



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 JUNE, 2012

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 June, 2012.

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BIOLOGICAL DIVERSITY

1. Argentina, FAO: Strengthening of Governance for the Protection of Biodiversity through the Formulation and Implementation of the National Strategy on Invasive Alien Species (NSIAS) - GEF ID = 4768

✓ Germany's Comments

- The document only provides a very generic description of the impacts on biodiversity and ecosystem services from invasive species or expected benefits which would flow from the development of the IAS Strategy and its management interventions with the exception of the Canadian Castor. There is a need to deliver solid information regarding impacts of different species on ecosystem and ecosystem services, as well as a scientific justification for the project;
- More attention should be paid to the need to collect appropriate IAS data and information to be able to build an effective and meaningful strategy based on current conditions on the ground, to quantify the current impacts from invasive species, track changes over time, make a serious monitoring and suggest better management practices;
- Gender aspects should be clarified and better integrated in a more strategic form in the project, responding to the particular demands and needs of an effective IAS strategy. With that regard, more information and better gender-related know-how should be considered to improve the PIF, taking into account how gender particularities could contribute or should be changed to develop and implement an IAS strategy. The PIF in its current format simplifies gender issues by limiting the description to a general statement of the better integration of women and youth in the process;
- There should be a special focus on coordination efforts among Argentine and within Argentine and int. institutions, to improve information and knowledge regarding IAS;
- Information on climate change and its implications for IAS should be improved;
- It should be considered if FAO in Argentine should further extend its cooperation network to improve its capacity to run the project, this should consider not only CONICET but also regional and national Universities to strengthen capacity building and foster knowledge exchange in the country;
- The mitigation measure regarding the risk on the lack of commitment of key actors in different sectors (including local actors) should be completed and elaborated in its whole complexity. The measure should be addressed more to the incentives or disincentives of the actors to participate in the implementation of the strategy;
- Component 4 which relates to the development of a pilot program for the eradication of the American Beaver should be revised. Firstly, it should be analysed if this strategy is appropriate in its current forms, and secondly, its enforcement could be difficult to follow

up and monitor, becoming very controversial to an important part of the public opinion in the country, that could be detrimental to the GEF image;

2. Azerbaijan - UNDP – increasing representation of effectively managed marine ecosystems in the Protected Area System - GEF ID = 4730

Germany's Comments

- Component 2 of the project includes the establishment of tourism development zones in and around the Qizilagac National Park during the process of elaboration or update of the management plan. We consider it necessary to include an independent Environmental Impact Assessment (EIA) before the finalization of the zoning process. Furthermore, it is recommended to identify and determine the need of potential additional EIAs in particular for tourism projects to be implemented within the tourism development zone.
- It is also noted that high quality trainings in effective management of protected areas are currently being implemented and offered in neighbouring Georgia through a partnership with the US Department of Interior. The USDol is cofinancing on-site training sessions. It is recommended to investigate possibilities of extending the existing cooperation with Georgia to Azerbaijan and the Qizilagac National Park. Currently, the Shirvan National Park has been already benefitting from the USDol training offer supported by the GIZ Programme “Sustainable Management of Biodiversity in the South Caucasus”.

3. Cuba, UNDP: A Landscape Approach to the Conservation of Threatened Mountain Ecosystems – GEF ID = 4716

Germany's Comments

The project is well presented and thought through in its implementation logic. It applies a holistic natural resource and in particular ecosystem management approach which considers both ecological and socio-economic aspects of biodiversity conservation. Germany requests that the following points be taken into account during the drafting of the final project proposal:

- Consider synergies among the implementation of all three Rio Conventions within the scope of the project, including climate change as well as desertification (UNCCCD); Cuba has gathered thorough and valuable experiences through the implementation of the UNCCD National Action Programme, which should be taken into account in this proposal (e.g. with regard to dryland management, inter-institutional cooperation, etc.);
- With regard to climate change and adaptation to the changing conditions which are expected to affect mountainous areas in particular, potentials for the application of Ecosystem-based Adaptation (EbA) approaches should be considered within the drafting and later implementation of the project;

4. Ecuador, FAO: Integrated management of marine and coastal areas of high value for biodiversity in Continental Ecuador – GEF ID = 4770

Germany's Comments

The proposal is well structured and consistent with the objectives of the GEF and the governmental policy of Ecuador to consolidate the national system of protected areas with regard to coastal and marine conservation (cf. also Aichi-Target 11). However, it should further consider the following aspects to ensure the effectiveness of the envisaged actions:

- Clearly define the role of different entities in the planning and implementation of project-relevant activities (MAE Subsecretaría de Recursos Pesqueros, MAGAP, Fuerzas Armadas, GADs, SENPLADES, and others) - especially since inter-agency coordination with regards to coastal & marine conservation represents a major challenge in the country.
- Coordinate with other initiatives that work in protected areas and their buffer zones at landscape level in the country, for example:
 - a. Project GEF II (has designed some interesting instruments for coastal & marine management, e.g. monitoring of biodiversity in Machalilla National Park).
 - b. GESOREN - GIZ (management effectiveness evaluation, design and management of connectivity corridors, participatory conservation & use mechanisms, etc.).
- The envisaged creation of new protected areas (Component 1) should carefully analyze territorial planning aspects and local development aspirations. Governance issues should be at the heart of any such activity (see IUCN matrix of protected areas and governance types); the new subsystems of the SNAP shall be taken into account (GADs, private and community PAs).
- Component 2 should be reformulated to be more pragmatic and coherent. It is not clear how it is inserted into strategies of sustainable use of fish resources, how the financial sustainability of this activity can be guaranteed, or how this will improve the employability of local communities and / or food sovereignty.
- Component 3: A broad range of legal measures have been defined already for the conservation of coastal biodiversity in Ecuador. However, experience has shown that the laws alone cannot guarantee sustainability – especially if they are too restrictive and enforcement is weak. The project should therefore look into options for creating positive stimuli, such as new fiscal options, incentives for the sustainable management of fishery resources, or payments for ecosystem services to local communities.

5. Ecuador, FAO: Mainstreaming of the use and conservation of agrobiodiversity in public policies through integrated strategies and in situ implementation in three provinces in the Andean Highlands – GEF ID = 4777

Germany's Comments

The proposal is well structured and contains the main relevant issues at stake such as policy and political dynamics, value chains, certification, territorial planning, as well as access and benefit sharing; this broad approach is however also perceived as a weakness of the proposal. It does not seem possible to generate visible impacts at all of the proposed levels of

intervention in three years and with the proposed budget. We suggest instead reducing the scope of the project; this could be achieved, for instance, by not focusing on the training of technical staff (who should generally already have adequate knowledge and skills), or not implementing territorial planning through the project itself. This could be supported through the following recommendations:

- The Agricultural Ministry (Ministerio de Agricultura, Ganadería y Pesca, MAGAP) should be integrated into the project, as it is the national political authority in this issue. MAGAP is a key actor based on its competence within the seeds and plants production system, into which they are very interested to integrate agrobiodiversity elements.
- One of the priorities of the current government is the availability of seeds and plants at producer's level. Therefore, it is necessary to establish alliances with local stakeholders such as the Provincial Governments (*Gobiernos Provinciales*), technical schools and training centers as well as universities, which are needed in order to widen and maintain the ABD use and conservation programs.
- GIZ experiences in Ecuador have shown that ABD initiatives work much better when they are related to food security and climate change. We suggest therefore that the proposal should integrate more aspects of food security and also the design of adaptation measures towards climate change.

