



GLOBAL ENVIRONMENT FACILITY
INVESTING IN OUR PLANET

COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE GEF
JUNE 2020
WORK PROGRAM

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEF June 2020 Work Program

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**JUNE 2020 GEF WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE: GEF/C.58)**

IMPACT PROGRAMS

1. Global – (Guinea, Nicaragua, Uzbekistan, Kenya): Food Systems, Land Use and Restoration (FOLUR) Impact Program- Addendum II, World Bank/ FAO (GEF Program Financing: \$26,200,000) (GEF ID: 10576)

✓ **France Comments:**

- The modification to the **FOLUR IP** project adds four countries, three of which incorporate deforestation + targeting of industries that are especially responsible for deforestation and of “zero deforestation” industries, which is in line with the French National Strategy to Combat Imported Deforestation (*Stratégie Nationale Française de lutte contre la Déforestation Importée SNDI*): Coffee in Kenya, palm oil in Guinea, cocoa and beef/byproducts in Nicaragua.

✓ **Germany Comments:**

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

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

- In order to enhance resilience and capacities for adaptation within the new project countries, Germany proposes that the full proposal should clearly identify and provide detailed information on how the local governments and civil society organizations in the respective new project countries will be strengthened as change agents of an enabling environment. Furthermore, it should be depicted how the national LDN Target Setting programmes are addressed (priority on avoiding land degradation) in order not to incentivize degradation through restoration support. The overall activities might be placed in the framework of the UN Decade on Ecosystem Restoration 2021–2030 to create further awareness with decision makers. Regarding Uzbekistan: include a more detailed description on the issue of irrigation agriculture and wheat production (high need of water for wheat production). Germany also recommends taking into account the new national Agriculture Strategy.

✓ **United Kingdom Comments:**

- Nicaragua – What safeguards are in place to ensure funds are used according to the project outline.

- Kenya – The UK asks that implementing agencies should undertake due diligence on the proposed area of operation and ensure all relevant stakeholders, GoK, local politicians and communities in the area of operations, are engaged. We expected the Environmental & Social Safeguards assessment to bring out areas of possible concern and mitigations actions that need to be taken to avoid any conflicts on the ground.
- *(As indicated ahead of the Council meetings, the UK would like to review this project before CEO endorsement).*

✓ **Switzerland Comments:**

- Could you possibly reiterate again the theory of change for the entire program and explain how these specific child projects are aligned with the theory of change for the entire program?
- In some cases, the co-financing numbers seem to be very high in our understanding in particular because the co-financing is often declared as in-kind contribution. Could you explain to us how you will ensure that the co-financing will materialize, in particular when it is declared as in-kind contribution? We prefer you indicate realistic co-financing figures, which can be met by all project and program partners.
- You have only marked these projects with the climate change mitigation Rio Marker. We would also expect that the projects would lead to increased resilience and therefore would expect them to also be at least partially relevant for climate change adaptation. Could you explain, why you are not capturing the climate change adaptation benefits of the program?
- Can you explain how you will address the potential challenges and trade-offs between truly integrated sustainable land management and the creation of efficient sustainable supply chains, i.e. efficient production patterns?
- The Voluntary Guidelines on Land Tenure (VGGT; CFS, FAO) should in general be considered in each child project and not just in some. At the moment they are only considered in some child projects.
- We believe WOCAT and the application of WOCAT Tools could be interesting for all child projects and should be considered in all of them. At the moment they are only considered in some.
- We would like to advocate to increasingly use also the term and apply agroecological practices and not just speak of sustainable agriculture. In line with this we would welcome a stronger formulation of the ecological targets linked to agroecological practices in sustainable agriculture.
- It is not clear to us how small holders in particular women will benefit from the various child projects. Could you please further clarify this in the further development of the program and the various child projects?

- Improved diversification of the agricultural production can also lead to increased resilience of small holders. This aspect could be further highlighted in all the child projects.
- In collaboration with the private sector strict ESG standards should apply. The product specific standards as mentioned in the various child projects is a good step in the right directions. To achieve ambitious social and environmental goals we need to continuously improve the standards. The projects should add to the further development and improvements of these standards.
- Several child projects highlight the positive impact of the project on biodiversity and the reduction of climate change, but unfortunately few indicated the positive impact with regards to reduced land degradation although this impact program should have a significant positive impact in particular linked to the reduction of land degradation.

OTHER PROGRAMS

2. **Global – (Bhutan, Malaysia, Nigeria, Pakistan, South Africa): GEF -7 Global Wildlife Program -Addendum, World Bank, UNDP/ IUCN/ UNEP/ WWF-US (GEF Program Financing: \$16,922,937) (GEF ID: 10561)**

✓ Norway/Denmark Comments:

General comments:

- We strongly support the objective here, to ‘Promote wildlife conservation and crime prevention for sustainable and resilient development’. In these times of COVID 19- wildlife protection seems more important than ever before, also for protecting human health.
- We note that there is a strong potential for co-financing here, and value the efforts of raising funds from a large variety of different actors. We also think it’s positive that you are engaging with the private sector.
- We think the effort of combining wildlife protection and tourism in Bhutan and Nigeria is an interesting case of biodiversity finance and know that this has worked well in other countries. Nevertheless, we wonder if you have any risk assessment here - what will happen if tourism fails? COVID 19 shows that this can be a project that is riskier than before, due to travel restrictions. Do you have any backup-plan if the tourism fails to generate the income expected?

Comments on the Nigeria part of the proposal:

- The need for improved management of the Gashaka-Gumti and Yankari Protected areas, and thus helping preserve precious wildlife is imperative after years of good policies and intentions but neglect in funding and implementation. The areas have potential for nature-based tourism, although the tourism sector is not developed in Nigeria, neither in infrastructure, nor in terms of the quality of

the resorts or other infrastructure. The number of tourists visiting Nigeria, if you deduct Nigerians in exile visiting family or their country of origin, is negligible.

