish's Comments**

- The integrated management of waste energy in Algeria is deemed as both relevant and taking into account important contextual elements.
- Strengthening of the waste management systems in Algeria seems to be very much needed, thus the project should be well justified. The fact that it will build on exiting/preceding projects with both the EU and GIZ gives reassurance that

this the project is not starting from scratch. Development of value chains for waste treatment is cumbersome and takes time. It should be noted that the project is ambitious, with need for development of policy and regulatory framework and substantial TA (capacity building and education on several levels), alongside the investments.

- We note that the project will “stress the 3 Rs – reduce, reuse, recycle”. This is a good principle but needs further elaboration. Such a project should be based on the full waste management hierarchy: prevent-reduce-reuse-recycle-recovery (and ultimately disposal). Although there are activities included on outreach, what the project aims to achieve in terms of prevention, reduction and recycling remains unclear.
- Recovery (waste to energy and fertilizer production) is to a certain extent addressed in the project document’s component 2. However, the details on choice of technology are very scarce. E.g. there is no elaboration of whether electricity will be produced via direct waste incineration or methane extraction and combustion, thus it is not possible to comment on the technical feasibility of the project. It is mentioned that Algeria lacks feed-in tariff for waste-to-electricity. The terms for a PPA, costs for lines/transformers, connection fees, who will be the off-taker etc. is not addressed. This part of the project needs further study.
- UNDP has previous experience in this field in Algeria and seems to have allied itself with relevant actors both private and public.
- However, the private sector’s role seems unclear. It is stated that 80 % of the capital will come from the private sector. However, SOPT (subsidiary of Divindus) is described as a parastatal company, and the pledge seems to come from the Algerian government (MIM, MERE). It is referred to an MoU between Divindus and a consortium of Canadian companies, however no details are presented. In Table C presenting indicative sources of financing the private sector contribution (USD 38 mill) is simply listed with “SOPT and foreign investor”. The sourcing of private funds into the project should be clarified.
- Are there possibly too many stakeholders involved in this project which may slow down implementation?
- The issue of sustainability in terms of post-project existence should be better articulated in the program document.

✓ **Japan’s Comments**

- To tackle the problems on waste management in Africa, the Ministry of the Environment, Japan, cooperating with Japan International Cooperation Agency (JICA), the United Nations Environment Programme (UNEP), the United Nations Human Settlements Programme (UN-HABITAT) and cities inaugurated “African Clean Cities Platform (ACCP)” in April 2017.
- This Platform, as a basis for the support for implementing measures for achieving sound waste management and SDGs in Africa, is functioning to share

the knowledge and experience of African countries on municipal waste management and improve the capacity of people and organizations. Currently 35 African countries are participating in the Platform.

- GEF, the Government of the People's Democratic Republic of Algeria, and stakeholders are highly expected to make the most of the Platform and share the knowledge of the project.

✓ **United States Comments**

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- The private sector investment in waste infrastructure are key components to this project's success. Have all of the private sector entities who will be participating in this project been chosen?
- Will there be a tendering process to decide who wins some of the contracts that are likely to result from the technical assistance provided by this project?
- Please note on slide/page 14/44 of the 10080\_PIF.pdf there is an error.
  - It reads "The Ministry of Energy, which has targeted a total of 20,000 MW of renewable energy...." The correct amount is 22,000 MW
- Page 14/44 mentions a public private partnership – these have had success in Algeria, but the concept itself is still somewhat sensitive depending on the audience. They mention the MOU was signed April 2018 – would be interested to hear what's happened since then.
- What are the highlights present in several areas for? Has the project team talked to the CREG (Commission de la regulation de l'electricite et du gaz)? Typically this organization would write the cahier des charges (specifications book) determining whether a power plant can be connected to the grid. (Page 14/44 say "it has confirmed this proposal will be eligible to make an unsolicited bid" – confirmed by whom?)
- Page 16/44 – Can they clarify how ANSEJ and CNAC will be involved? What role will they play?
- Page 16/44 – They picked Constantine and Setif – which other cities were considered? Might be helpful to see a bit more about why these two cities were chosen.
- Page 32/44 – what does "roles specific to women will be created," mean? It seems to imply certain work is more suited to women, is that what it is meant to imply? What does this mean in concrete terms?
- Is there more detail provided about how the budget will be spent?