6. Georgia - UNDP – expansion and improved management effectiveness of the Adjara Region's protected areas - GEF ID = 4835

Germany's Comments

- Component 2 of the project includes the establishment of Public Private Partnerships (PPP) with hotel companies and catering services as a means of sustaining the financing of the Mtirala Protected Areas. It is recommended to include an independent Environmental Impact Assessment (EIA) as an integrated element of the partnerships to be set up. It is also recommended to identify further options for sustainable financing of protected areas based on the results of the UNDP/GEF funded project "Catalyzing Financial Sustainability of Georgia's Protected Areas System".
- It is also noted that high quality trainings in effective management of protected areas are currently being implemented and offered in Georgia through a partnership with the US Department of Interior. It is recommended to investigate possibilities of extending the provided services to the Protected Areas in Adjara Region. Possibilities for further cooperation for the establishment or updating of PA management plans will exist through the EU-Twinning Project "Strengthening Management of Protected Areas in Georgia" (GE12/ENP-PCA/EN/14), which is due to be launched in 2012.

7. Indonesia, IBRD: Transforming Effectiveness of Biodiversity Conservation in Priority Sumatran Landscapes - GEF ID = 4892

Germany's Comments

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

- The project target is to increase the management effectiveness in priority Sumatran landscapes and ecosystems. The project proposal is based on a plausible impact and intervention logic, and explains how the endangered landscapes could be preserved. Nevertheless, only little attention is paid to stakeholders which in many cases are the cause of environmental degradation (e.g. smallholders and their organizations – as being economic drivers of biodiversity loss). They should be analyzed and specified in more detail and included in the final proposal. A hypothesis should state how and why their behavior/interest should change by the impact of the project. The project measures make poaching or illegal logging more difficult, but it is pointed out that in particular for a number of organized stakeholders and institutions the economic interest of the poaching and illegal logging business remains high. This should be addressed adequately in the final proposal.

8. Indonesia, UNDP: Enhancing the Protected Area System in Sulawesi (E-PASS) for Biodiversity Conservation - GEF ID = 4867

Germany's Comments

- Germany requests that the following point is taken into account during the drafting of the final proposal: The implementation of an intelligence-based poaching and wildlife trade system remains unclear. The final proposal should focus on explanations that demonstrate how this will work in detail and practice. How are the intelligence activities of the system limited to the original purpose? Constraints and potential impacts with regard to civil society should also be clarified.

9. Kenya, UNDP: Enhancing Wildlife Conservation in the Productive Southern Kenya Rangelands through a landscape approach Kenya – GEF ID = 4827

Germany's Comments

- The project objective is relevant and seems to be in line with Kenya's national strategies and plans or reports and assessments under relevant conventions. The full proposal should provide more clarity on the following points / questions, and should consider the following suggestions for improvements:
 - a) What is the legal base for the co-management framework involving private sector, communities and NGOs and other relevant stakeholders?
 - b) What is understood by: "Integration of biodiversity considerations into the operations of key economic sectors"?
 - c) Component 3.1: What exactly is the geographic scope for this component? There is reference to the greater Abseil (including Chula and Stave), but also five conservancies. Will the financial resources be sufficient to cover these vast areas? There seems to be a need to further focus the area and the number of communities targeted for interventions.
 - d) What are the economic benefits for land owners of not fencing, not subdividing and not selling increasingly smaller pieces of land?
 - e) How does the project envisage contributing towards adaptation to climate change?

- f) What kind of Monitoring System will the project use to measure its success / achievements?
- We would like to also emphasize that the project concept be recognizably based on experiences gained by previous / partly still ongoing projects implemented by German bilateral donor agencies.

10. Mexico, UNEP: Integrating the Management of Protection and Production Areas for Biodiversity Conservation in the Sierra Tarahumara of Chihuahua - GEF ID = 4883

Germany's Comments

- A close exchange on aspects of environmental governance with the bilateral Mexican-German project (led by SEMARNAT/CONANP) in the central part of the Sierra Madre Oriental (Tamaulipas, San Luis Potosi and Hidalgo) on building an ecological corridor might be useful. Of particular importance in this regard is the effectiveness and the access to existing programs and financial mechanisms to foster ecosystem management and connectivity between protected areas.

11. Philippines – UNDP – Strengthening the Marine Protected Area System to Conserve Marine Key Biodiversity Areas - GEF ID = 4810

Germany's Comments

Germany requests that the following points be taken into account during the drafting of the final project proposal:

- *Coordination with other related initiatives:* The German Government (BMZ and BMU) through German International Cooperation (GIZ) provides support to the implementation of regional/bilateral programmes, including the bilateral Program on Sustainable Management of Natural Resources, the planned bilateral Project on the Philippines Protected Area (PA) System and the planned regional project on the Sulu Sulawesi Network of PAs. Within the efforts of donor coordination, it is requested that in the final project design reference is made to these programmes and their work experiences. The implementing agency and the executing partners should actively seek contact in order to ensure synergies and complementarities. Concerned national and local authorities should be consulted for improved coordination and cooperation.
- *Need to ensure an ecosystem-based management (EBM) and a harmonized policy framework:* To enhance effective conservation of marine and coastal biodiversity in the long-term and to contribute to coherent development planning, Components 1 and 3 of the final project proposal should include measures that focus on linking the improvement and expansion of the marine PA system (including the systematic identification of new MPAs) with the EBM of marine and coastal areas under Integrated Coastal Zone Management (ICZM) and Marine Spatial Planning (MSP) schemes at local and national levels. This requires also a harmonization of policies and regulations concerning MPAs/MPA networks and those relating to the management/planning of human uses in the wider land- and seascapes that MPAs are part of.

- *Capacity building on CBD PoWPA Element 2:* As the project aims to strengthen MPAs particularly at the local level, the technical capacities of the various parties must include a sound understanding of the conservation benefits of good PA governance. Therefore, and to improve synergies between PA Management Effectiveness (PAME) and governance capacity building, Component 1 of the final project proposal must explicitly include training for local and national level as well as program partners on the implementation of the CBD PoWPA's governance and rights Element 2.

12. South Africa. UNDP – Improving Management Effectiveness of the Protected Area Network - GEF ID = 4848

Germany's Comments

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

- A key barrier to expanding the PA network is seen in the fact that private nature reserves, game farms, mixed farming and ecotourism operations have no security of 'legal conservation tenure'. The project is based on the assumption that the incorporation of these private areas into the PA network would be a low cost expansion mechanism. During the design of the final project proposal a more detailed explanation of the term 'conservation tenure' is required vis-à-vis resource tenure and land ownership, an analysis of the legal implications, and the resources and capacities required for contract negotiation and monitoring.
- The project aims to address the imbalance between the different levels of financial viability of private, state and communal protected areas. The project's strategy for strengthening financial viability of local and community reserves needs to be outlined in more detail, together with the required institutional capacities and governance issues at community level.
- Under Component 2 the approach for improving land use practices in buffer zones with a focus on community benefits need to be elucidated.
- Since some of the proposed intervention areas belong to Transfrontier Conservation Areas (TFCA Ai-Ais-Richtersveld and Great Limpopo) relevant SADC regional programmes should be taken into account, such as the SADC Programme on Transfrontier Conservation Areas. South African good practice examples should be shared with other Member States.
- A reference should be included to the project for combating wildlife crime proposed by UNEP (Strengthening Wildlife Forensic Capabilities. GEF ID = 4937).

13. South Africa. UNEP – Strengthening Wildlife Forensic Capabilities to Combat Wildlife Crime for Conservation and Sustainable Use of Species (target: Rhinoceros) - GEF ID = 4937

Germany Comments

- Under component 2 the project aims at enhancing cooperation and coordination in the SADC region to share intelligence, scientific information and best practices. It is recommended that the SADC Secretariat with its Office for Transfrontier Conservation Areas (TFCA) under the Directorate of Food, Agriculture and Natural Resources is included as a key stakeholder (under B.5).
- A cross reference should be included to the support to anti-poaching efforts proposed by UNDP (Improving Management Effectiveness of the PA Network. GEF ID = 4943).

14. Tanzania, IBRD: Kihansi Catchment Conservation and Management Project GEF ID = 4855

Germany's Comments

The full proposal should provide more clarity on the following questions, and should consider the following suggestions for improvements:

- How does the project envisage contributing towards adaptation to climate change?
- How will the achievement of the project be followed-up and measured? What kind of monitoring system will the project use?
- The proposal should display previously gained experiences by other donor funded projects in the field of managing landscapes, biodiversity and ecosystem services, and reflect how the proposed project will build on these experiences?