- The State of Bauchi is thoroughly committed at the political level to developing the Yankari Game Reserve and it has a great potential, while the Gashaka-Gumti seems also to have the same potential.
- Despite national policies to develop tourism in Nigeria a partnership between the federal government and the federal states is necessary, as most states depend on allocations from the Centre.
- The two projects are situated in areas where security concerns have to be addressed, and both federal and state governments have to commit themselves.
- The arrangements for co-financing from the Government have to be scrutinized as Nigeria is heading into its worst economic crisis since independence and has to make strict priorities as to what sectors should benefit from federal funding.
- The project, if funded, fits into the Government's overriding Economic Recovery Plan with diversification away from oil dependency at its center. Whether the tourism sector will be the quick money earner Nigeria needs can be questioned.
- The conservation perspective of the projects is strongly supported, the economic viability questioned.

Comments on the Bhutan part of the proposal:

- Given the current situation, we are particularly pleased to see that Bhutan is added to receive additional funds to increase access to employment, and income generating opportunities for communities affected by human-wildlife conflict.
- The COVID-19 pandemic has dramatically highlighted the need for more international cooperation, solidarity and multilateral solutions for safeguarding our common future. The project addresses highly relevant eco-tourism sector and that not only addresses local needs but also fulfills multilateral global agreements in the field of climate change, biodiversity conservation etc.
- Through the implementation of the project, one should be vigilant to see that there is no overlapping of various donor activities which can lead to corruption.

✓ **Germany Comments:**

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

Germany would like to compliment on the new child projects which are aiming at the reduction of illegal wildlife trade, taking into account demand- and supply-driven approaches, as well as strategies for reducing human-wildlife conflicts in a context-specific manner. They are based upon the analysis of major threats to the implementation of the NBSAP in the respective countries (poaching and illegal wildlife trade) and are therefore highly relevant.

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

- Germany would like to ask that term wildlife-based economy in component 2 (Promote Wildlife-based and Resilient Economies be defined clearly, since it could include unsustainable and illicit wildlife uses. The child projects in Bhutan, Nigeria and South Africa aim at fostering nature-based tourism or ecotourism. The term wildlife(-based) economy could therefore be either replaced by the term nature-based tourism or defined as sustainable and legal use of wildlife, based upon predefined standards.

✓ **India Comments:**

- In respect of the Global Bhutan, Malaysia, Nigeria, Pakistan, South Africa: GEF -7 Global Wildlife Program -Addendum, World Bank, UNDP/ IUCN/ UNEP (GEF Program Financing: \$16,922,937) (GEF ID: 10561), which includes a project pertaining to Pakistan titled Strengthening Governance and Capacity for Combating Illegal Wildlife Trade in Pakistan (with Total Project Cost (GEF grant) of \$2,652,294), the project includes a component that is proposed to be taken up in the Pakistan occupied Jammu and Kashmir, which is a part of India under the illegal occupation of another country and would prima facie amount to a violation of India's Constitution, sovereignty and territorial integrity. For this reason we oppose the project pertaining to Pakistan under the Program, and do not join the Council for approval of the said project. We oppose the approval of any component of the project to be taken up in the Pakistan occupied Jammu and Kashmir, which is a part of India under the illegal occupation of another country.
- We have also noted that all projects that are approved by the Council and endorsed by the CEO should be consistent with the GEF instrument and GEF policies and procedures. We would like to understand from the GEF Secretariat whether GEF has a specific policy regarding projects in disputed areas. If such a policy exists, we would like a confirmation that all the above projects are as per such policy. If such a policy does not exist, we would like to understand the impediment, if any, in GEF Sectt following the principles under the well-established World Bank Operational Policy on Disputed Areas (OP 7.60).

3. Global – (Bangladesh, Ecuador, Sri Lanka, Albania, Grenada, Indonesia, Jordan, Philippines, South Africa, Tunisia): Global Programme to Support Countries with the Shift to Electric Mobility – Addendum, UNEP/ ADB/ EBRD/ UNDP/ UNIDO/ DBSA (GEF Program Financing: \$20,118,605) (GEF ID: 10544)

✓ **United States Comments:**

- Within Bangladesh, we recommend additionally coordinating with the State Minister for Power, Energy, and Mineral Resources, and the Dhaka North City Corporation Mayor.

- Within Sri Lanka, there was very minimal reference to the project's stakeholders. We look forward to seeing much more clearly defined information on stakeholders and their engagement in the next stage of proposal development.

✓ **Canada Comments:**

- We recommend that there be some consideration to mitigating the environmental impacts of electric vehicles, particularly where facilities for managing batteries don't exist.

✓ **Germany Comments:**

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

Germany approves the addendum to the global programme that contributes to the adoption of e-mobility by strengthening the technical and financial capacities of countries and taking into account different local prerequisites and requirements.

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

- The introduction of e-buses to local public transportation fleets differs from other e-mobility forms, e.g. from heavy duty long-distance trucks, when it comes to technical aspects, charging infrastructure and the role of public / private investments. Given the unique involvement of public stakeholders in the purchase and operation of e-buses as well as the significant effect e-buses can have in terms of GHG-emission reductions in urban centres, this subject deserves a great amount of attention. Germany therefore proposes, that the significance of the acceleration of e-bus adoption be reflected in the program structure, by creating an additional working group focused on e-buses in public transportation.
- Germany welcomes that information exchange and knowledge management are a substantial part of the programme. We suggest establishing a close working relationship to the new TUMI (Transformative Urban Mobility Initiative) E-Bus mission. The "TUMI E-Bus Mission" follows a similar logic and approach in supporting cities in the uptake of e-buses. As the e-bus implementation in public transport is largely dependent on an involvement of city level decision-makers, the TUMI E-Bus Mission can contribute to the proposed programme by feeding in local perspectives and requirements.

