



**Global Environment Facility**

September 14, 2005

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**COMPILATION OF TECHNICAL COMMENTS  
SUBMITTED BY COUNCIL MEMBERS  
ON INTERSESSIONAL WORK PROGRAM  
APPROVED IN SEPTEMBER 2005**

NOTE: This document is a compilation of technical comments submitted to the Secretariat by Council members concerning the project proposals presented in the Intersessional Work Program approved by the Council in September 2005.

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## **General Comments**

### ***COMMENTS FROM USA***

There are also two general issues I would like to raise:

First as the US has indicated since September 2004, the treatment of cost-effectiveness, which is a central principle in the GEF Instrument, is of increasing importance in my government's review of the effectiveness of U.S. budget programs. While several projects in this work program have adequately addressed this issue (for example, the Indonesia Micro-hydro project and the Bhutan Sustainable Land Management project), the treatment of cost effectiveness continues to be uneven. Many GEF projects still confuse cost-effectiveness with financial leveraging. The fact that GEF funds leverage other funds does not mean that the project is cost-effective. Rather, cost-effectiveness can be demonstrated by comparing indicators on unit costs, describing how the project is more efficient in achieving results than previous efforts, indicating how the project aims to increase efficiencies over time, or perhaps noting that project implementation will use open and internationally competitive procurement practices. Therefore, we would remind agencies that, beginning with the November 2005 work program, the US reserves the right to object to any project that does not contain a satisfactory justification of cost-effectiveness.

In addition, as the US indicated at the June 2005 Council meeting, we do not believe that the UN Environment Program has the requisite fiduciary framework, project-at-risk systems that detect and correct problems in a timely manner, and effective and independent evaluation capabilities to undertake investment projects or projects involving the use of financial instruments such as guarantees or special funds. (In our view, the World Bank and the regional development banks currently have all of these capabilities to varying degrees.) The GEF Instrument clearly did not envision UNEP (or UNDP for that matter) engaging in these operations; nor did it envision bilateral or private financial institutions serving this key accountability function. Therefore, the US reserves the right to call for a vote on any of these types of operations put forward by UNEP as the sole Implementing Agency. We would also appreciate greater information from UNDP on its capabilities in these areas.

We appreciate the hard work that went into preparing this work program and look forward to discussing the issues that we have raised at the next Council meeting.

## **BIOLOGICAL DIVERSITY**

### **Regional (Benin, Burkina Faso, Niger): Enhancing the Effectiveness and Catalyzing the Sustainability of the W-Arly-Pendjari (WAP) Protected Area System [UNDP]**

#### ***COMMENTS FROM GERMANY***

##### **General Comments**

1. The proposal is logic and complete. However, within the same area (Pendjari and WW-Benin) GEF was already active in cooperation with the World Bank. Despite evaluations that have been undertaken, “lessons learnt” of this project are not incorporated into the proposal.

##### **Specific Comments**

2. Earlier efforts in the terminated project to match the expenses with monetary income have not managed to close the financial gap. Consequently, the issue of financial sustainability is the main concern that needs to be addressed. The sources of income in the current project seem even more limited (less tourism and game hunting opportunities). Therefore a long term financing scheme (e.g., a trust fund) has to be established.

3. The scheme should be part of an overall business plan for the project. These annual business plans should also be evaluated annually to assure a transparent management.

4. Co-management processes should be addressed more prominently in the proposal, as they are directly linked to the questions of good governance and to the newly emerging communities in the decentralisation process.

##### **Recommendation**

5. Germany supports the proposal. The above raised concerns should be addressed during further planning and implementation.

**Belarus: Catalyzing Sustainability of the Wetland Protected Areas System in Belarusian Polesie through Increased Management Efficiency and Realigned Land Use Practices [UNDP]**

***COMMENTS FROM GERMANY***

**General Comments**

6. The objective of the Belarus Project is to improve the management of the Wetland Protected Areas System in Belarusian Polesie and to integrate biodiversity conservation objectives into the key economic activities – agriculture, forestry and flood defence.