15. Trinidad & Tobago, Improving Forest and Protected Area Management in Trinidad & Tobago. GEF ID: 4769

Germany's Comments

- The proposal has undergone several fundamental changes. While it now shows more coherence than in earlier versions, some aspects are still lacking. The overall design of the interventions is rather classical, non-innovative, but might be adequate for the situation. It remains unclear, however, whether implementation capacities for a new major project would be sufficient in the PA system and related actors, especially since several new initiatives are being prepared at present. Thus please highlight challenges this setting might pose for the project objective, and show how these could be addressed (i.e. via strategic cooperation with other players / sectors, additional PA staff, etc.)
- Governance: The threats to individual Protected Areas, the PA system, and the objective of forest carbon storage are not clearly described – governance of forest areas is vital, yet in the proposal it is identified only as a capacity issue, not as a political / societal challenge. How governance issues link to PAs and forest carbon is not evident, so please explain what the key risks and drivers in T&T are, and how

project strategies plan to address these, and provide for efficient and socially inclusive management of the forests and PAs.

- Finance: While apparently improvements in funding needs and financial transparency were made, many aspects remain unclear. Please describe FAO investments and strategic project-interventions in more detail (including their start and end dates, funding amounts); and specify the exact funding requirements (gap). Explain, how the additional funding will lead to concrete improvement of PA management, overall efficiency of the PA system, governance aspects, and forest carbon storage.

CLIMATE CHANGE

16. Stabilizing GHG Emissions from Road Transport Through Doubling of Global Vehicle Fuel Economy: Regional Implementation of the Global Fuel Efficiency Initiative (GFEI). GEF ID: 4909

Germany's Comments

- Fuel standards and fuel pricing are highly sensitive fields of action. Therefore the inclusion of consumers needs to be assured. The project should make sure that measures are accepted by consumers and that no part of the population is neglected through the implementation of certain measures; alternatives have to be provided at the same time. For the acceptance, a step-by-step approach is suitable in order to allow adaptation of behaviour.

17. Regional. Pilot African Climate Technology Finance Center and Network. GEF ID: 4904

Germany's Comments

- The collaboration of the GEF project with other international initiatives such as the CTC and CTCN and international donors is of great importance. Therefore, the list under the description of 'Component 1', '1.2 Networking', 'Pre-identified partners', 'Bilateral agencies' should be expanded by GIZ.
- The revision and/or establishment of climate-related policies and regulations to stimulate investments in clean energy sectors is one of the aspects under 'Component 2', '2.1 Mitigation'. It is noted that the focus should not only lie on policies and instruments, but also on the on the formulation of sound targets and strategies for the investment stimulation in clean energy technologies. Furthermore the establishment of monitoring and evaluation systems in the same context is advisable.
- The given information on the expected GHG direct reductions in chapter B2 and the Annex are hard to comprehend. The calculations regarding GHG reductions from wind power, geothermal power and hydropower appear to be overrated, as e.g. 150 MW installed wind capacity will not lead to 864 GWh per year. Less than half of this amount seems realistic. The same applies for the calculation on hydropower and geothermal power. Therefore the calculated total GHG reductions of nearly 8.000,000 tCO₂e are probably not realistic. We suggest that these calculations are revised and improved during the drafting of the final project proposal.

Canada's Comments

- The collaboration of the GEF project with other international initiatives such as the CTC and CTCN and international donors is of great importance. Therefore, the list

under the description of ‘Component 1’, ‘1.2 Networking’, ‘Pre-identified partners’, ‘Bilateral agencies’ should be expanded by GIZ.

18. Regional. Regional Climate Technology Transfer Center. GEF ID: 4956

Germany’s Comments

- The proposed project should seek close coordination with the Climate Technology Centre and Network. The mentioned collaboration of the GEF Regional Climate Technology Transfer Center with the “Pilot Asia-Pacific Climate Technology Network and Finance Center” and the “Pilot African Climate Technology Finance Center and Network” is of great importance since competition and duplication of effort has to be avoided.

Canada’s Comments

- Canada welcomes the three proposals that focus on the engagement of the private sector through the MDBs, leveraging substantial levels of private investment for climate change mitigation technology. Canada also welcomes the the willingness, expressed in the project documents, for collaboration or cooperation with the future CTCN under the UNFCCC.
- Canada would like to encourage the GEF regional technology transfer pilot project in the Asia-Pacific, approved May 2011, to also collaborate with the CTCN as appropriate.
- Given that the GEF stands ready to continue to support the operationalization and activities of the CTCN, please provide an update on the resources that would remain available for other climate technology transfer projects (from the set-aside).

19. Climate technology transfer mechanisms and networks in Latin America and the Caribbean, GEF ID: 4880

Germany’s Comments

- The collaboration of the GEF project with other international initiatives such as the CTC and CTCN and international donors is of great importance. Collaboration with German development cooperation (GIZ) is recommended since there are broad experiences and activities in the field of low Carbon Technology deployment in several countries of the region.

Canada’s Comments

- Canada welcomes the three proposals that focus on the engagement of the private sector through the MDBs, leveraging substantial levels of private investment for climate change mitigation technology. Canada also welcomes the the willingness, expressed in the project documents, for collaboration or cooperation with the future CTCN under the UNFCCC.

- Canada would like to encourage the GEF regional technology transfer pilot project in the Asia-Pacific, approved May 2011, to also collaborate with the CTCN as appropriate.
- Given that the GEF stands ready to continue to support the operationalization and activities of the CTCN, please provide an update on the resources that would remain available for other climate technology transfer projects (from the set-aside).

20. Argentina. Introduction of Energy Efficiency and Renewable Energy Measures in Design, Construction and Operation of Social Housing and Community Equipment (IADB). GEF ID: 4861

Germany's Comments

- It is planned to construct 120 buildings according to previously defined RE / EE standards as well as 480 conventional buildings serving as a control group. The document lacks a rationale for the need for a control group that is four times as large as the group to be controlled. The added value of this approach against an approach of a small control group should be reconsidered.
- Also against the background that in the long term all social buildings shall be constructed along RE / EE standards, it seems preferable to increase the number of RE / EE buildings and scale down the control group instead. The incremental costs do not seem to be a major obstacle. This could also be seen as a strong signal of ownership.

21. Cameroon. Promoting Investments in the Fight against Climate Change and Ecosystems Protection through Integrated Renewable Energy and Biomass Solutions for Productive Uses and Industrial Applications (UNIDO). GEF ID: 4785

Germany's Comments

- Germany largely agrees to the recommendations given in the STAP Review. It remains unclear how the location of the three pilot activities will be chosen and what kind of renewable energy will be applied. The PIF indicates that combined heat and power and/or small hydropower would likely be used. No indication is given, however, what the assumptions are to achieve GHG mitigation as high as 150,000 t using US\$ 2,000,000 of GEF funds. These numbers suggest a certain pre-selection of technologies and regions that have not been made transparent.
- The selection of a certain region and technology has implications on the replicability of the demonstration projects. Some technologies might be more suitable for a certain region than others. It should be clarified how this will be taken into account both while selecting site and technology for the pilots and for the conceptualization of information campaigns/materials for the replication.

22. Establish Measurement and Verification System for Energy Efficiency in China. GEF ID: 4947

Germany's Comments

- In terms of coordination with other donors in the field of climate change in China, we would like to highlight two GIZ projects implemented or planned on behalf of the German Ministry of the Environment. The project “Greenhouse Gas Monitoring in China” aims to develop technical and institutional capacities for GHG-Monitoring (2011-2013). Another four-year project on capacity building for the establishment of emissions trading schemes at local and national level is planned to start in the second half of 2012 (2012-2016). An exchange with these projects could be helpful in terms of coordinating the energy saving certificates trading with the carbon cap & trade schemes.