✓ **Japan Comments:**

The below comments from Japan were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- On single-country projects, especially with large stated co-finance ratios, and cyclical-industry-related projects, such as Project 10564 (Environmentally Sustainable Development of the Iron and Steel Industry) and Project 10544 (electric mobility addendum):
- We anticipate that participants of these projects may be severely impacted by the COVID-19 crisis. How realistic are the published co-financing arrangements to be met, and for the industry to meet the higher operating costs - without de facto subsidization from the GEF?
- We would also like to stress the need for transparency and balanced involvement of private sector providers in any of these corporate projects (particularly highly cyclical sector projects such as the ones included in this work program in the steel and automobiles sectors), especially amid the COVID crisis, given that all such industry participants indiscriminately face severe business conditions. Projects should be carefully constructed and communicated, so that they are not deemed to infringe upon rules against subsidization of particular entities, thereby “reinforcing the market power of some targeted companies at the expense of other firms” (as per the rules). For example, “to de-risk investments in ...” in the project description/ objectives implies the potential of subsidization, highlighting the need for transparency in their construct and execution, so that they are visibly in line with GEF rules and regulations and the Private Sector Engagement Strategy to be adopted at this Council session. This type of crystal-clear communication/ governance-insurance measure is essential for the GEF to credibly raise funding for private-sector-driven projects in a tough financial environment.

4. Global: Common Oceans - Sustainable utilization and conservation of biodiversity in areas beyond national jurisdiction, FAO/ UNEP/ UNDP (GEF Program Financing: \$26,719,744) (GEF ID: 10548)

✓ **France Comments:**

- This program is the second phase of the GEF-5 Global Sustainable fisheries management and biodiversity conservation in the Areas Beyond National Jurisdiction (ABNJ) Program, which was implemented between 2014 and 2020 and coordinated by the FAO with support from UNEP and the World Bank.

The main outcomes pertained to regional capacity building in fisheries management and the establishment of areas to be protected, *Vulnerable Marine Ecosystems (VMEs)*:

Improving tuna fisheries, Raising awareness on ocean issues (including 44 Representatives from 34 countries received training on the BBNJ Process through the Regional Leaders Program, connecting fisheries and environmental communities, etc.), Protecting marine life, Safeguarding vulnerable ecosystems (New protocols enabled all eight deep-sea RFMOs to do fishing impact assessments on potential VMEs, More deep-sea habitats and species, such as corals and sponges, now protected following the designation of 18 new VME sites, Tools for tackling illegal, unreported and unregulated fishing.

- As was the case in the first phase of this program, the GEF-7 Common Oceans - Sustainable utilization and conservation of biodiversity in areas beyond national jurisdiction program focuses on “sustainable fisheries management” and capacity building for regional actors (including regional seas agreements) and sector actors (including regional fisheries organizations), in connection with the process for the negotiation of a legally binding tool to conserve biodiversity in areas beyond national jurisdiction (BBNJ). This process is in the negotiation stage (or has perhaps been completed), thereby justifying the leading role of the FAO, which is implementing a significant portion of the program in conjunction with UNDP, UNEP, and other agencies such as WWF US and CI.

The Program focuses on four areas: (i) strengthening governance and management including frameworks, processes and incentives; (ii) increasing capacity for more sustainable fisheries through greater implementation of the ecosystem approach; (iii) building capacity to better coordinate and engage in multi-sectoral processes; and (iv) improving knowledge and information sharing for better decision-making.

We strongly endorse the issues covered in the program (creation of enabling environment to deliver a series of transformative changes that will lead to more sustainable and integrated use and management of ABNJ resources, etc.), which were also included in the FGEF strategy for 2019-2022. We also approve of this support initiative for the BBNJ process, which is undoubtedly unique in scale. We nevertheless believe that a broader focus on “management tools per area” (phrasing used by the negotiators owing to a lack of consensus on “high seas MPA”), conserving biodiversity and not only fisheries in the coming years, is critical. It is covered in only one of the five child projects (Sargasso sea - see below) and, to a lesser extent, in the cross-cutting capacity-building project.

- This program consists of five child projects: one covering overall technical assistance (TA) for the program, two relating to fishing (including a highly innovative component on the link between CC and fisheries: Predicted impacts of climate change on tuna and their fisheries in the Pacific), a fourth on capacity building and collaboration between BBNJ actors and the last one in a pilot area, the Sargasso Sea. The latter two programs are of particular relevance to us.

- Child Project: Strengthening the stewardship of an economically and biologically significant high seas area – the Sargasso Sea
- We support this project that is co-financed by the FGEF (we have confirmed that FGEF co-financing considered in the GEF description takes only the share allocated to the Sargasso Sea pilot area into account):
 - It bears noting that the objective of the FGEF-financed project is broader in scope: contribute to the conservation of biodiversity and ecosystem services in sensitive high seas areas—the Sargasso Sea and the Thermal Dome. This Thermal Dome component will put implemented activities in perspective.
 - In addition, the FGEF project includes a capacity-building component aimed at strengthening and organizing knowledge sharing between both areas and helping to put in place hybrid governance models with support from BREST university, which will be highly complementary to the Child Project Building and Enhancing Sectoral and Cross-Sectoral Capacity to Support Sustainable Resource Use and Biodiversity Conservation in Marine Areas Beyond National [sic]. Component 4 of the project provides for the development and implementation of a training program on governance and conservation in marine areas beyond national jurisdiction targeting the international scientific community, public officials, and private sector individuals, and the development of a trilingual (French, English, and Spanish) MOOC on governance and conservation in marine areas beyond national jurisdiction.