**10. Chile: Accelerating investment in efficient and renewable district energy systems in Chile (UNEP) (GEF Project Financing: \$2,141,781) GEF ID = 10087**

✓ *No comments were received for this project*

**11. Turkey: Promoting Low Cost Energy Efficient Wooden Buildings in Turkey (UNDP) (GEF Project Financing: \$3,800,000) GEF ID = 10090**

✓ **United States Comments**

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Please confirm that the project will not promote or expand industrial scale logging in primary forests.

**12. Ukraine: Sustainable Bioenergy Value Chain Innovations (EBRD) (GEF Project Financing: \$4,800,000) GEF ID = 10110**

✓ **Canada's Comments**

- The project is targeting a less developed type of renewable energy generation - power and heat generation using biomass. Due to a “green tariffs” policy and appropriate regulatory environment, wind and solar energy generation in Ukraine received a strong impetus for fast growth. Meanwhile, in spite of very high potential for biomass energy sector growth in Ukraine, it remains underdeveloped, and less than 10% of the available agricultural residues and waste are used for heat and power generation.
- It looks like the project may play the role of trigger in this area and accelerate the development of the bioenergy sector. The project goal and objectives are in line with national policy defined and approved in the key legal strategic documents in the field of energy safety (Energy Strategy of Ukraine until 2035, National Action Plan for Renewable Energy for the period till 2020, Strategy for Sustainable Development "Ukraine-2020"), climate change mitigation / adaptation (Strategy of the Low Carbon Development of Ukraine until 2050), environmental protection (Draft Law of Ukraine on the Fundamentals (Strategy) of Environmental Policy of Ukraine up to 2030, submitted to Parliament, under consideration).
- The project is in compliance as well with provision of the Association Agreement with the EU obligating Ukraine to increase energy efficiency.
- The project is focused on meeting local needs. The current process of decentralization and administrative reform in Ukraine resulted in the establishment of new Amalgamated Territorial Communities (ATC). All the

documents included energy / climate change section with focus on the use of local renewable energy sources (priority – local biomass). It means that the proposed project is complementary to renewable energy initiatives and will promote bioenergy technologies and practices at local level, which is very sensitive to such innovations.

- The project takes into account approaches and outcomes of other projects supported by IFIs and/or international intergovernmental organizations, and develops new initiatives and interventions based on best practice and achievements.
- We hope that the Project, being approved, will pay attention and take into account as well results (in particular, best practices etc.) of other completed or on-going projects either focused on local specifics or having national-wide approaches. In particular, I found important and useful outcomes of the Horizon 2020 project Bioenergy4Business, which as well promoted substitution of fossil fuels used for heating with available bioenergy sources in Ukraine and EU countries (the project completed recently).
- The project is addressing country specific needs. In particular, introducing standards concerning quality of bioenergy products and establishing the Biomass certification system will be important steps forward in the expansion of Bioenergy in Ukraine. The proposed approach (combination of technical assistance with investments in the form of loans) seems realistic, practical and productive.
- The list of sites where the project interventions will take place is quite comprehensive; however, it represents almost all natural zones of Ukraine (steppe, different types of woodland). Only the mountain forest zone is missing. The territory of the Carpathian and Transcarpathian regions is mainly covered with forests and represents an area with a rather specific type of biomass and traditional heat / power generation. It looks like there is a reason to include Project site(s) from this region; it may help to take into account mountain specifics in the elaboration of Bioenergy Value Chain schemes.
- It is difficult to understand the value of 1% in the phrase presented on the page 10 (The largest share of Ukraine's total GHG emissions is attributed to energy-related emissions which account for 66% (or 210 MtCO<sub>2</sub>), while electricity and heat generation represents 43% (or 90 MtCO<sub>2</sub>) of GHG emissions from fuel combustion).
- The project is in line with and supports the implementation of the national policy in the field of energy and environment and addresses important needs in the development of national energy sector.
- The project takes into account and further develops the achievements of other technical assistance projects and create new important value for energy sector of Ukraine.
- The project addresses real country needs and proposes a promising complex approach in promoting Bioenergy in Ukraine (strengthening regulation and

certification system in the field, capacity building, introduction of best available technologies and practices, elaboration and implementation of bioenergy value chain investment projects, etc.).

✓ **United States Comments**

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Do GEF staff expect any of the interventions will be Category A?