Canada's Comments

- Canada welcomes this proposal, and commends China's efforts to reduce energy intensity. Energy certificates trading is an interesting and innovative element in the proposal, and we look forward to seeing how this element of the project is implemented and how this experience may guide other countries in their efforts to increase energy efficiency.
- The level of co-financing envisaged is impressive, and Canada looks forward to seeing additional details on these sources in the final project document.

23. China. Urban-Scale Building Energy Efficiency and Renewable Energy (IBRD). GEF ID: 4869

Germany's Comments

- The proposed project claims to put a focus on statutory requirements for urban planning instead of single buildings. This is a commendable approach due to the large number of initiatives targeting public, commercial and residential buildings already existing in China. Reading the proposal, however, this claim seems to hold mainly for the first component of the project. In component 2, the largest share of GEF money is employed for piloting solar PV on rooftops which is not very closely linked to urban planning but rather constitutes another single-technology approach. We suggest placing a higher emphasis on the regulatory requirements for deployment of solar energy in private households rather than piloting only a small number of PV installations on rooftops. With regard to the proposed solar mapping exercise in component 3, the added value remains unclear. It is very unlikely that the necessary information for planning purposes is not yet in place.
- The monitoring and disclosure aspects mentioned in the proposal should be strengthened. Detailed control plans subsequent to planning and implementation (see page 12) could be a real added value to ensure compliance to the standards and building codes.

24. India: Partial Risk Sharing Facility for Energy Efficiency (IBRD). GEF ID = 4918

Germany's Comments

- The proposed programme is promising. With regard to the allocation of GEF funding and co-financing it could be reconsidered why component B consists of GEF funding only with no co-financing allocated. It is understood that most of the work planned under this component will be done by the GEF agency itself. It is nonetheless surprising that no contribution to the TA component is given by the partners.

Canada's Comments

- Canada welcomes this project, which demonstrates opportunities for innovative use of GEF funds as seed money to leverage private sector lending for energy efficiency. We look forward to seeing how this risk-sharing project is implemented and how this experience may guide other countries in their efforts to increase energy efficiency by using scarce public funds to leverage large levels of private resources.

25. India. Facility for low Carbon Technology Deployment. GEF ID: 4927

Germany's Comments

- The information provided on the foreseen IT-enabled system to promote virtual collaboration amongst research institutes is rather limited and more detailed information ought to be included in the final project document.
- The calculation on which the estimation of GHG savings is based is not comprehensive (as also mentioned within the PIF). Therefore a more detailed and reasonable estimation should be included in the project proposal.
- The importance of collaboration and coordination with other similar oriented institutions shall be highlighted at this point since comprehensive synergetic effects may be found and harnessed. Collaboration with German development cooperation (GIZ) is recommended since there are broad experiences and activities in the field of low Carbon Technology deployment in India.

26. India - Efficient and Sustainable City Bus Services, GEF ID: 4921

Germany's Comments

Proposal is well-structured and is consistent with the GEF objectives and in line with the national policy. Reference could be made to the existing Sustainable Urban Transport Project (SUTP - www.sutp.org). Suggestions for clarifications/improvements to be made during the drafting of the final project proposal:

- Make sure that an effective regulation is in place before promoting greater private participation.

- Consider the role of operators of informal para-transit (in the form of shared tempos and minibuses). Take into account their role as stakeholders and potential opponents of new city bus services if their interests are not well reflected in the new systems.
- Specify the opportunities of consideration of special gender issues in the program.
- Specify how the program can contribute to a better access of poor people to the proposed city bus services (accessible and affordable).
- Consider more prominently the role of urban planning (especially in fast growing cities) and its link to city bus services in the program design.
- Explain in a more detailed way the expected socio-economic benefits of the measures.
- Clarify the selection criteria for demonstration cities in a transparent manner before choosing them.

27. India - Promoting Industrial Energy Efficiency through Energy Management Standard, System Optimatation and Technology Incubation. GEF ID: 4893

Germany's Comments

Germany welcomes this well structured project proposal on industrial energy efficiency in India. Suggestions for improvement of the project relate to the following points:

- Development of EnMS implementation guidance for different clusters (Iron and steel, cement, pulp and paper etc.): Guidelines for different industry sector like Cement, Iron & Steel, etc should be developed which would ultimately help to implement EnMS in industries
- Pilots and EnMS implementation- The project will conduct plant assessment and system audits to analyze scope for optimization of steam, pumping and compressed air systems. Why are under the pilot plants assessment only the steam, pumping and compressed air system considered? Why are not e. g. cooling systems assessed? EnMS should consider the whole process and specific process requirements in different industries.
- Training/ involvement of state designated agencies (SDA's): The SDAs could play a more active role in EnMS implementation as well as certification. Capacity building is needed in this regard.

Please also note that there are other relevant projects of German Development Cooperation in India in addition to the GIZ/BEE led Indo-German energy programme mentioned in the PIF: The Project "Eco Industrial Development" and the Indo-German programme "Advisory Services in Environmental Management (ASEM)" are executed by the Indian Ministry of Environment & Forests together with GIZ with the objective to successfully test and propagate solutions for the environmentally-friendly and resource-efficient management of industrial areas, industrial clusters and the productive sectors. We would recommend coordination with these projects and build on their lessons learned in further developing the proposed GEF project.

28. Malaysia. GHG Emissions Reductions in Targeted Industrial Sub-Sectors through EE and Application of Solar Thermal Systems (UNIDO) GEF ID: 4878

Germany's Comments

- Will a standardized approach to monitoring project results, both GHG reductions and socio-economic benefits be applied for the 40 plants? Please provide details. Also, please provide more details about the socio-economic benefits of implementation. Do estimates exist regarding impact on job creation? How does the project contribute to other national development goals?

29. Maldives - Strengthening Low-Carbon Energy Island Strategies. GEF ID 4629

Germany's Comments

- The envisioned GEF project has substantial overlap with the activities planned and taking place under the GIZ project “Support to the Climate Neutrality Strategy of the Maldives” implemented by GIZ on behalf of the German Ministry of Environment (2010-2014) in cooperation with executing partners such as the Ministry of Housing and Environment and others, which are partly the same as in the envisioned GEF project. We therefore urge close and early coordination with German development cooperation in further developing the proposed GEF project. The implementing agency should actively seek contact and exchange in order to ensure synergies and complementarities and avoid inefficient overlap of activities.

30. NEPAL. Renewable Energy for Rural Livelihood (RERL) (UNDP) GEF ID: 4345

Germany's Comments

- The implementation is highly dependent on donor support, including for the co-financing, and it is not sufficiently clarified in the PIF how investment barriers will be overcome. The final project document should explain why more piloting of mini-hydropower is needed in a country that already has demonstrated such technology. It seems that component 3a/3b offers the incentives to the private sector, more so than Component 2. Germany further notes that the cost per reduced ton of CO₂ for a USD 17.5 million is quite high at almost USD39/ton and would like to see more details regarding other benefits, including an estimate of number of beneficiaries in the final document.

31. Peru. Nationally Appropriate Mitigation Actions in the Energy Generation and End-Use Sectors in Peru (UNDP) GEF ID: 4884

Germany's Comments

- For Component 2, please specify in final project document how the development benefits will form part of the prioritization process.
- Regarding **Component 4** which will set up MRV plans for each NAMA, please provide more information about the proposed MRV Committees. It might make sense to assign the measurement task to the NAMA implementer, as part of the terms for gaining support. This information could then be reported to the committee, which would have the verification role.
- Regarding the risk that climate change impacts will likely affect the generation of electricity from hydropower: it is highly unlikely to expect that adaptation measures are going to be able to stop the melting of the glaciers, which are key sources of hydropower in the country. What other renewable energy sources – beyond hydropower – are being explored?

Canada's Comments

- Canada commends Peru for this project proposal, particularly for showing the clear link between Peru's submitted nationally appropriate mitigation actions (NAMAs) under the UNFCCC and this proposal for GEF funding.