**Specific Comments**

7. Considering the importance of establishing management plans for the selected reserves and the problems involved in the sustainable financing of their implementation, including ecotourism and private sector participation, we recommend to take into account concepts and experiences accumulated by the Conservation Finance Alliance, thereby expanding traditional management plans towards business plans.

**Recommendation**

8. Germany supports the proposal. The above raised concerns should be addressed during further planning and implementation.

***COMMENTS FROM USA (August 25, 2005)***

9. The project has strong and clear results measurement framework and seems well thought out and focused. We had a few quick questions:

- (a) Are non-governmental groups involved in this project?
- (b) Is any resettlement required or expected? If so, have affected people been consulted and is there a resettlement plan?

***COMMENTS FROM USA (September 9, 2005)***

10. The *Belarus Catalyzing Sustainability of Wetland Protected Area System* project has strong and clear result of measurement framework and seems well thought out and focused. However, we are concerned about the potential adverse impact that the project- might have on those currently inhabiting one of the project areas, and want to ensure that their concerns are

taken into account as the project is further developed. Therefore, the US requests that this project be recirculated to the Council prior to CEO endorsement so that the Council can review the detailed stakeholder involvement plan, and requests that UNDP provide further information on the impact of the project on people living in the Mid-Pripyat reserve.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/13)**

**Botswana: Building Local Capacity for Conservation and Sustainable Use of Biodiversity  
in the Okavango Delta [UNDP]**

***COMMENTS FROM GERMANY***

11. Germany supports the proposal.



**Croatia: Conservation and Sustainable Use of Biodiversity in the Dalmatian Coast through Greening Coastal Development [UNDP]**

***COMMENTS FROM GERMANY***

**General comments**

12. In general, most of the results intended in the three sectors lack realism. The proposed measures and outcomes give the impression of a random compilation of ideas under the umbrella of biodiversity conservation. It is also questionable if the project within the Ministry of Planning has the mandate or legal back-up concerning interventions in the tourist, fisheries and agriculture sector, in particular, if land tenure matters are concerned. Further, the proposal only mentions favourable national policies and commitments by stakeholders but neglects the respective legal framework of the sectors which are for example necessary to relocate cage culture operators, enforce regulations or reprimand non-compliance with biodiversity related regulations.

*Finances*

13. It is highly questionable if the share of co-financing (75% of the budget--which is often based on verbal commitments, see footnote page 13) is realistic.

**Recommendation**

14. For the above mentioned reasons we ask for recirculation of the project proposal to the Council for a second review prior to CEO endorsement.

***COMMENTS FROM USA (August 25, 2005)***

15. This is definitely an important area for GEF support, and the project seems well thought through and quite ambitious in scope. However, the project summary documentation raised the number of questions that we weren't able to find answers to in the summary document and a quick glance at the project document.

- (a) Please describe the EU accession requirements relevant to the project and the basis for the apparent incremental cost baseline assumption that Croatia will not meet its obligations. Isn't baseline supposed to be what the government is planning to do, in this case adhere to EU accession obligations?
- (b) What are the reforms in the banking system referred to on p.20? Are they required for project success? Are they in place now? If not, what is timing and likelihood?

- (c) The document seems to suggest that you creating a separate small grants program for Croatia. Why aren't you using the GEF's existing small grant program for this purpose?
- (d) What are the terms of the partial-risk guarantees? What type of fund or instrument is backing up the guarantees? Is GEF money any part of that? What happens to the funds if the guarantees are not needed? Will they be returned to the GEF?
- (e) The cofinancing commitments seem somewhat vague, especially private-sector. So do some of the monitoring and evaluation targets and plans, especially for the biodiversity indicator. Under the M&E terms of reference, targets and plans should be ready at the time of Council approval not at CEO endorsement and baselines should be done in 1<sup>st</sup> year.
- (f) We are not convinced of sustainability (document seemed to argue that there are no reasons to believe otherwise, which is not compelling). The project appear to assume that it can put in place an incentive structure (presumably requiring budgetary support) and catalyze a fundamental cultural change toward biodiversity, both of which are fundamentally difficult objectives. For example, if market incentives are required after the project, how much will this be funded? If partial risk guarantees are still required for companies to set up environmentally friendly businesses, who will assume the risk?