**13. Colombia: Colombia's 2030 MRV Strategic Vision (UNDP) (GEF Project Financing: \$3,791,550) GEF ID = 10121**

✓ **Norwegian-Danish's Comments**

- Regarding the project “Colombia’s 2030 MRV Strategic Vision”, we would like to ask UNDP to ensure coordination with other relevant programs such as UN-REDD and its support to MRV-activities.
- The program document should clarify what is meant by the 500,000 USD “in-kind” co-financing from UK, Norway and Germany
- We are pleased to see that gender is addressed specifically and activities identified for follow-up

## INTERNATIONAL WATERS

**14. Regional (Costa Rica, Ecuador, El Salvador, Guatemala, Honduras, Mexico, Panama): Towards Joint Integrated, Ecosystem-based Management of the Pacific Central American Coastal Large Marine Ecosystem (PACA) (UNDP) (GEF Project Financing: \$6,877,626) GEF ID = 10076**

✓ **France's Comments**

- The French chair wishes to highlight the existence of a regional initiative for the conservation of biodiversity and the sustainable use of marine and coastal resources. The CMAR project "Eastern Tropical Pacific Marine Corridor" establishes an appropriate regional framework facilitating the development and integral management of the corresponding marine corridor, consistent with the policies, legislation and related agreements of the four member countries of this initiative (Costa Rica, Panama, Colombia and Ecuador), in accordance with the relevant international conventions and agreements. Synergies must be developed between these two projects that pursue similar objectives.

✓ Canada's Comments

- This initiative is definitely relevant for Central America and Guatemala in particular, especially on the Atlantic coast.
- Waste from all over Guatemala is currently entering Guatemalan rivers and being transported to the Atlantic coast where kilometers of garbage can be found clogging up the coast line. Much of this garbage is entering into the Honduran coastline and has caused tensions between the two countries.
- The problem is further impacted by the effects of climate change. Heavy rains and tropical storms wash even more garbage into Guatemalan rivers and out to the oceans.
- The Guatemalan government has begun to take actions to address the problem but requires both technical and financial assistance.
- Marine life and biodiversity along the coastline is negatively affected.
- The Project Identification Form (PIF) makes no mention of how this project will contribute to the achievement of the Aichi Biodiversity targets or its alignment with the Sustainable Development Goals. This is an area where additional consideration or information might be beneficial especially as the PIF does note that the project is consistent with the national biodiversity strategies of the participating countries.

✓ United States Comments

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Could the agency explain why specific linkages to and roles of the 14 indigenous peoples who will be engaged in the project preparation will not be identified until the PPG stage? This seems at odds with the statement that they will be included in the project preparation.

**15. Regional (Kazakhstan, Tajikistan, Turkmenistan): Strengthening the Resilience of Central Asian Countries by Enabling Regional Cooperation to Assess High Altitude Glaciation Systems to Develop Integrated Methods for Sustainable Development and Adaptation to Climate Change (UNDP) (GEF Project Financing: \$6,192,694) GEF ID = 10077**

✓ Canada's Comments

- The Project Identification Form (PIF) makes no mention of how this project will contribute to the achievement of the Aichi Biodiversity targets. This is an area where additional consideration or information might be beneficial especially as the PIF does note that the project is consistent with the national biodiversity

strategies of the participating countries.

✓ **United States Comments**

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- We are concerned about a lack of substance in terms of fleshing out this program's activities – and as such, wonder whether the “potential results” are realistic?
- In a project to study the glacial systems of the Tien Shen and Pamir Mountains, why are Uzbekistan and the Kyrgyz Republic not included?
- Can GEF provide more clarity on the two-thirds of the funding that is coming from in-kind contributions from partners? We note that “Investment Mobilized” will be clarified during the PPG phase – how confident is GEF that the partner funds will materialize (and are there any updates to this)?