32. Timor-Leste. Promoting Sustainable Bio-energy Production from Biomass (UNDP) GEF ID: 4344

Germany's Comments

- Germany's welcomes the project proposal from Timor-Leste to increase sustainable production of biomass for energy use.
- Please provide information about what is involved in producing bio-digestors and other energy-producing technologies locally. Can all materials be sourced locally? How can more investment from the private sector be leveraged? Will steps be taken to rehabilitate degraded lands?

33. Ukraine - Development and Commercialization of Bioenergy Technologies, GEF-ID 4377

Germany's Comments

- Sustainability certification aspects do not appear to be covered in the proposed project, though they shouldn't be neglected as certification is of key importance when it comes to exporting biomass to the EU which has introduced mandatory sustainability requirements for biomass energy. As Ukraine is envisaging accession to the EU,

efforts to fulfil these requirements seem to be particularly advisable. In order to safeguard against possible adverse environmental impacts, we would therefore request that sustainability aspects are mainstreamed throughout all project components.

- Please note that there is a GIZ Project (2010-2012) dealing with sustainability certification of biomass used for energy production in Ukraine and Russia. Within the efforts of donor coordination, it is requested that in the final project design reference is made to this project and their work experiences. The implementing agency and the executing partners should actively seek contact to GIZ in Ukraine in order to incorporate lessons learned from this project.

34. Regional – Initial Implementation of Accelerated HCFC Phase-Out in the CEIT Region GEF-ID 4102

USA's Comments

- We appreciate that the project document noted that the intent of this project is to be consistent with GEF strategic objectives related to linkages to the Climate Change Focal area through promotion of low-GWP alternatives, and preparation for potential future control measures on HFCs. On that latter point, we encourage the GEF to consider such preparation for all their ozone focal area projects.
- However, we noted that in this project there seemed to be some instances where the project varied from the policy preference of promoting low-GWP alternatives. We request that the project proposal include a specific commitment to transition to low-GWP alternatives, that may include lower GWP HFCs, hydrofluoroolefins (HFOs), hydrocarbons, methyl formate, and other low-GWP alternatives; and to ensure improvements in energy efficiency.

35. Regional: AfDB-PPP Public-Private Partnership Program (AfDB). GEF ID = 4929

Canada's Comments

- Canada welcomes the proposal, particularly the extent of private sector involvement in enabling renewable energy production in Africa. We look forward to more details in the final proposal, including on specific private sector activities and the sources of private sector co-financing, which is currently estimated, but largely undefined.

36. Brazil: Production of sustainable, renewable biomass-based charcoal for the iron and steel industry in Brazil GEF ID = 4718

Canada's Comments

- Canada is concerned with the project's possible overall environmental impact. The proposal does not consider the complete environmental impact of its associated

- activities, specifically the use of and possible expansion of fast-growing eucalyptus plantations as a source of biomass for charcoal.
- While it may make sense from a GHG point of view to use eucalyptus-based charcoal instead of sources, does it make sense from the point of view of biodiversity/land degradation/water resources? How many new hectares of land will be converted to eucalyptus plantations, and from what? If the project is successful and takes off, will this not place increased pressure on deforestation?
 - The current project proposal, under its Objective 2, appears to include an analysis and impact assessment of biomass-based charcoal as part of the project. The project proposal should include this type of analysis up-front, before the GEF commits to any funding.
 - Given the GEF's obligation to generate global environmental benefits, if this proposal involves trading-off GHG reductions with biodiversity loss, perhaps the GEF is the not the appropriate financing mechanism for it.

37. Indonesia: Third National Communication to the United Nations Framework Convention on Climate Change GEF ID = 4993

Canada's Comments

- Canada thanks Indonesia for its proposal and for the substantive efforts it is making to conduct its third National Communication under the UNFCCC, together with its first biennial update report.
- We are concerned, however, at the expanding amounts of resources that are being channeled into reporting activities in general. In the Indonesia project, for example, the country's second National Communication was developed at a cost of \$428,000, while this project proposal amounts to a total of \$25.5 million, representing an increase of 5858%. Canada would like to gain a better understanding of the reasons for this increase.
- Canada would also like to gain a better understanding of how these resources will enable the establishment and maintenance of permanent national teams and in-country MRV systems, as these will be critical to achieving the more comprehensive and frequent reporting that is now required as a result of decisions adopted in Durban.
- Key questions are therefore: How will these resources ensure nationally-owned monitoring, reporting and verification processes? How will they build national capacity and sustain ongoing needs in the future? If consultants are to assist countries with the reporting exercise, how will countries ensure that necessary knowledge transfer, training and capacity building takes place in order to enable the establishment of permanent in-country MRV systems?

38. Azerbaijan: Initiation of the HCFC's Phase Out and Promotion of HFCs-Free Energy Efficient Refrigeration and Air-Conditioning Systems GEF ID = 4602

Canada's Comments

- The proposal indicates that the country consumes 18.95 ODPt of HCFCs, with that estimate established through field visits. Please confirm that the project's objective is to phase out the entire amount of HCFCs.
- Of note, due to institutional difficulties, only a small portion of HCFCs imported have previously been identified and, therefore, the latest country's reported HCFC consumption under the Montreal Protocol is only 0.3 ODPt. On the basis of its

official consumption, the country would only require a much smaller project to comply with the 2020 99.5% reduction because its reported baseline consumption is 14.9 ODPt – so “officially” it has already achieved a 98% reduction. However, accepting that the official consumption is significantly under estimated, the GEF's approval of the phase-out project should be contingent on Azerbaijan reporting its real consumption from now on and, to the extent possible, the country revising the data that was underestimated in previous years.

- Of the \$2M requested for phase-out projects, there is no breakdown indicating how much would be used for the: (a) phase-out of HCFC-141b in foams; (b) phase-out of HCFC-22 in refrigeration manufacturing; and (c) phase-out of HCFC-22 refrigeration servicing. In fact, no specific projects as such are presented for these sectors. For the manufacturing sector, it is not clear to what technologies the enterprises will be converted to, and consequently what the capital and operating costs are expected to be; rather some potential technologies have been identified. In the servicing sector, we could not find a description of the activities that will be funded. Please clarify how the \$2M figure was selected.
- Given that the technologies in the manufacturing sector are not determined in the project proposal, it is not possible for the GEF to know whether the desire expressed in the proposal to avoid high-GWP HFC technology will in fact materialize. Please comment.

General comment on “POPs” section of work program

Canada's Comments

- We note that the work program continues to reference a POPs focal area (and sometimes an Ozone Focal Area, or a Sound Chemicals Management and Mercury Focal Area), instead of the Chemicals Focal Area. This should be corrected.
- Canada is pleased to see more Chemicals Focal Area projects presented in the work program. We are particularly glad to see countries starting to focus on actions required to implement the Stockholm Convention, and we welcome the first mercury full size project and look forward to seeing more mercury projects.

LAND DEGRADATION

39. Global. Support to GEF Eligible Parties for Alignment of National Action Programs and Reporting Process. GEF ID: 4829

Germany's Comments

- Germany acknowledges the importance of the NAP alignment process as an approach to foster efficiency of policies and measures of sustainable land management at national level as well as the coherency of UNCCD implementation efforts of the different parties in line with the 10-year strategy. Nonetheless the process of NAP alignment must not only be understood as a formal response to decision 3/COP8 aligning national policies with COP decisions. It must rather take on board past experience with failed NAPs, whose implementation suffered from a lack of political relevance in affected countries and their technical and financial partners. Consequently alignment processes should rather be understood as an opportunity to raise the ownership for DLDD within the policy framework in the affected countries and to launch a dialogue with donor partners. Therefore an inclusive process with the relevant stakeholders is necessary to define the needs, the expectations and the vision of the NAP in order to assure its coherence with and integration into the sectoral strategies and policies. We therefore suggest that in the final project proposal the approach for the consultation process and the role of the national consultants will be further determined considering the above mentioned.