***COMMENTS FROM USA (September 9, 2005)***

16. Although the *Croatia Conservation and Sustainable Use of Biodiversity in the Dalmatian Coast* project is clearly directed at an important area, the project document raised a number of issues that were not resolved satisfactorily by UNDP's response to our questions. For example, the incremental cost calculation does not appear to give sufficient weight in the baseline of the actions that Croatia will take as part of its EU accession requirements. The terms of the proposed partial risk guarantee have not yet been negotiated; since there is not a GEF policy on these instruments, it is unclear whether the terms will be acceptable. There is insufficient justification for the proposed creation of a separate small grants program instead of using the existing GEF-wide small grants program. It is not clear that the proposed banking reforms have been reviewed in the context of the safety and soundness of the overall banking system. Key indicators for monitoring and evaluation have yet to be selected, and the cofinancing commitments seem somewhat vague. Therefore, the US requests that the Croatia project be postponed until the November Council meeting in order to discuss these issues.

**El Salvador: Protected Areas Consolidation and Administration [WORLD BANK]**

***COMMENTS FROM GERMANY***

**General Comments**

17. The objective of the Project is to conserve El Salvador's globally significant biodiversity by strengthening the national protected areas system and consolidating two priority protected areas.

18. There are no ongoing German cooperation activities in the context of biodiversity and protected area management in El Salvador. Due to the intensive work in the areas of co-management with municipalities and local land-use planning it might be worthwhile for this project to also consider the experiences of two GTZ-Projects in El Salvador:

- (a) Advisory services to communal development and decentralization (PROMUDE-GTZ); and
- (b) Participatory spatial planning in the La Paz region.

**Specific Comments**

19. Considering the importance of establishing management plans for the selected reserves and the problems involved in the sustainable financing of their implementation (identified as a major problem in the lessons learned from other reserves in El Salvador), including ecotourism and private sector participation, we recommend to take into account concepts and experiences accumulated by the Conservation Finance Alliance (<http://www.conservationfinance.org/>), thereby expanding traditional management plans towards business plans.

**Recommendation**

20. Germany supports the proposal. The above raised concerns should be addressed during further planning and implementation.

***COMMENTS FROM USA (August 25, 2005)***

21. This appears to be a fairly solid project, but we have a few questions and comments, and one serious concern about fiduciary matters:

- (a) The project states that project execution and all fiduciary matters will be handled by the Ministry of Environment and Natural Resources (MARN), and we would

like more information to determine whether this is appropriate. We are assured in a footnote that arrangements for ensuring adequate fiduciary capacity would be established within the Ministry during the first year of project execution, and that this would benefit a future environmental services project. What capacity does MARN lack, and will its shortcomings be fixed before disbursement of funds? What is the risk of diversion of GEF resources?

- (b) Why have national protected areas not been effectively protected in the past? How are the causes of those failures being overcome in this project? What is the project doing to ensure that staff hired under this project can be maintained on the government payroll?
- (c) Land tenure issues are particularly important for this project, and are quite difficult in El Salvador. We would strongly recommend that the issue of resolving land tenure challenges receive special attention as you further develop the project.

**India: Mainstreaming Conservation and Sustainable Use of Medicinal Plant Diversity in Three Indian States [UNDP]**

***COMMENTS FROM GERMANY***

**General Comments**

22. The project aims at the establishment of *in situ*-conservation areas for medicinal and aromatic plants in three Indian States (Northwest, Northeast und Central India). The project is well justified and involves all relevant stakeholders in India. We welcome the impact orientation of the log-frame and the formulation of the outcome indicators.