**16. Regional (Burundi, Kenya, Rwanda, Tanzania, Uganda): Lake Victoria Environmental Management Programme Phase 3 (World Bank) (GEF Project Financing: \$9,132,420) GEF ID = 10116**

✓ **France's Comments**

- The LVEMP III project presented to the GEF by the World Bank is part of a context of ongoing serious degradation of the water quality of Lake Victoria, through eutrophication, particularly in confined bays where large cities discharge their domestic effluents little, badly or not treated. This aggravates a broader problem of nitrogen and phosphorus pollution in the watershed, by fertilizers but also by erosion (a lot of phosphorus in mineral form is drained or transported by the winds).
- In this context, the project encourages efforts to monitor and manage lake water quality and watershed protection.
- It constitutes Phase 3 of a structuring project at the local level to reduce environmental impacts and improve cross-border collective management of natural resources.
- The French chair wishes to mention the existence of other projects with which the project financed by the GEF should be articulated:
  - the projects financed by AFD and the EIB under the "LVWATSAN" initiative, with EU contribution, to upgrade drinking water and sanitation infrastructures. In Uganda, the new Katosi treatment plant near Kampala takes into account these difficulties in its design and provides for a flotation treatment system. Other technologies are developed to respond to this type of situation (ozonation and activated carbon filtration). The same applies to wastewater: the treatments must be chosen to eliminate

most of the nitrates, but especially the phosphates against which the existing systems are not always effective, and especially of a very insufficient capacity compared to the pollution load of the domestic effluents.

- the "Wasaf" project financed by the FFEM on the monitoring and sustainable management of surface water resources in 3 African countries ("Water sources in Africa") including Uganda. This project provides monitoring and a better understanding of cyanobacterial efflorescence, particularly in Murchison Bay and the Gulf of Napoleon, by mobilizing specialists from French and regional research organizations. It could usefully feed into component 1 of the project presented to the GEF on improving the knowledge of the water quality of the lake. This would turn scientific information into more concrete action to combat the pollution of Lake Victoria's waters.
- Key Ugandan actors (NWSC, KCCA, Uganda Ministry of Water and Environment) are common beneficiaries or interlocutors for these projects.

✓ *Canada's Comments*

- The project is in line with national priorities of the Lake Victoria Basin countries (Kenya, Uganda, Rwanda, Tanzania and Burundi). The countries involved formed the Lake Victoria Development Programme ("LVDP"), a mechanism established in to coordinate various interventions in the Lake Victoria Basin region.
- The stakeholder consultations already undertaken by the project should have the project activities aligned with other initiatives in place in the Lake Victoria basin region.
- The key challenge of competition for transboundary natural resources has been mentioned in the project document and should be taken into account throughout the project.
- The Project Identification Form (PIF) makes no mention of how it will contribute to the achievement of Aichi Biodiversity targets or its alignment with the Sustainable Development Goals. This is an area where additional consideration or information might be beneficial.
- In addition, the PIF does not provide any input on sections on Risks (Indicate risks, including climate change, potential social and environmental risks that might prevent the Project objectives from being achieved, and, if possible, propose measures that address these risks to be further developed during the Project design (table format acceptable), consistency with National reporting (Indicate if this Project is consistent with the National Strategies and plans or reports and assessments under relevant conventions) and knowledge management (Outline the Knowledge management approach for the Project, including, if any, plans for the Project to learn from other relevant Projects and initiatives, to assess and document in a user-friendly form, and share these experiences and expertise with relevant stakeholders). These are areas where

additional consideration or information might be beneficial especially since component 4 of listed outputs for the project deal with project coordination and knowledge management.

## MULTI FOCAL AREA

### **17. Uruguay: Consolidating biodiversity and land conservation policies and actions as pillars of sustainable development (UNDP) (GEF Project Financing: \$2,639,269) GEF ID = 10081**

#### ✓ United States Comments

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- A key feature of the project activities centers on advancing pilot sustainable production systems to combat land degradation on private livestock production lands, yet the PIF suggests that ‘land degradation in Uruguay is mainly due to intense rainfall’, which seems an incomplete explanation of the issue. Could the agency clarify their understanding of the drivers of land degradation in this system, so that Council members can adequately understand how the proposed activities plan on reversing or mitigating those drivers.

### **18. Sudan: Sustainable Natural Resources Management Project -AF\*(World Bank) (GEF Project Financing: \$1,369,863) GEF ID = 10083**

#### ✓ Canada's Comments

- Sudan is experiencing severe economic hardship exacerbated by climate-related shocks such as drought. This project builds on previous work and directly addresses climate vulnerability at the community level.
- The project would align well with the work of international NGOs and some UN agencies like WFP.
- This type of work is highly relevant for Sudan and we endorse this work.