40. Namibia. Sustainable Management of Namibia's Forested Lands. GEF ID: 4832

Germany's Comments

- The PIF mentions the plan to operationalise sustainable supply chains for 4 NTFPs. It is therefore suggested that those Community Forests with the same products be clustered to make the process simpler and more efficient.
- The scope of work proposed in this PIF is in parts related to activities of the future GIZ Project on Biodiversity and Climate Change (operating in selected CBNRM areas in Kavango) and is identical to that of the next phase of the Community Forestry in Namibia Project funded by KfW, the difference between both interventions being geographical areas of operation. However, there is still an overlap in the areas of intervention. It is therefore suggested to agree as soon as possible on how to address the issue of overlapping areas and create synergies among these projects.
- Revise the result framework strictly applying the GEF5 strategy formulation (outputs and outcome indicators). Outcomes should clearly define the global environmental benefits of the project including indicators to measure and monitor these benefits relating to component 2.

- Include lessons from other similar initiatives in the region especially relating to component 2 with regards to livestock management, adaptive capacity approach to managing climate risks in Namibia and the methodological challenges in measuring carbon in dry lands. Clarify which practices will be selected from similar initiatives for the pilot area and what criteria are used to determine the selection of the practices.
- Clarify the methodology to be used for forest valuation and the criteria for selecting the specific methodology.

MULTIFOCAL AREA

41. Regional - IDB-PPP MIF Public-Private Partnership Program GEF ID 4959

Germany's Comments

- The GEF funding for three venture capital funds under this Program is supposed to achieve an average leverage factor of 1:19 – particularly boosted by the Indi Fund with an expected leverage of 1:40. Considering that the composition of cofinancing by the private sector is barely specified in the PIF, that leverage factors have often been overestimated in the past and a factor of 1:40 seems far above ordinary leverage assumptions, we request detailed information on the sources of cofinancing in the final project document. The M & E plan for the project should also make provisions to monitor and evaluate whether agreed cofinancing has materialized during project implementation.

42. Ecuador/Peru (Regional), UNEP: Multiplying Environmental and Carbon Benefits in High Andean Ecosystems - GEF ID = 4750

Germany's Comments

- The proposal considers the enhancement of multiple and social benefits in high Andean Ecosystems, which is very important for the provision of different ecosystem services. It seeks synergies between biodiversity conservation, land management and climate change, but still has a strong focus on carbon benefits. The research, assessment and monitoring of other relevant ecosystem services such as water capture, regulation, infiltration, soil fertility, etc. should also be considered.
- There is a need to specify in more detail the different institutional, scientific and financial barriers that have to be overcome in order to address more specifically the required measures and activities;
- Considering the STAP comments, there is an apparent overlap in the scientific and technical content in Component 1 (science base and tools development) and 4 (project monitoring). It would be good to integrate both parts in a form that could help to structure all project components, including Component 3, which relies on good tracking of ecosystem restoration benefits. The full proposal should assure that the project will develop suitable impact indicators that will focus on global environmental benefits to be tracked through the project life and beyond;
- The expected outputs should be structured in a form that could be better quantified. For this, it is recommended to work on the construction of a good and quantified baseline;
- It is necessary to characterize the different stakeholders in a more specific and concrete way, mentioning e.g. indigenous organizations, NGOs and other institutions, which should work closely with the project in each of the country; this includes also the consideration of existing PES schemes and Funds that are already operational in the High Andean Region (such as FONAG or Paramo Funds in Tungurahua), and which could contribute to and benefit from the project;

- It would be useful to concretize the meaning of “decision tools” used in the proposal in a broad form to better understand which kind of models and tools are going to be supported;
- Gender aspects should be included in a more specific way throughout the project structure;
- It would be useful to consider ongoing discussions on Ecosystem Based Adaptation approaches and to create synergies with the corresponding communities to improve knowledge exchange;

43. Regional. Implementing Integrated Land Water and Wastewater Management in Caribbean SIDS. GEF ID: 4932

Germany’s Comments

- The full proposal should clearly identify how the reduction of pressure on forest resources and the generation of sustainable flows of forest ecosystem services are achieved. Further strategies should be developed on how SFM will be implemented and potential cooperation partners in the field of SFM and the provision of Ecosystem Services should be identified. In addition, there should be a clarification whether the project aims at improving solely SFM or at developing national REDD+ strategies. The estimations for potential carbon sequestrations through SFM seem quite high for the various national projects; need to further explain calculation factors.

44. Afghanistan, UNDP: Establishing integrated models for protected areas and their co-management in Afghanistan - GEF ID = 4839

Germany’s Comments

- Germany requests that the following requirements are taken into account during the design of the final project proposal: The involvement of the relevant ministries and institutions (such as NEPA and MAIL) in the whole project design should be a precondition and is essential for the success of the project. The final project design should therefore also include a greater focus on “institutional capacity development” in the context of project implementation. The PIF does not provide clear information how existing Afghan governmental structures will be incorporated into project implementation. We also would like to emphasize that the security-related risks for implementation and success are much underestimated; the project document lacks information regarding these security-related aspects and possible consequences for project implementation.

45. Albania. Environmental Services Project. GEF ID: 4778

Germany’s Comments

- Payments of down-stream beneficiaries for environmental goods and services created up-stream are likely to be effective only in the medium to long term and are therefore unlikely to mitigate the risk of short-term reduction of community uptake/replication of sustainable practices (Risk 1). The full proposal should therefore clearly identify mitigation measures that are effective already in the short term (see also STAP recommendation 5).

46. Bosnia and Herzegovina. Sustainable forest and abandoned land management project. GEF ID: 4779

Germany's Comments

- We ask to consider alternatives to converting scrub forest/abandoned pasture and bare land into native high forest. In a country which already has the highest percentage forest cover in Europe, landscape diversity as well as biodiversity may be lost if non-forested lands are actively converted into forest, which may contradict objective 2 of the biodiversity results framework, i.e. “mainstream biodiversity conservation and use into production landscapes...”. This risk has to be weighed against the gain of added carbon sequestration on these relatively small surfaces. An alternative approach more compatible with biodiversity conservation objectives would be to sustain and manage open lands while improving existing forests (e.g., enriching and/or gradually converting non-native into native forests), which offers potential for increased carbon sequestration over larger areas.

47. Brazil, IADB: Consolidation of National System of Conservation Units (SNUC) and Enhanced Flora and Fauna Protection – GEF ID = 4859

Germany's Comments

- Germany suggests incorporating in the final project design, within Component 5 a stronger focus on incentives and benefits for the local population and communities to achieve strong community support for conservation objectives in areas with new PAs in implementation. The potential for economic initiatives within biotrade, sustainable tourism etc. should be explored. Therefore, cooperation with the private sector should be explored and potentially enforced. Methodologically, the TEEB approach could provide appropriate guiding in this context. In terms of cooperation with German Development Cooperation, synergies with the ongoing project on Biodiversity monitoring / REDD+ (GIZ, MMA, ICMBIO) should be explored:

48. Brazil, IADB: Recovery and Protection of Climate and Biodiversity Services in the Paraiba do Sul Basin of the Atlantic Forest of Brazil – GEF ID = 4834

Germany's Comments

Germany requests that the following requirement is taken into account during the design of the final project proposal: The project proposal is aligned with projects supported by the German

Ministry of the Environment (BMU) developed in cooperation with the Brazilian Ministry of the Environment (MMA) and the Chico Mendes Institute for the Management of Protected Areas (ICMBio), respectively, the Atlantic Forest Protection Project as well as the Project on Biodiversity Monitoring. Therefore, it is recommended a close coordination with these projects in order to benefit from the outcomes and outputs already provided by them and to avoid duplicate efforts but promote complementary ones.

Two main aspects of the above cited projects under the coordination of the Brazilian Environmental Ministry MMA that can significantly contribute to this project proposal are:

- Capacity building for Conservation Units staff on Management Tools such as the Program for Results (PGR) and Strategic Management Tools, which can contribute to project Component 3 (Increase effectiveness and financial sustainability of Conservation Units);
- Lessons learnt from the PES schemes for increasing financial sustainability of Conservation Units, as well as promoting their role for territorial politics, contributing to the goal of Component 3.