**Specific Comments**

23. We wish to raise attention to the fact that two of the States are part of the Hindukush-Himalaya Region. The International Centre for Integrated Mountain Development is working in this geographical region and has ample experience with community-based approaches in natural resource management, including the sustainable management of medicinal and aromatic plants. Especially regarding Outcome 4 on the replication it would be useful to include ICIMOD as a relevant actor, who could contribute to extend the experiences of the project not only to all of the northern Indian States but as well to the neighboring countries.

**Recommendation**

24. Germany supports the proposal. The above raised concerns should be addressed during further planning and implementation.

**Venezuela: Biodiversity Conservation in the Productive Landscape of the Venezuelan Andes [UNDP]**

**COMMENTS FROM GERMANY**

**General Comments**

25. The project is consistent with the GEF procedures.

**Specific comments**

*Financing*

26. From the 7.3 Mio GEF-Support nearly 2 Mio will be used for outcome 4, focusing on the PCM and M&E of the project itself. As the GEF contribution shall cover the incremental costs of the project, we think that the budget needs to be re-adjusted.

*World market for organic and fair trade coffee*

27. Although there is positive evidence for the growth of this niche market, the success of the project not only depends highly upon the stability and growth of this market niche but also on the access of the farmers to the market. The components of the production of other products than shade coffee should be given more importance during project implementation. Therefore, it would be necessary to find local and national markets for all products to diversify the clients to become more independent from one market sector.

28. While higher prices for organic and fair trade coffee are getting less important on the world market, the relevance of aspects such as certified origin and quality of the coffee beans is rising: Other countries in Latin America and Central America are currently addressing this issue, trying to improve the quality of their coffee. We would like to ask the GEF Secretariat and the implementing agencies how the project intends to address these challenges.

29. German Development Cooperation is a member of the “Common Code for the Coffee Community” Initiative (the “4C Initiative”). The objective of this code is to foster sustainability in the mainstream green coffee chain and to increase the quantities of coffee meeting basic sustainability criteria. We therefore propose to initiate an exchange of information and experiences between the project and the “4C Initiative”, in order to avoid a duplication of work and to benefit from the lessons learned.

30. It is not obvious why there should be “only” 600 families with certified coffee production but a total of 10.500 families with an increased annual income and 17.500 families with an additional source of income (see indicators of outcome 1). We would like to ask the GEF Secretariat and the implementing agencies for clarification.

### *Land titles*

31. Most of the small farmers do not have formal land titles, “a fundamental requisite for accessing assistance programmes” (p. 3 of the executive summary). The project outline does not point out clearly how to face these challenges, although this would be an important baseline for the success of the project, especially in terms of sustainability after project end.

### *Incremental cost*

32. The GEF increment will result in “increased livelihood and food security, including demographic stability, among the local population, thereby helping to ensure landscape stability” (11.ii, p. 6 of the executive summary). The demographic stability depends on numerous factors, which will be difficult to calculate and handle within a project like this.

### *Improved living conditions*

33. “Living conditions (for example, access to water and sanitation) will be improved, as a direct result of the increased incomes resulting from the application of biodiversity-friendly activities” (p. 7 of the executive summary). Although the income of numerous farmers’ families is supposed to increase, it is not becoming clear how this can have a direct influence on infrastructure in the region (see also logical framework: last indicators for the objective of the project). Strategies for a more direct influence of the development of this kind of investigations should be developed during project implementation.

### *Environmental Services*

34. The project proposal does not state clearly who will pay for the produced environmental services.

### *Stakeholder participation*

35. The stakeholders should be involved in the monitoring and evaluation of the project itself (outcome 4).

## **Recommendation**

36. Germany supports the proposal. The above raised concerns should be addressed during further steps of planning and implementation.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**CLIMATE CHANGE**

**Armenia: Renewable Energy Project [WORLD BANK]**

***COMMENTS FROM GERMANY***

37. Germany supports the proposal.



**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**Brazil: Second National Communication of Brazil to the UNFCCC [UNDP]**

***COMMENTS FROM GERMANY***

38. Germany supports the proposal.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**Burkina Faso: Transformation of the Rural PV Market (previously Energy Sector Reform) [UNDP]**

***COMMENTS FROM GERMANY***

**General Comments**

39. The implications for the target-group and their involvement in the whole project have not been addressed sufficiently. Water management on the village-side is vital for the sustainability of the programme.