✓ **United States Comments:**

- Regarding the Sargasso Sea child project, we appreciate the effort to better understand and improve cooperation in the Sargasso Sea area. However, we are concerned that the project calls for the review of stewardship and governance options (both existing and potential) before the other elements of the project are executed, primarily: (1) Improving the knowledge base to support Ecosystem Based Management; and (2) Identifying the impacts of stewardship and conservation actions. To do any kind of review, one should have the underlying baseline information available first.
- We are also concerned by how the project muddles terminology such as “governance, stewardship, and management” in a manner that could lead to the inference that the project is designed to establish a broad new governance regime -- which the U.S. could not support. The project should focus on opportunities to improve coordination and cooperation amongst institutions and partners in the region as well as improve the functioning and operations of the Sargasso Sea Commission.
- We are strongly supportive of the other child projects in this Program, as evidenced through our in-kind partnership (via NOAA Fisheries) in Phase I. We anticipate that our mutual support in these areas will continue through Phase II. The two coordinating-themed projects in particular seem well aware of the processes that will influence the project, as well as the dynamics of the

processes the projects are trying to influence themselves. However, there were somewhat limited opportunities for stakeholder consultation and involvement in Phase I of the project that we hope can be improved upon moving forward.

✓ **Canada Comments:**

- We recommend adding add a line to the description of the project alluding to the negotiations process, along the lines of:
- “Additional projects may be considered in light of the Agreement on Biodiversity of Areas Beyond National Jurisdiction (BBNJ) currently under negotiations at the UN.”
- For the deep-sea fisheries child project, the suggestion that the project will “support the transition from traditional single-species assessments to multi-species ecosystem frameworks” is somewhat concerning. Ecosystem frameworks are important and can yield new understanding, guide policy, management, etc. but it is important that the shift in framework incorporates and links to single-species work, and does not replace it.

✓ **Norway/Denmark Comments:**

- The project document points out that around 12% of the global fish catches are caught in the high seas. This does not make the catch insignificant but shows the importance of responsible management within the EEZs. International legal obligations need to, as noted in the project document, be integrated in national legislations, but the project does not seem to address this major obstacle.
- Many Regional Fisheries Management Organisations need strengthened capacity development. Historically industrialized countries have benefited from exploration and exploitation of the high seas, whereas poorer countries have lacked the means to invest in larger fishing vessels etc. The duty to document the sustainability of fisheries and other activities, although obviously necessary and supported, can become a barrier to poorer countries who lack both financial resources and research vessel capacity. Sharing data and research findings through regional arrangements can be a way of reducing the barrier. It is not provided any overview on how the current catches are distributed between developing and developed countries (who are the largest fishing nations in the high seas?).
- In paragraph 14 it says that “Globally, it is estimated that 33 % of marine fish stocks are currently overexploited and 60 % are considered fully utilized, meaning that 93 % of stocks have limited or no potential for increasing production (FAO, 2018).” The FAO Fisheries Symposium in 2019 presented research showing the potential for growth in better regulated fisheries. Stocks can be rebuilt through strict regulation, so it seems misleading to state that “93 % of stocks have limited or no potential for increasing production”. The State of World Fisheries and Aquaculture 2018 (SOFIA) operates with the term “fish stocks that are within biologically sustainable levels”. In 2018 this category is 66.9% of global fish stocks.

✓ **Germany Comments:**

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

Germany approves the proposal for a global program that contributes to addressing barriers preventing effective governance and management for sustainable use of ABNJ natural living resources, especially, but not limited to, sustainable fisheries management and marine protective areas globally, but asks that the following comments be taken into account.

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

- Outcome 2.1: Germany asks to include IMO's International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V with reference to the FAO Voluntary Guidelines on the Marking of Fishing Gear (2019).
- Germany welcomes the overview on women in fisheries (Para 3. Gender) and the use of core indicator 11 of direct beneficiaries disaggregated by gender. In addition, Germany asks to include an indicator on the level of women empowerment to be reached and to specify the support for gender equality and equity in accordance to the four program components and the child projects.
- Germany asks to add an exit strategy for the proposed GEF-7-ABNJ in case there is no further funding under future GEF programs, with reference to the GEF-5 Program (line 150).

✓ **Switzerland Comments:**

- We strongly support this program and have just a few comments:
 - We request that the program be fully aligned with the BBNJ negotiations and it should also mention them in the context of program.
 - Please further specify how 12 million hectares of marine protected areas will be concretely improved in particular in light of the lack of a global regime to define marine protected areas.
 - Please further elaborate how safeguards to avoid any loss of biodiversity will be developed as part of the sustainable management of tuna and deep-sea fisheries component.
 - It is unclear to us how the cross-sectoral collaboration and governance will be improved as part of the program. Please further specify.

5. Global – (Bolivia, Congo, Ghana, Honduras, Madagascar, Nigeria, Suriname, Uganda): Global Opportunities for Long-term Development of artisanal and small-scale gold mining ASGM) Sector Plus - GEF GOLD +, CI/ UNIDO/ UNEP/ UNDP (GEF Program Financing: \$43,832,830) (GEF ID: 10569)

✓ **France Comments:**

- France supports the GOLD+ program, which addresses a number of areas of concern for France.
- For information purposes, the FGEF is co-financing, for example, a project that is being implemented by the WWF in the Guyana Plateau (Guyana, Suriname, and French Guiana). This project aims to reduce the use of mercury in gold mining.