In addition, although the project shows a good institutional arrangement as well as a network with the main institutions and initiatives for the protection of the Atlantic Forest, it is highly recommended that the project coordinates efforts related to payment for ecosystem services with the PES Learning Community (www.aprendizagempsa.org.br) in order to empower and create synergies with the Community platform regarding capacity building, to exchange experiences as well as to share best practices and lessons learned.

49. Chile, UNDP: Supporting civil society and community initiatives to generate global environmental benefits using grants and micro loans in the Mediterranean ecoregion of Chile - GEF ID = 4939

Germany's Comments

Germany asks that the following comments are taken into account:

- For the development and implementation of the project it could be useful to have more specific information on conditions and trends of different ecosystem services in the region. This should be more specifically connected to the different drivers and underlying causes of such drivers. This information could be used to better address the different land uses and activities to be supported, including also the specification of investment criteria for the microcredit;
- It is recommended to build the microcredit system on more concrete experiences and lessons learned coming from SGP. The description of lessons learned is still too generic in order to address or give more orientation for the establishment of the new system;
- The possible monitoring of different ecosystem services apart from carbon (such as biodiversity, hydrological regulation, soil formation or soil fertility) need to be considered in a stronger form;

- The outcomes of the project should be better clarified. There is a confusion if the 700.000 has of Mediterranean forest that should be certified (1.1.) includes the 140.000 has (3.1.) where land degradation should be avoided and the 10.000 has of pilot projects (2.1.) where promotion of conservation and enhancement of carbon stocks through land use, land use change and forestry will be monitored. It would be useful to clarify the different has amounts in order to facilitate the monitoring of the project;
- The information regarding the calculation of carbon stock in Component 2 should be described more specifically to be able to develop an appropriate methodology for carbon monitoring. Here it is necessary to consider approved methodologies from e.g. VCS and CCB, to take into account the knowledge and experience that already exist. GEF recommends the Carbon Benefits Project Methodology, which is currently being completed;
- It should be clarified if, how and where PES could be used in the project;

50. Cameroon. Sustainable Forest Management under the Authority of Cameroonian Councils. GEF ID: 4800

Germany's Comments

- As outlined in the PIF one of the main barriers for SFM and improved forest governance in Cameroon are the scattered responsibilities across different ministries and agencies (in this case especially relevant: MINFOF, MINEP and CTFC). The full proposal should therefore clearly outline how the coordination/collaboration between these institutions is to be ensured (besides establishing a coordination committee). The commitment of both institutions to work closer together and harmonize their activities should be a prerequisite (for a functioning coordination committee, the successful implementation of the Land Use Plans which are to be developed, etc.). The institutional challenges also have to be taken into account before setting up new structures (coordination committee, new local forest protection committees, etc.) to avoid further fragmentation of activities in the forest sector. It should furthermore be described more in detail how the cooperation with other donors (e.g. GIZ) and relevant initiatives will be ensured and how lessons learned will be used.

51. Côte d'Ivoire - UNEP - Integrated Management of Protected Areas in Cote d'Ivoire, West Africa - GEF ID = 4970

Germany's Comments

Suggestions for improvements to be made during the drafting of the final project proposal: The outcomes and outputs in the results framework need to be more clearly defined. Some of the missing details are mentioned later in the PIF but should be incorporated clearly in the results framework. More specifically:

- The project intends outcomes both at the level of the pilot site and at the level of the national network of parks and reserves. However there is no mention of the strategy to upscale the lessons from Banco to the national network.
- Component 1: The project seeks to improve the capacity of OIPR and local communities to sustainably manage the PA network, however outputs only mention the implementation of the OIPR training plan on surveillance and environmental monitoring; this does not seem sufficient.
- Component 2 lacks significant details about the kind of sustainable financing initiatives and PPPs planned; the PES scheme mentioned later is not included here and it remains unclear throughout the document how this scheme will function. Water and Tourism are mentioned at some point but the linkages have to be made more explicit.
- Component 3: While income generating activities and training of associations on environmental themes are mentioned, what seems to be missing is the incorporation of existing local strategies for sustainable use and conservation (e.g. are there any existing local strategies for sustainable use of forests, including NTFPs? Local conservation initiatives such as Community Conserved Areas?) Building on such local initiatives (if they exist) would enhance the sustainability and local ownership of the project.
- The project seeks to “improve the community involvement in the sustainable management of natural resources”. However the results framework lacks any clear outcomes/outputs on the participation of local stakeholders in decision-making. Some elements are mentioned later in the document (consultative framework for land tenure conflicts and park boundaries, local management committee, claim of customary land rights), but a clear strategy to improve participation is lacking. There is also no mention on whether and how the benefits from a PES scheme would be shared with local communities.

Some of the sources of co-financing remain vague (private sector; foundations). This should be addressed in the full proposal.

Two suggestions for further linkages with other projects: linkages with IUCN should include the EU-BIOPAMA project; also linkages to the proposed project in Cote d’Ivoire on Access and Benefit Sharing and its potential for supporting protected areas – through financing and non-monetary benefits such as inventories of genetic resources - might be beneficial (the latter is still under development by the national ABS focal point).

In accordance with the STAP comments, Germany also sees a need to revise the project description comprehensively to describe the project measures, intended outcomes and outputs more in detail (in particular for the SFM/REDD+ component) as they are only described minimally so far. The current proposal does not clarify how the project intends to achieve its objectives. We furthermore share STAP’s comment that a more thorough description of the main barriers preventing sustainable forest management is needed. Additionally it should be outlined how the cooperation with other donors (e.g. GIZ) and relevant initiatives will be ensured and how lessons learned will be used.

52. Ecuador, FAO: Conservation and Sustainable Use of Biodiversity, Forests, Soil and Water to Achieve the Good Living (Buen Vivir / Sumac Kawsay) in the Napo Province – GEF ID= 4774

Germany's Comments

- The principal project partners are the Environmental Ministry (MAE) and the Provincial Government. Since the Project has a strong focus on sustainable production we would like to emphasize the importance of including the Agricultural Ministry (MAGAP) as the responsible national authority for agriculture;
- The German Government through its technical and financial cooperation supports both the Sumaco Reserve and the Yasuni Biosphere Reserve (2013) in the Amazonian area. The full GEF project should include coordination and agreed activities between both programmes in order to share experiences and lessons learnt;

53. India. Worldbank – Integrated Biodiversity Conservation and Ecosystem Services Improvement. GEF ID = 4942

Germany's Comments

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

- Since the drivers for biodiversity loss are located in sectors other than forest and conservation, systems for mainstreaming biodiversity need to include the sectors/stakeholders outside the responsible departments and ministries for forest and biodiversity. Based on a more detailed analysis of underlying causes for biodiversity loss in the participating states/demonstration areas and the envisaged stakeholder mapping, the project should put in place a strategy for involving such sectors and stakeholders in its capacity building measures.
- Through sub-component 2.3 the project aims at developing community-based models for sustainable utilization of NTFP. Strengthening value chains for new and novel products developed through value addition of NTFP resources is a complex task with many pitfalls and requires inputs from several service providers, including research organizations and private sector. It is suggested that criteria are developed for the selection of promising NTFPs, which allow the project to have products in markets within the lifespan of the project, and which consider requirements for Access and Benefit-sharing (ABS) under the Biological Diversity Act 2002.
- The impacts of climate change on people and ecosystems and on project objectives are underestimated (B.4 Risks). The final project proposal should outline how vulnerabilities will be assessed and adaptive capacities strengthened.
- Apart from other government agencies and line departments, important stakeholders to be included (under B.5) are State Biodiversity Boards, Biodiversity Management Committees (BMCs), as well as research institutions/universities and private sector.

Within the efforts of donor coordination the implementing agency should also seek synergies with projects of bilateral German Development Cooperation (e.g. GIZ projects “Climate Change Adaption in Rural Areas”, “Climate Change Adaptation in North Eastern Regions (CCA NER)”, and the new project “Conservation and sustainable utilization of biodiversity”).