**Specific Comments**

40. The project brief gives only a vague understanding on the involvement of the target groups. We presume that the same type of water management will be applied that is mentioned in PRS I (Programme Régional Solaire I) and PRS II project documents. If this is not intended yet, we request to follow these water management concepts.

41. Due to the fact that little is known about the groundwater table in Burkina Faso we propose to attach a component to this project to support the villagers to reinforce or to start to build small walls:

- Cordonne pierreuses, Height ca. 30 – 40 cm
- Diguettes, Height ca. 50 – 60 cm
- Dignes, Height ca. 60 – 100 cm

42. These small walls stop erosion and support rainwater infiltration and increase the production of agricultural products considerably.

**Recommendation**

43. Germany supports the proposal. The above raised concerns should be addressed during further steps of planning and implementation.

***COMMENTS FROM USA (August 25, 2005)***

44. This project appears to depend critically on government action to eliminate import duties and value added tax on the photovoltaic equipment. How solid is the commitment to do this? Is this action an effectiveness condition of the grant agreement?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/13)**

**Honduras: Rural Infrastructure (Electrification Sector) [WORLD BANK]**

***COMMENTS FROM GERMANY***

45. Germany supports the proposal.

***COMMENTS FROM USA (August 25, 2005)***

46. This seems like a well conceived approach in a challenging environment, and one that is fully supportive of the government's poverty reduction strategy. However, we have a few questions about the investment climate for such projects, and whether this GEF project would negatively affect that climate.

- (a) We have heard reports that nearly 2 dozen private-sector renewable energy projects are stalled because the Ministry of Environment and Natural Resources has not responded to requests from these project sponsors. If these reports are true, what is the reason for this, and what impact it might that have on project success?
- (b) Finally, again, if the reports are true, what impact would this project have on the reportedly stalled private sector ones? For example, would the GEF project displace or compete with the private sector ones?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**Indonesia: Integrated Microhydro Development and Application Program (IMIDAP),  
Part I [UNDP]**

***COMMENTS FROM GERMANY***

**General Comments**

47. Any initiative which is aimed at removing the prevailing barriers to further exploitation of Indonesia's vast micro hydro resources is generally welcomed. The geographical nature of the country, limited fossil fuel resources and a host of other reasons makes such a policy both economically and environmentally attractive.

48. Over the past 15 years a number of initiatives have been implemented in the micro hydro power sector in Indonesia, most importantly the micro and mini hydro projects supported by GTZ under which a range of technologies for rural electrification as well as for grid-connected and captive commercial schemes have been developed and introduced.

49. At present the country is experiencing a noticeable boom in the renewable energy sector, triggered by recent technical and political developments, which have significantly improved the overall climate for renewable energy in the country. Micro hydro power is without question the most attractive of these.

50. The proposed areas of intervention (i.e., finance, technology, community development and productive use of hydro power energy) are fully supported, but the program is deemed to be too complicated in its structure. Based on the experience gained over the past 15 years a more streamlined and pragmatic approach to providing well focused, efficient and genuinely intended inputs is required.

51. The program still talks about demonstration projects. Indonesia already has adequate demonstration projects covering all different technologies (stand alone, grid connection, captive, etc). Demonstration projects are not needed anymore in Indonesia. Customized assistance to motivated and committed project developers is required. For projects to be successful the main requirements are:

- (a) Finance
- (b) Technology
- (c) Institutional
- (d) Policy

52. The concept – to identify and to remove the barriers existing within these areas of intervention in two years and then proceed to the implementation – is over simplistic. In a vast country like Indonesia this approach is too demanding considered to the time span of two years for the first phase. Some institutions have been working addressing these shortfalls for much

longer periods and will continue to do so. Germany therefore would prefer to see an approach whereby the GEF project lends its resources to the on-going initiatives of private sector, NGO's and the GOI which have achieved significant results over the past decade and could continue to do so into the future if properly resourced.