✓ **United States Comments:**

- We are encouraged to see the GEF's continued support of ASGM work and have several comments on the GEF Gold + program, intended to improve implementation.
- Within the Suriname child project, we would like clarity on the significant discrepancy between the cited amount of total annual mercury release from ASGM (0.086 MT) and the project target of reducing Hg use by 6 MT over 4 years.
- Also, in Suriname project, in the next iteration of the child project we would like to see coordination with the U.S. Department of State project also working on ASGM and mercury-free technologies.
- Within the Republic of Congo child project, the executing agency is the Basel Convention Regional Center in Dakar, Senegal, justified by its expertise in implementation of chemical conventions. We are concerned that the proposed executing agency is not in-country, and additionally has very little experience with Minamata Convention nor with ASGM, or with biodiversity, the other focus of this program. We would like to understand better the choice of this executing agency, and what alternatives exist.
- Within the Nigeria child project, the executing agency is also the Basel Convention Coordination Center for Africa Region. While they are at least based in Nigeria, we have similar concerns as above about their suitability for these issues, including if they have the contacts or substantive understanding of the ASGM sector to effectively manage the projects. We understand the EU is supporting an effort across Africa to build capacity in the small-scale mining sectors, especially of the geological survey agencies. This may be a more effective way to make progress on mercury in ASGM.
- Within the Madagascar child project, the project includes \$2 million of recurring expenses from the MEDD. It is our understanding that their budget

has recently been significantly downsized, and we would request confirmation of this support in the next iteration of project development.

- Also, within the Madagascar child project, we would like further information in the next iteration of the project on the justification for selecting GIZ as a basis to build on. They are mentioned as an “excellent basis for the proposed GOLD+ Madagascar project to build on”, since GIZ has a very small-scale mining component under their Programme d’Appui à la Gestion de l’Environnement or PAGE Programme. However, we understand that GIZ does not cover all the areas that will be covered by this project and have a distinct domain of expertise and experience than this project, namely in fair-trade affiliated very small-scale mining.
- We look forward to greater clarity on CSO involvement in the next iteration. This will also be critical, given ongoing efforts at mining code reform in Madagascar. CSOs were very active during the government’s efforts to reform the mining code at the end of 2019. Related, are there planned contributions from this project to ongoing efforts for mining code reform, and/or considerations for the potential implications of reform for the implementation of this project?
- Finally, in the next proposal iteration, we would like to better understand the relationship between the proposed activities and the MECIE (Mise en Compatibilité des Investissements avec l’Environnement). We understand that the proposed activities are subject to environmental impact study and approval of an environmental commitment program, subject to this decree, but did not see this referenced within the project documents.
- The child projects for Congo and Uganda should coordinate with current gold formalization and supply chain efforts by the International Conference on the Great Lakes Region (ICGLR), of which both Uganda and Congo are members. <http://www.icglr-rinr.org/index.php/en/>. The ICGLR was also instrumental in the establishment of the OECD Due Diligence Guidance, which is a key supply chain component for this program. Up to this point, there has not been much focus on mercury in the PPA, mostly due to lack of funding for the specific issue. We strongly encourage coordination with this strong Partnership working on ASGM in this region of Africa, and further encourage coordination with USG partners (State, USAID, DOL) that fund and participate in a Public-Private Alliance (PPA) for Responsible Minerals Trade in the ICGLR.
- Overall, for Program component 6, Global coordination, knowledge management and outreach, there seems to be a lack of focus on the private sector gold buyers and users. Large companies (refiners, jewelers, electronics) can benefit from GOLD+ data and other insights as they increase implementation of gold sourcing due diligence programs. If this program can better consider and be sensitive to ongoing private sector due diligence policies and programs, then the program’s sustainability can be greatly amplified. Eventually, funding for these types of projects, and demand for responsible mercury free gold, will come from the downstream supply chain.

- A related supply chain concern is that in our view, the current program potentially hides supply chain issues under the “lack of access to finance” heading. While they are related, lack of access to finance is not completely a supply chain question, and vice versa. Critical supply chain issues that should be considered include transparency, customs and trade, consumer demand (how do we mainstream responsible gold for the final consumer), responsible production, and coordination with company due diligence measures (OECD DDG). To couple these supply chain issues with another large issue like access to finance dilutes the importance of both of these barriers.

✓ **Germany Comments:**

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

Germany welcomes the proposal which is considering the main problems in the artisanal and small-scale gold mining ASGM sector and addresses them with respect to finance mechanisms (program component 2), technological support (component 3) and capacity building / knowledge management (components 1,4 and 5). The reduction of 280 metric tons of mercury use would be a substantial achievement.

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

- To monitor the outcome additional environmental parameters could be added such as monitoring the mercury concentrations in fish and/or along the food chain in the affected areas.
- Education institutions appear in the Sources of Co-financing but are not specifically mentioned as stakeholders. Please include them.
- Synergies with other institutions could be enhanced, e.g. with the International Sustainable Chemistry Collaborative Centre (ISC3) in Bonn, as well as with German educational institutions like Beuth University of Applied Sciences, Berlin. The latter offers online education/capacity building (in English and Spanish language) in the field of the Minamata convention including ASGM, which is crisis resilient even in times of corona virus lock-downs and travel restrictions.
- To include the international multi-stakeholder working group on Women and Mining (www.womenandmining.org) as a global knowledge-sharing partner on gender aspects of the proposal.
- Further Synergies could be enhanced with the German Federal Institute for Geosciences and Natural Resources (BGR). The BGR cooperates with the MEM in Uganda with the goal to formalize the ASM gold sector in the context of the International Conference of the Great Lakes Region Gold Strategy; this cooperation includes also sustainability aspects, such as reduction of mercury

use in gold mining. The BGR has also contacts in Honduras with Inhgeomin and the mining cooperative in Macuelizo.