The final draft needs to clarify how the objectives to reduce forest degradation and biodiversity loss are to be achieved without focusing on the rural poor population. Lessons learned from the GIZ/KfW „Socio-economic strengthening of tribals and rural poor and natural resource management in Tripura“ (even though the project region differs) and other relevant projects might be useful in this regard.

54. Kyrgyz Republic. Sustainable Management of Mountainous Forest and Land Resources under Climate Change Conditions. GEF ID: 4761

Germany’s Comments

The project is having strong overlaps with engagements of other donors (above all IFAD, Livestock and Market Development, KfW/ARIS, Communal Reforestation, KOICA, Reforestation with the private Sector, AA/GIZ Disaster Risk-Reduction) which will require careful negotiations during the PPG phase. At the same time the present situation may create a favorable environment for setting-up mechanisms of donor harmonization and alignment in the Kyrgyz forestry sector.

General remarks

- Output 1.2.1 refers to management of forest areas by forest user associations, which until now exist only on paper. The forest reform concept composed of decentralization of forest management and of the transfer of management mandates to user associations is still under discussion (see above: rapid institutional change and below point 4).
- Targets under Component 1 and figures in the table on page 10 of the PIF suggest that pasture grounds outside the State Forest Fund Land are not concerned by the project. Only those pastures are, however, under the regime of Pasture User Associations. In case this is really meant to be so, PUAs are then automatically excluded from the reflection on improved cross-sector cooperation (Output 1.1.2). This makes up for the special importance of checking once again the reasoning for the selection of pilot areas (ref. point3 in the list below).

In addition to STAP recommendations, especially n° 1-3, to which we fully subscribe, GIZ recommends the following items to be analyzed in depth during the PPG phase:

- Appraisal and, if deemed necessary, revision of the implementation structure design; we do not hide our skepticism regarding the feasibility of a mixed structure composed by staff of the Ministry of Agriculture and the State Agency and under the guidance of the latter.

- Detailed investigation into those elements of the regulatory framework likely to condition the implementation of the full project and which are already (or will be) under scrutiny at the time of running the PPG phase.
- The choice of pilot regions has been made along the lines of criteria which have meanwhile been overtaken by events; the process will have to be repeated under up-to-date conditions and considering a changed topography of the stakeholder-landscape.
- Analysis of available options for taking up under the existing decentralized institutions dealing with natural resources management (water, pasture, wildlife) also issues of decentralized forest management; how to merge local institutions hitherto organized along sector lines in order to create structures for integrated natural resources management at local level.

55. Malaysia. Improving Connectivity in the Central Forest Spine (CFS) Landscape - IC-CFS. GEF ID: 4732

Germany's Comments

- Large monoculture plantations with exotic rubber trees (*Hevea brasiliensis*) are a widespread land-use form in Malaysia. For the purpose of landscape sustainability and ecological connectivity it is crucial that only polycultures with native species are established. In line with STAP comment 4, the full proposal should therefore provide more detail on the design and location of the rehabilitation activities under project component 2.

56. Mexico, IBRD: Conservation of Coastal Watersheds in Changing Environments - GEF ID = 4792

Germany's Comments

- Since this project may significantly contribute to combat desertification and land degradation it is suggested for component 4 (Piloting innovative mechanisms for inter-institutional collaboration and promoting social participation) that federal (SAGARPA) and state ministries for agriculture are invited to take actively part in planning and implementation processes. These might strengthen also the objectives formulated under the Land Degradation Results Framework – namely those related to sustainable land management.
- To stimulate also the integral approach with the coastal and marine areas in some cases it might make sense to stimulate also the dialogue with CONAPESCA and INAPESCA on fishery and aquaculture issues.
- The CONANP Strategy on Climate Change in Protected Areas (Estrategia de Cambio Climático en Áreas Protegidas (ECCAP) is not mentioned, but activities and lessons learned in components 1 and 3 might be suitable for the further development of this

strategy. Therefore we suggest defining the contribution of this project for the CONANP Strategy.

- **We would like to highlight the high amount of cofinancing which is foreseen to be provided by Germany (34,226,000 US\$). Germany requests for this project that the Secretariat sends the draft final project documents for Council review four weeks prior to CEO endorsement**

57. Namibia. Namibian Coast Conservation and Management Project GEF ID: 4669

Germany's Comments

- Germany approves the PIF. We fully agree with the points raised by the STAP review. Especially the issue of rehabilitation in the arid areas of the project should be explained in more detail in the final proposal. The co-financing by BMZ, with GIZ being the implementing agency of US\$ 500,000 should be clarified, i.e. this co-financing refers to which of the GIZ projects so that adequate measures can be taken to ensure complementarities and synergistic implementation.

58. Turkey. Sustainable Land Management and Climate Friendly Agriculture. GEF ID: 4583

Germany's Comments

- Germany appreciates the holistic approach and approves the PIF. Due to the observed tendencies in land use changes it is recommended to include a systematic monitoring of land use into the biodiversity monitoring system in order to better detect on-going conversions of rangelands etc.
- Germany is currently conducting the project “Sustainable Management of Biodiversity, South Caucasus” in neighbouring Georgia, Armenia and Azerbaijan, implemented by the German International Cooperation, GIZ. This project has strong linkages to the establishment of biodiversity monitoring systems, SFM and SLM including sustainable rangeland management. We recommend to contact the GIZ regional office in Tbilisi to discuss possible synergies especially on monitoring of biodiversity and land use based on cost-efficient remote sensing technologies as well as restoration of degraded forests and rangelands.

59. Lao PDR. GMS-FBP Strengthening Protection and Management Effectiveness for Wildlife and Protected Areas. GEF ID: 4650

Germany's Comments

- Several GIZ commissioned studies showed that due to the low deforestation pressure in NPA in Lao PDR, the financial feasibility of REDD+ in NPA is hard to achieve.

Buffer zones around NPA and wildlife - corridor zones in-between NPA were identified as promising areas for successful REDD+ projects with various social and environmental co-benefits. The full proposal should therefore also consider these areas for piloting REDD+ in Lao PDR.

60. China - FAO - CBPF-MSL: Piloting Provincial-level Wetland Protected Area System in Jiangxi Province. GEF ID = 4662

Germany's Comments

- Germany requests that the following requirement is taken into account during the design of the final project proposal: we would like to emphasize that the impact of the proposed water regulation of Poyang Lake (dam), which surprisingly has not been identified as a threat as it is likely to change the ecological character of the wetlands, need to be adequately addressed by the full proposal. Moreover, the full proposal should also take account of the results of the recently terminated GIZ project „Sino-German cooperation platform on conservation of highly carbon-storing and species-rich ecosystems (CSE)”, which cooperated with Nanji National Nature Reserve, and the project should seek synergies with the ongoing GIZ project “Wetland Biodiversity Conservation in China”.

61. Laos, IBRD: GMS-FBP Strengthening Protection and Management Effectiveness for Wildlife and Protected Areas - GEF ID = 4650

Germany's Comments

- The full proposal should clearly identify how synergies with the ongoing German engagement within the *Climate Protection through Avoided Deforestation (CliPAD)* programme can be achieved, which is focusing on REDD+ demonstration activities in and around the mentioned NPA Nam Et Pou Loy in Houaphan.

62. Russian Federation: ARCTIC Environment Project (Financial Mechanism for Environmental Rehabilitation in Arctic), GEF ID: 4964

Germany's Comments

- The overall project concept makes sense in our view but we follow the position pronounced by STAP, stating that the baseline situation is not yet described clearly, i.e. which policies are in place and which are the concrete barriers the project seeks to overcome. This, together with the lack of indicators, should be addressed in the final proposal.

63. Thailand. GMS-FBP Strengthening Capacity and Incentives for Wildlife Conservation in the Western Forest Complex. GEF ID: 4677

Germany's Comments

- Thailand is one of the FCPF member countries, which has not established an R-PP yet. Hence the national setup of REDD+ and the readiness activities remain unclear. The full proposal should therefore clearly outline how links to the national development of REDD+ can be established and how incentives for wildlife conservation could become an element in the national REDD+ readiness process.