### **Specific Comments**

53. The expectations and demands placed on DGEEU as counterpart organization of the project is very worrying. DGEEU is a very weak organization with extremely limited technical and managerial capacity. Carrying out necessary administrative functions is something they are able to do. Their capacity to be able to manage such a complex project is extremely questionable. The project thus should be streamlined.

54. The issue of productive uses for stand alone micro hydro schemes obviously has a high priority. Development of sustainable end uses for energy utilization requires demanding technical (the type of equipment, hydrology, etc., all must support end use) and socio-economic criteria (skills, tradition, marketing, finance, - elements of SME development). These requirements are effectively a project in itself. While productive end uses can and should be an integral part of MHP projects, the particularities of stand alone MHP projects should be kept in mind. The project proposal raises expectations which in this respect are to be considered unrealistic.

55. The GTZ Mini Hydro Power Project (MHPP) was barely approached regarding input for this program. Considering that the German Technical Cooperation has been working in this sector in Indonesia for the past 15 years, "lessons learnt" of this project should be considered.

### **Recommendation**

56. The success of the project will be on its management. The program is going to require some quite radical streamlining to ensure that a proper focus is achieved and that the intended project partners are deriving benefits from the program. Unless properly steered from the outset the program will risk simply busying itself with politicians, committee's and various other budget consuming events in Jakarta and achieving very little tangible benefits for the really intended beneficiaries.

57. Summarised the following issues have to be addressed:

- (a) From the outset it has to be attempted to streamline the program down to realistic and appropriate areas of intervention.
- (b) On technology issues the focus has to be on private sector participation.
- (c) Significant CO2 emission avoidance can only be realised if the project focuses on grid-connected technologies.
- (d) Prioritized involvement of local banks in finance related components is required in order to achieve financial sustainability, especially with respect to further development in reduction of poverty in rural areas.

58. For the above mentioned reasons we ask for recirculation of the project proposal to the Council for a second review prior to CEO endorsement.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
**(REFERENCE TO GEF/IS/13)**

**Macedonia: Sustainable Energy Program [WORLD BANK]**

***COMMENTS FROM GERMANY***

59. Germany supports the proposal.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**Peru: Rural Electrification [WORLD BANK]**

***COMMENTS FROM GERMANY***

60. Germany supports the proposal.



**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**INTERNATIONAL WATERS**

**Regional (Comoros, Kenya, Madagascar, Mauritius, Mozambique, Seychelles, South Africa, Tanzania): Programme for the Agulhas and Somali Current Large Marine Ecosystems: Agulhas and Somali Current Large Marine Ecosystems Project (ASCLMEs) [UNDP]**

***COMMENTS FROM GERMANY***

**General Comments**

61. The project proposal could be tightened and better structured.

**Specific Comments**

62. No contributions by German Activities are mentioned. However, the project should try to link with the corresponding regional bilateral projects. It has to be made sure that other regional LME projects link to synergize and minimize overlapping activities, maybe through a regional agency that coordinates all LME initiatives.

63. Care should be taken to involve stakeholders who have limited or no access to technological tools such as Internet or television.

64. It has to be secured that the benefits of the project are sustained once the project is completed.

**Recommendation**

65. Germany supports the proposal. The above raised concerns should be addressed during further steps of planning and implementation.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**Regional (Comoros, Kenya, Mauritius, Mozambique, Seychelles, South Africa, Tanzania):  
Southwest Indian Ocean Fisheries Project (SWIOFP) [WORLD BANK]**

***COMMENTS FROM GERMANY***

**Specific Comments**

66. The project proposal needs to better clarify and distinguish the two geographical regions WIO & SWIO.

67. There are no contributions by German Activities mentioned. However the project should try to link with the corresponding regional bilateral projects. It has to elaborate on the linkage of the project with related projects within the Southwest Indian Ocean to synergize and minimize overlapping activities.