- In Madagascar, apart from the BMZ/GIZ PAGE project already mentioned further synergies could be generated with the ProDéCID project. The ProDéCID project works on anti-corruption at national scale as well as on community development (community service, finance and local economic development) in the regions Analamanga, Boeny and DIANA in Madagascar. GER therefore kindly asks to consult the PAGE and the ProDéCID project during the further project preparation phase.
- In addition, the project proposal points out on page 9 that there is a Co-Finance/ grant investment of 8,631,495 USD from GIZ's PAGE project. This information is incorrect. GIZ PAGE is not a donor of the upcoming project, but the implementing agency. Therefore, GER kindly asks to list the Federal German Ministry for Economic Cooperation and Development (BMZ) as the donor agency with the GIZ as the implementing agency.
- In Honduras, the German Civil Peace Service (CPS) works on environmental conflicts and might be a relevant stakeholder/partner for cooperation.
- In Uganda, the BMZ/GIZ project Responsible Fisheries Business Chains Project (RFBC) is interested in cooperating around the issue of tracing mercury in fish in Lake Victoria.

✓ **Switzerland Comments:**

- We welcome this program, but it is unclear to us, how the lessons learned from the GEF GOLD Program were included in the design of the GEF GOLD+ Program. Institutional Learning is key to us, so could you clarify how this program builds on the lessons learnt on AGSM in particular from the GEF GOLD Program so far?
- Page 16, Para 41: It is estimated that nearly 100% of all mercury used in ASGM is released into the environment (Global Mercury Project, UNIDO 2007). Is there no more recent literature you could quote for this?
- Page 17, Para 44: the access to finance for the transition to mercury free practices in the ASGM sector is a key challenge in particular in the informal sector, but it is unclear to us how GEF GOLD+ will tackle this challenge after the GEF GOLD program has already addressed this challenge and was not fully successful.
- Component 2: Please further clarify more specifically which concrete measures will be taken to include responsible supply chains and traceability in the program, since we consider them as key.
- Please further elaborate how you will ensure the sustainability of the program. The information contained is very limited. Please e.g. add an element on institutional strengthening, since we consider this to be crucial for the sustainability of the program. Governments often do not issue any regulation for

ASGM or issue last minute regulations which often leads to an even larger illegal / informal ASGM sector. Institutional intermediary steps and well thought through policies are key for the long-term success.

- Could you clarify what will happen with the mercury still in use at this stage and the various mercury waste stocks in the ASGM areas of the recipient countries of the program? Where will the mercury waste be treated and by whom? Who will transport it? The treatment of the waste is key to ensure that the mercury intake to the environment will be avoided / limited as much as possible.

STAND-ALONE FULL-SIZE PROJECTS

NON GRANT INSTRUMENT

6. South Africa: Wildlife Conservation Bond (NGI*), World Bank (GEF Program Financing: \$13,761,468) (GEF ID: 10330)

✓ France Comments:

- Interest in supporting innovative financing mechanisms. The rhino impact bonds serve as a benchmark. N.B.: It must be ensured that rhino horns are not traded. Several countries, including South Africa, are calling for the legalization of the trade of farmed rhino horns. France and most of the other Parties to CITES are opposed to this request in the current context, in light of the impact of such an action on the rest of the market and the risks of mixing with poached horns.

✓ Germany Comments:

Germany supports the idea of using innovative conservation financing approaches to achieve conservation and sustainable use of biodiversity.

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

- In order to be able to assess feasibility of this project, we would like to request that the proposal includes more information about how the envisaged bond shall be established and will work. In particular, we would like to request information on how conservation is achieved through the bond initially and throughout the project (how does the bond trigger conservation efforts and how are investors activated to invest in the bond), including indicators and specific outcomes to be achieved.
- In addition, Germany would like to see information on how far the communities located at the borders of the two envisaged National Parks will benefit from the bond. While the proposal describes that an assessment of these communities

will be done, it is not clear whether the communities will have a share in the bond and whether an empowerment of the communities will take place.

✓ **United Kingdom Comments:**

- Kenya – This is the Species Conservation Bond project. This has been developed with support from the IWT Challenge Fund. The UK is looking closely at this project.

✓ **United States Comments:**

- The United States request that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- This innovative project merits support and can ideally become a proof of concept demonstration. In subsequent or related proposal drafts we would like greater clarity on the reward structure for communities adjacent to conservation areas. It appears that communities will be rewarded if black rhino populations grow over the five-year period, however the mechanism for this is not developed. Will they be the bond holders? Will private and philanthropic entities buy the bonds on their behalf?
- The gender elements seem relatively under-developed.
- Is the funding generated by this mechanism specifically dedicated to black rhino conservation or rather to overall park management? Especially if the latter, are there any concerns that determining financial returns based on the performance of a single (albeit important) species might lead to tradeoffs in park management decisions or allocation of effort that negatively impact other species?
- Are rhinos in these parks censused or sampled? If the latter, are there any concerns about incentivizing overestimates of rhino populations?

7. Global: IFC-GEF Greener Shipping Investment Platform (NGI*), World Bank (GEF Program Financing: \$13,500,000) (GEF ID: 10501)

✓ **Canada Comments:**

- The Barbados port is working to re-tool to support a greener shipping industry; we would recommend notifying them of this work, as there may be opportunities for knowledge sharing.

✓ **Norway/Denmark Comments:**

- The initiative addresses relevant issues facing the health of our oceans. Norway has taken a prominent role internationally in working towards greening the shipping sector. Greener shipping is an important goal and the ambitions for the shift to low carbon solutions is set by the International Maritime Organisation (IMO). Shipping is a capital-intensive commercial sector, and with an overweight of market owners from developed countries. The companies in this sector will gradually be forced to reduce emissions if the IMO regulations are implemented.
- The rationale behind establishing a fund is well understood, but we question to ODA eligibility of supporting a non-targeted funding mechanism. This should be checked.
- An obstacle in the shift towards greener shipping is technological and related to infrastructure. Investors hesitate to “bet on the wrong horse” and choose a technology that will lose out in the long run. There must be enough demand for international ports to provide the different types of greener fuel and new technologies, and green ports that can provide electric shore power to reduce emissions.
- As this initiative appears to be a developed country-based coalition it must not uneven the playing field, i.e. have an unintended effect that developing countries might lose out commercially, if they don't have the means to mobilise similar financial help. Any initiative financed with ODA funds should not encourage an uneven playing field within any sector (between developed and developing countries). The financing mechanism should be sensitive to ensure an even playing field and ensure that developing countries, who already have an insignificant share of international shipping, do not lose out.
- We hope that the WB will strategically link the initiative to earlier and ongoing efforts by the IMO, such as the Green Voyage 2050. We believe IMO will bring a lot of expertise, both regulatory and technically, into the work which will benefit the Greener Shipping initiative. We would like to emphasise the importance of sharing learnings / best practices of such an initiative with the wider maritime community. Sharing of information is crucial to catalyse further investments into low carbon solutions and to bring developing countries to the table.