#### ✓ Germany's Comments

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

Germany welcomes the proposal, which aims to reduce environmental degradation and vulnerability of rural poor and marginalized people vis-à-vis climate change in Gedarif and Khartoum through the adoption of sustainable land and water management practices in targeted landscapes. Germany welcomes that the activities for which

additional funding is requested, are fully consistent with the Sudan National Action Plan and its Disaster Risk Management Strategy. The project advances the objectives of Sudan's INDC and NAPA. However, Germany requests that several requirements are taken into account during the design of the final project proposal.

Requirements to be taken into account during the design of the final project proposal:

- The **PIF is not complete**, i.e. particularly Part II, chapter 1a) Project Justification is missing. Germany used for its evaluation additional documents provided by the GEF, including “Combined Project Information Document/Integrated Safeguards Data Sheet (PID/ISDS)”. However, there are **major differences between the combined PID/ISDS and PIF** regarding the names and sub-components / activities of the four project components, particularly for components 1 and 3. Germany therefore requests that these **discrepancies be resolved and that a more complete PIF is provided**.
- The PIF contains only very general information about the way **stakeholders will be involved** in the project and how to ensure that implementation at the local level is **inclusive and builds local ownership**. There is also very little information about how **gender dimensions considerations** will be included in the project design. Germany would highly welcome further information on all three matters, including reference to lessons learned from previous and ongoing phases of the project.
- Germany suggests that the project proposal could be strengthened by **providing additional information on climate change specific dimensions** such as vulnerability of people and natural resources to climate change or on the additionality of the project in terms of climate change adaptation benefits. This would strengthen the climate adaptation justification.

Comments based on information provided in the “Combined Project Information Document/Integrated Safeguards Data Sheet (PID/ISDS)”:

- **Component 1** is meant to “build on the Great Green Wall investments in Sudan and neighboring countries, under the framework of the Sahel and West Africa Program (SAWAP) as well as other, relevant initiatives, to **expand highly successful investments to two additional states**, including Gedarif and Khartoum.” Several measures are referred to, incl. establishment of demonstration farms, support for land use management and zoning plan processes, etc. Considering limited resources requested for this component (USD 700.000), Germany would welcome a more **detailed description of specific measures** to be implemented under this component and how they will make use of lessons learned and resources from ongoing activities under SAWAP as well as other relevant initiatives.
- Moreover, component 1 will complement development partner-led interventions, including from FAO in North Darfur. Germany would welcome further information on **potential overlaps and how duplication of activities** can be avoided.
- Very little information is available on foreseen measures under **component 3**.

Germany would strongly suggest expanding the description of this component.

✓ **United Kingdom Comments**

*Comments from the United Kingdom were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.*

- The UK feels more work is needed on the project document. It uses traditional technical approaches, innovations are minimal and sustainability improbable

Summary of key points:

- The project approach is essentially traditional. It is exclusively about technical/physical change and should also look at addressing institutional issues to support sustainability objectives of the programme.
- There has been no independent (mid-term) evaluation for the project to provide additional evidence to underpin to programme design and approach.
- There has been limited sharing of information and engagement with other stakeholders in Sudan.
- Khartoum State as the choice for the poorest and most vulnerable is questionable. It targets those classified as very poor.
- It frequently refers to “innovation” whereas the project applies approaches that have generally been proved to be ineffective. Example: tree planting in FNC forest reserves and paying for forest guards during the project cycle.
- The GoS is committed to scaling up project activities”, the question is whether GoS will allocate their own resources to support or will it be solely dependent on WB project funding.
- Principal among the new/additional project activities proposed are water extracting measures for crop production without any reference to water resources management. Without taking on board the water resources available and the catchment use of water it is impossible to make any programme sustainable in the long term, especially in areas outside the Nile Basin. There is a strong encouragement to include an Integrated Water Resource Management approach or work with partner in country implementing IWRM (Eg UKaid programme in Gadaref)
- The ToC needs to be reviewed: nomadic tribes/traditional people..... pressures caused by these people on scarce natural resources p.7). We do not agree with assessment of the situation in country. In Gedaref for instance, the pressure of unsustainable land use is primarily from ‘investors’ as many millions of hectares have been expropriated from local land users and then used in often unsustainable ways (‘shifting cultivation with tractors’).
- Baseline co-financing context: The proposed project as designed will leverage and complement projects....., the European Union-funded project “Natural

Resources Management for Sustainable Livelihoods – East Darfur State” etc. This is a UNEP implemented project and they are not aware of anything of the kind. East Darfur is geographically different from the intended project locations in the East and centre of Sudan, therefore not a comparable evidence base to use.