68. Since local communities participate in the design of the project as consumers of results of the project, the project proposal should also mention in which way they will benefit from the outcomes of the project and how the anticipated results will be conveyed to them.

**Recommendation**

69. Germany supports the proposal. The above raised concerns should be addressed during further steps of planning and implementation.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**Regional (Comoros, Kenya, Madagascar, Mauritius, Mozambique, Seychelles, South Africa, Tanzania): Western Indian Ocean Marine Highway Development and Coastal and Marine Contamination Prevention Project [WORLD BANK]**

***COMMENTS FROM GERMANY***

**Specific Comments**

70. The type of activities the co-financing is allocated to is not made explicit in the project documents.

71. There are no contributions by German Activities mentioned. However, the project should try to link with the corresponding regional bilateral projects, e.g., the linkage of the project with related projects within the Western Indian Ocean should be elaborated to synergize and minimize overlapping activities.

72. It has to be secured that the benefits of the project are sustained once the project is completed.

73. The countries of the Western Indian Ocean need to develop and agree on the institutional arrangements that will enable them to cooperate in managing a regionwide marine highway.

**Recommendation**

74. Germany supports the proposal. The above raised concerns should be addressed during further steps of planning and implementation.

***COMMENTS FROM USA (August 25, 2005)***

75. Why are so many targets listed as “to be determined”?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
**(REFERENCE TO GEF/IS/13)**

**LAND DEGRADATION**

**Bhutan: Sustainable Land Management [WORLD BANK]**

***COMMENTS FROM GERMANY***

**Specific Comments**

76. Given the importance which is rightly attached to the development of institutional capacities, the required length of implementation should rather be estimated higher than at present.

**Recommendation**

77. Germany supports the proposal. The above raised concern should be addressed during further steps of planning and implementation.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**Nicaragua: Sustainable Land Management in Drought Prone Areas of Nicaragua [UNDP]**

*NO COMMENTS RECEIVED.*

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**Niger: Sustainable Co-Management of the Natural Resources of the Air-Tenere Complex [UNDP]**

***COMMENTS FROM GERMANY***

**General Comments**

78. We welcome the project which is generally in line with OP 15 and support the proposed approach targeting biodiversity and desertification issues at the same time.

**Specific Comments**

79. As decentralization in Niger is at its very beginning, we urge to work on a coherent approach for effective partnership among all stakeholders during the PDF B phase.

80. We share the analysis contained in the project document that the project will take place in an extreme context. Thus we propose to analyze during the PDF B phase what the minimum requirements are for the project to succeed and whether these criteria are met in order to assure success.

81. The German Development Cooperation is implementing a corresponding project within the area. Furthermore a variety of other related programmes and projects exists. In order to avoid duplication of work we ask for coordination of the different activities and collaboration among the different actors.

**Recommendation**

82. Germany supports the proposal. The above raised concerns should be addressed during further steps of planning and implementation.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**MULTI-FOCAL AREAS**

**Regional (Albania, Macedonia): Integrated Ecosystem Management in the Prespa Lakes Basin of Albania, FYR-Macedonia and Greece [UNDP]**

***COMMENTS FROM GERMANY***

**General comments**

83. The proposal is well developed. The profound a.m. technical review identified the main points of concern, and gave necessary inputs for the implementation. The incremental costs are sufficiently explained. The project risks are well identified.

**Specific Comments**

84. Underlining the arguments of the technical review, special attention should be drawn to:

85. The comparatively weak involvement of the Greek side has to be addressed. A strategy to improve the Greek engagement is required.

86. The geo-ecological as well as socio-geographic relationship with the neighbouring regions, in particular the Lake Ohrid area demands a geographic extension, e.g., concept how to integrate the Lake Ohrid region.

87. A market-driven approach for the sustainable development, including innovative techniques of eco-efficiency is needed, e.g., training and awareness building and small grant funds for entrepreneurs.