Comments on the funding mechanism:

- The PIF states that no similar funding mechanisms exist. The reason for this is mainly because of the misaligned incentives between shipowners and charterers. This mechanism appears to be a good solution that aligns incentives (fuel-savings is being captured by shipowners and charterers do not pay for the retrofitting). Another impressive aspect is the private sector engagement. Cargill, Maersk, and Mitsui are all major maritime actors and highly relevant for this joint venture. Support from these major actors should be viewed as notable.

- The Platform appears to be underdeveloped and not yet operational. A commitment from GEF should be contingent on the platform is operational and has sufficient systems in place to manage contributions.

Timeline: referring to the project documents, it appears that this vehicle is still under development. What is the timeline until the Platform can disburse funding? Have the investment targets already been identified?

Ownership: This Platform is a joint venture between IFC (+ investors) and private sector (Cargill, Maersk, Mitsui). Is the private sector motivation financial or concessionary in nature? Will the Platform be profit driven?

Pipeline: The project document mentions that Cargill will provide access to its extensive chartered fleet. Will the fund only retrofit Cargill vessels? How do we ensure impartiality and conflict of interest?

Management: It is unclear how the management of the Platform will be.

Costs: It is unclear what the transaction, execution, and operational costs of the Platform will be.

Target return: 8-15% IRR on self-liquidating instruments seems excessive (especially since the investment is denominated in USD and GEF is not taking on FX risk). The investment products and the risk level need to be better explained.

Platform life: the fund life is 10 years. Given that the Platform is self-liquidating instruments, then the project could be structured as an evergreen fund (no end date). An evergreen structure might be more benefitting as it allows more flexibility for investors to enter and exit.

Agreement: Has the agreement between shipowners and charterers already been agreed?

✓ **Germany Comments:**

Germany requests that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement.

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

- Germany requests increased environmental ambition aligned with the PA and exceeding BAU retrofits and existing legal environmental requirements (additionality). Germany also requests explanation of the calculation of the targeted emission reductions in CO₂ and further GHG emissions. Germany further requests clarification on which technologies are to be used and an assessment of the project's transformative impact on the global ship fleet. The eligibility criteria for supported investments should include a benchmark to be

achieved (e.g. emissions per ton of cargo within the top 10 % of the most efficient ships available in its class) and a mechanism to prevent old ships, which would normally be replaced by highly efficient new ships, from simply being overhauled.

- Germany demands that the project design meets eligibility criteria regarding project beneficiaries by ensuring that a significant part of the investments benefit developing countries, e.g. by contributing to meeting their NDCs. Furthermore, the number of beneficiaries as well as the gender-responsive approach require clarification.
- The role of Maersk Tankers in this project requires clarification, for example why technologies and expected fuel savings have to be validated and approved by Maersk Tankers and how Maersk Tankers foresees to validate technologies and technology packages. It should be explained how distortions of competition resulting from the project are to be avoided.
- In light of an estimated high leverage ratio (namely 1:10 and more) and “attractive financial terms” outlined in the project description, Germany would welcome further explanation and analysis on potential deadweight-effects caused by GEF’s financial contribution and the platform’s capital structure. (e.g. waterfall structure and risk exposure).
- Germany suggests that biodiversity aspects be integrated in the eligibility criteria and concept for the investment platform, such as avoidance of migratory routes for marine mammals, reduction of inadvertent carriage of invasive species, etc.

8. Global: AGRI3 A Forest Conservation and Sustainable Agriculture Fund for Developing Countries (NGI*), CI (GEF Program Financing: \$13,461,468) (GEF ID: 10497)

✓ **United States Comments:**

- It is unclear who is offering the training for farmers that it lists as an outcome. The development of partnerships with training implementers, including government training institutes, is key, as farmers may not request loans for sustainable agriculture projects unless they are trained in what these projects look like and how to run them.

✓ **Norway/Denmark Comments:**

- The AGRI3 fund is highly relevant. It will be impossible to reduce global deforestation if the private sector does not involve, commit and follow up on their commitments. The AGRI3 fund offers funding options for otherwise non-commercial or highly risky projects with a sustainability profile, actively aiming at preventing deforestation; stimulate reforestation; contribute to efficient sustainable agricultural production and value chains; and reduce carbon

emissions and improve rural livelihoods. There is a high demand of this kind of risk capital, but still not many providers as of today.

- The geographical focus of the Fund is middle income and lower income countries. The fund will initially work in Brazil, Indonesia and India. Other regions will also be considered. Countries with significant progress under the REDD+ mechanism will be a priority for investment. We agree with this form of gradually expanding the coverage of the Fund. DRC and Congo Brazzaville are explicitly mentioned as an issue because of political risk assessment. This is well understood. However, we encourage the Fund to look at the possibility of considering these countries in a few years' time, especially if the political risk level changes, given their importance in terms of tropical forests. We also encourage AGRI3 to consider Gabon, a country that qualifies in terms of significant progress under the REDD+ mechanism.
- We would like to see that the AGRI3 Fund cooperate and to coordinate with the &Green Fund to the extent possible and when relevant.
- Risk of leakage: when forest protection, conservation- / deforestation-free agriculture induce deforestation in other areas. This is dealt with by the AGRI3 in terms of monitoring the surrounding forests of a supported agricultural project. However, we recommend expanding more upon this form of risk and explaining how increased deforestation as a result of leakage will be dealt with by the Fund.