- There have been previous efforts to exchange information with SSNRMP and other key NRM projects in the context of joint lessons learning. We would encourage the WB to use this project as an opportunity to build/ support coordination and information sharing efforts in country.
- Institutional and policy reform.... developing effective inter-agency collaboration mechanisms. What the project has done to achieve this since 2014 is not clear nor is how is it linking into existing coordination mechanisms.

#### Potential Linkages and Synergies:

This programme has the potential to foster more catalytic impacts through better coordination with other relevant programmes in Sudan. UK is keen to engage and link up its programmes with the WB to strengthen this proposal to draw out lessons, best practice, data etc. These include:

- A. provide FNC (state and federal level managers), WB management & project senior staff with good practice experience so that innovations get a better chance - through the Network, written 'guidelines', major partner projects that provide inspiration, incl. field level exchange.
- B. tailor-made interaction: UNEP are willing to support their project sites on the one hand to verify and adjust good practice recommendations and identify what blocks application (mostly institutional, not technical).
- C. Khartoum based influencing supporting WB missions in country and with updates when not; example at present of an IFAD 'natural resources governance project' identification mission for 67M\$, and the IFAD country plan, COSOP
- D. Indirectly and on the longer term, the institutional reform support will put innovative Sudanese senior staff in a stronger/more senior position, speak out and influence (more sustainability beyond ADAPT influencing). Think about the senior FNC women, for instance.

#### **19. Global: GEF SGP 7th Operational Phase – Core (Part 1) (UNDJP) (GEF Project Financing: \$61,538,462) GEF ID = 10084**

##### ✓ United States Comments

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Which specific countries will this project be operating in and what activities? Might any mandate countries be affected (especially those subject to the Trafficking in Persons mandate)?

**20. Egypt: Green Sharm El Sheikh (UNDP) (GEF Project Financing: \$6,212,694) GEF ID = 10117**

✓ *Japan's Comments*

- To tackle problems on waste management in Africa, the Ministry of the Environment, Japan, cooperating with Japan International Cooperation Agency (JICA), the United Nations Environment Programme (UNEP), the United Nations Human Settlements Programme (UN-HABITAT) and cities inaugurated "African Clean Cities Platform (ACCP)" in April 2017.
- This Platform, as a basis for the support for implementing measures for achieving sound waste management and SDGs in Africa, is functioning to share the knowledge and experience of African countries on municipal waste management and improve the capacity of people and organizations. Currently 35 African countries are participating in the Platform.
- GEF, the Government of the Arab Republic of Egypt, and stakeholders are highly expected to make the most of the Platform and share the knowledge of the project.

✓ *Canada's Comments*

- On the political level, this project is in line with Egypt's Strategic Development Strategy (Vision 2030) which was launched at the Egypt Economic Development Conference Sharm El Sheikh, March 2015. The strategy identifies tourism as a key strategic sector for investment and growth. Sharm El Sheikh is renowned for tourism in Egypt, but there are growing threats to environmental degradation due to lack of adequate policy frameworks, lack of finance, and lack of enabling environment.
- This project is well targeted to focus on policies to encourage low-carbon urban development, performance-based financing and incentives, resource efficiency interventions, distributed renewable energy measures, green purchasing scheme, improved waste management and recycling, reinforced planning and management of protected areas (PAs), enhanced PA revenue generation and reinvestment, and decontamination of wastewater facility.
- Given the above, mitigating environmental degradation will therefore support economic growth by facilitating increase in tourist numbers, and will generate additional direct and indirect job opportunities in the new climate change sub-sectors and provide investment opportunities for the private sector who will benefit from increased tourism and climate change activities.
- This project is complementary a series of other initiatives in Egypt that GEF

should be aware of:

- Climate Investment Funds
  - 1) Wind Power Development Project
  - 2) Egypt Kom Ombo CSP
- Green Climate Fund
  - 1) Egypt Renewable Energy Financing Framework: This project has a total investment of \$1.0 billion. It is anticipated that the project will avoid the emission of 18.9 million tonnes of CO<sub>2</sub>e.
  - 2) Enhancing Climate Change Adaptation in the North Coast and Nile Delta Regions in Egypt: This project has a total investment of \$105.2 million. It is anticipated to provide 17.7 beneficiaries with increased resilience.
  - 3) GCF-EBRD Sustainable Energy Financing Facilities: This project has a total investment of \$1.4 billion and will take place across many GCF-eligible countries including Egypt. The project is expected to avoid the emission of 27.5 million tonnes of CO<sub>2</sub>e.
  - 4) Transforming Financial Systems for Climate: This project has a total investment of \$754.9 million and will be implemented across many GCF-eligible countries. The project is anticipated to avoid the emission of 36 million tonnes of CO<sub>2</sub>e.
- G7 African Renewable Energy Initiative to help unlock the renewable energy potential in the region by catalyzing private sector investment in renewable energy in Africa, such as solar, hydro, and wind power
- Building the capacity of all actors along the climate technology supply chain is key in order to address the underserved. The Facility will need to address the economic disempowerment and marginalization of Egyptian women due to systemic and socio-cultural gender-based barriers, which seriously limit women's participation in the climate change sector, waste management and marine and coastal area protection.
- The development of a market for climate change mitigation and the involvement of the private sector are likely to remain limited and non-sustainable unless targeted by the Facility. Scaling up private sector climate finance is an urgent priority to rapidly put Egypt on a mitigation path to enable vulnerable communities to shift on to a climate resilient pathway. At the same token, T/A support will need to focus on the institutional capacity of relevant public sector institutions for the uptake of climate change measures and for necessary policies to improve the eco-system.
- The GEF work program neither mentions monitoring and evaluation nor conducting evaluations. It will be important to inquire about the M&E system for the Facility. Is there a single overarching macro-economic framework per se for GEF or are GEF results organized using a project portfolio approach

composed of results frameworks for each “focal” area of work against which each project in that focal area has to report to? Also it will be important to ensure the work program includes provisions for an independent mid-term review and final evaluation per country to avoid broad based, generalized results aggregation and to measure value for money, efficiency and effectiveness, as well as to measure the inclusion of women and marginalized groups.

- The Facility will contribute to achieving a paradigm shift by creating new and significantly scaling up existing markets for commercial sustainable energy, energy efficiency and climate change resilience financing/activities.
- The CBD COP-14 Decision on Agenda Item 14 (Cooperation with other conventions, international organizations and initiatives) welcomed the initiative of the Government of Egypt to promote a coherent approach for addressing biodiversity loss, climate change and land and ecosystem degradation.

✓ *Switzerland’s Comments*

- Overall, we support the multi-sectoral approach
- We welcome the ambitious ratio between GEF grant and investment mobilized
- We note the relative modest co-financing by the private sector (USD 3 million out of a total of USD 66 million). Considering that Sharm El Sheikh is one of the prime tourist destination in Egypt, with a number of high end resorts and a solid revenue stream, one would expect that the private sector assumes a greater role, including in financing. Considering that many of the envisaged results will directly benefit the tourism industry, we wonder if all the means to mobilize more co-financing by the private sector have been explored.
- We welcome the envisaged benefits to biodiversity, but did not find detailed information on how the Green Sharm El Sheikh Initiative will guarantee the long-term protection of critical ecosystems in the area in the light of the likely further touristic developments, including construction of infrastructure, increasing number of visitors, and recreational activities, such as diving, boating, fishing, etc.
- The PIF states: 3.2 PA financing increased through further-enhanced PA revenue generation and reinvestment by the public and private sector in Sharm El Sheikh into the tourism natural capital base. Could you please elaborate what this encompasses
- Branding and marketing green tourism: The PIF states i.a. that “The project will therefore also develop a new strategy for branding and marketing green tourism in Sharm El Sheikh and secure its endorsement by relevant public and private stakeholders.” In my personal experience with tourism projects (not in that region), the tourism industry is swift when it comes to green branding and marketing. How does the project assure that the branding and marketing will only come once the project shows its first environment positive results. We don’t want GEF funding to go towards premature communication and

marketing – because of the issue per se and to avoid reputational risks.

✓ **United States Comments**

Comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Can staff elaborate on why it makes sense to support *high-end* hotels to implement low carbon operations, and what UNDP would be doing, exactly?
- Are there activities in this project that look high risk from an environmental perspective?