88. Comprehensive regional marketing approaches for fishery, agro-business, forestry and tourism should be developed. A body for regional marketing should be implemented.

89. Tourism as a potential driving or supporting force for the sustainable use has to be included more explicitly, in form of a concept for the development of an association. There is a need for an exit strategy in case that there is little success for cross border integration (joint development of exit indicators).

90. German Development Cooperation has supported already a wide range of projects in the region. There should be a reference to the measures (capacity building, measures for cross-cultural confidence building, environmental awareness promotion, market development for a sustainable tourism) in the Ohrid-Prespa-Lakes area and elsewhere, tackling specific eco-system management issues in a similar socioeconomic environment. To mention in particular:

- (a) “Cross border cooperation in the region of Prespa and Ohrid Lakes” (GTZ);
- (b) “Implementing the biodiversity convention: Biodiversity conservation in the Lake District of Ohrid, Prespa and Little Prespa (GTZ);
- (c) land use planning furthering of infrastructure in the Lake Ohrid region (KfW);
- (d) “local environmental action plans” (GTZ); and
- (e) “REReP, regional environmental reconstruction programme for South-East Europe” (GTZ).

91. In order to avoid a duplication of work we ask for a close collaboration and exchange of information among the projects implemented by German Development Cooperation and the proposed GEF project.

### **Recommendation**

92. Germany supports the proposal. The above raised concerns should be addressed during further steps of planning and implementation.

### ***COMMENTS FROM USA (August 25, 2005)***

93. This is a well conceived project and a priority for the countries involved, but we had two questions/concerns:

- (a) Why isn't there a monitoring and evaluation plan? Under Council-approved M&E guidelines, the Secretariat is supposed to ensure that this is taken care of prior to work program inclusion.
- (b) Illegal fishing is a problem that needs more attention and concrete action by both governments. Would appreciate if project could emphasize this more.



**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
(REFERENCE TO GEF/IS/13)

**PERSISTENT ORGANIC POLLUTANTS**

**Moldova: POPs Management and Destruction Project [WORLD BANK]**

***COMMENTS FROM GERMANY***

**General Comments**

94. The project has been well thought out, is technically sound, and will contribute, albeit in a small way, to the reduction of the global POPs burden.

**Specific Comments**

95. As stated in the project document, the inventories on PCB containing equipment and obsolete pesticides in Moldova cannot yet be considered to be fully comprehensive. The project indicators on concrete disposal actions to be carried out are clear and acceptable. However, the Expected Output of “complete disposal of all obsolete POP pesticides (outside of the pesticides dumped on Cismichioi dump site) and about 80 % of PCBs in Moldova” might be too ambitious and should be reconsidered carefully during project implementation.

96. We agree that incineration is the preferred form of disposal compared to the alternative of indefinite storage. Qualified international firms should be assigned while local firms should be involved only on a secondary level to assure safety requirements and prevent accidents.

**Recommendation**

97. Germany supports the proposal. The above raised concerns should be addressed during further steps of planning and implementation.

***COMMENTS FROM USA (August 25, 2005)***

98. While the project is generally sound there are a number of specific concerns we would like clarification on prior to our decision on whether to support.

- (a) There seems to be an operating assumption that all these pesticides ‘are potentially contaminated with POPs’ should be paid for because there may have been cross-contamination. We would like to see details on what pesticides are involved, and what the relative contribution may be of POPs and non-POPs to the inventory. As a general principal we believe there should be a heavier reliance on other funding sources to address the non-POPs content of such stockpiled materials, and want to evaluate if that is a relevant concern for this project.

- (b) With regard to PCBs, the project seems to include costs associated with site remediation, in addition to costs for dealing with stockpiled material and equipment. Again there is a question of the need for further external funding (for site remediation) that cannot be resolved without greater clarity on costs.
- (c) In the future, we would appreciate making specific references to the convention as to which part of annex a part ii applies to the material that they are proposing to take out of service and destroy. The general description provided makes it difficult to make a judgment about the necessity of this work. In this case, based on the information provided, we believe the work is appropriate.