Comments on the funding mechanism:

- Financial reflows: The fund is structured into various asset classes that have different return profiles. Given that AGRI3 has requested the GEF for senior participation (target net IRR 5%); how will reflows be treated?
- Investment class: AGRI3 has requested the GEF for senior participation (3rd loss). Which asset class does the Project Team recommend GEF invest in? As opposed to “capital preservation (1st loss; 0% ROI)” or “junior participation (2nd loss)” which can be argued have higher risk profiles.
- Guarantee experience: one of the main products will be issuance of guarantees. Does the investment advisor have a past track record with guarantee products?
- Team experience: does the team have enough capacity in the thematic and geographical areas that the fund will be investing in? What assessment has been done in relation to the investment advisors' capacity and capabilities?
- Execution cost: the remuneration/fee structure is very opaque. Please clarify.
Governance: There is no mention of what role the GEF will take in the governance structure. This should be highlighted.

✓ **Germany Comments:**

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

Germany would like to acknowledge the relevance of the proposed objective and components as well as the detailed description of the financial mechanics.

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

- Regarding p. 17/p.39: CO2e Emission Reductions – please clarify ER estimates – ER from reduced deforestation or land use conversion cannot be simply increased/extrapolated for longer time periods since the baseline has to be adjusted over time (and deforestation of a specific area is only avoided once).
- Regarding p. 17: use of Mton for metric tons should be corrected.
- Clear Safeguard needed for deforestation free supply chains (p.31) – it has to be ensured that invests don't take cause deforestation but also that it does not take place on recently deforested areas (last 5 years) - integrate in Outcome 1.2.
- The steering structure is not fully clear: Senior Investors, i.e. GEF should be represented in the Investment Board. It would be recommended to have a Civil society observer in the steering structure.

✓ **Switzerland Comments:**

- We generally support this progressive initiative, in particular the ecosystem-based approach it follows.
- We believe the AGRI3 concept to build forest protection, reforestation and sustainable management into agricultural loans from the standpoint of risk is very sensible. Exactly for this reason, we would welcome if the aspect of climate change adaptation and resilience of landscapes as a function of forests and trees outside forests would be added to the proposal to further strengthen it.
- We would prefer if a larger part of the funding would be more focused on forests instead of agriculture. Currently agriculture receives the lion's share of loans and credit in developing countries, whereas credit for forests is absent or at best exceptional. So we believe it would be appropriate for GEF to increase the de-risking of agriculture through supporting mainly the forest component of the ecosystem and targeting these activities.
- It is not clear to us how funds will be channeled to forest activities through climate smart agriculture. Climate smart agriculture is not conceptually associated with any of the three mentioned forestry activities. Please further specify how the forestry activities will be associated with climate smart agriculture.

- The environmental benefits related to land degradation could be phrased positively as ecosystem restoration and fit more closely to the policy goals of the UN Decade on Ecosystem Restoration.
- Further, since the essence of this Fund is to address risk in agricultural and forest supply chains and investment, resilience or CC adaptation should be added.
- We welcome that the issue of native species is addressed in the project proposal and we fully support their use. However, we think it should also be mentioned that species should be selected on the basis of their resilience as well, and genetic provenance from more extreme environments should also be added to the selection criteria.
- Please further specify how much of the funding will be targeted for smallholders, including addressing land tenure since this directly affects sustainable land-use. How much of the funding of this project will be allotted to large-scale agriculture?

9. Global: Livelihoods Carbon Fund 3 (LCF3) (NGI*), CI (GEF Program Financing: \$13,461,468) (GEF ID: 10500)

✓ **Norway/Denmark Comments:**

General comments:

- The project is highly relevant, and we support the overall ambition of the program. Nature-Based Solutions have a vital role to play in addressing the causes and consequences of climate change.
- Building on the Livelihoods Carbon Fund 1 and 2 existing portfolio of projects seems appropriate and efficient, while also considering investing in new clusters such as REDD+ projects. We urge that experiences and lessons learned from existing and past efforts are built upon.
- In order to address the drivers of deforestation, it is not sufficient to prevent deforestation at the project level. REDD+ should be implemented at national scale- or sub-national scale as an interim step in line with the Warsaw Framework. However, recognizing that there are projects operating within landscapes at the larger scale, it is important that these projects are nested within jurisdictions in a manner that ensures high environmental integrity.
- There is potentially high risk of further loss of biodiversity when new areas are being put into agri-production and forest areas become more accessible. The project needs to integrate the capability to closely monitor leakage in respect of biodiversity conservation, as unsustainable activity can easily be initiated on unprotected areas. Investor and investee commitment to zero-deforestation clauses is recommended.

- Land tenure and land rights need to be addressed, and close adherence given to both former and future rights of community land after a concession agreement has been signed.
- Meeting market demands in terms of productivity and a focus on commercial crops should be properly balanced with the need for protecting biodiversity and ensuring local food security.

Detailed comments:

- What are the expectations of the beneficiaries? How soon will they expect return for their effort? This should be clarified to avoid potential conflicts or lack of engagement by the beneficiaries. This is particularly relevant for restoration and conservation of endangered terrestrial and marine natural resources in which expected return may take several years.
- What is the system for benefit sharing? How will the profit be shared to ensure that it is accessible to all? We recommend adding a description of this in the PFD.
- The risk assessment is rather short considering the complexity of the project. The project should consider adding more risk elements. For example, there appear to be no assessments of unintended effects by the project on anti-corruption and human rights. We urge the project to assess the likelihood and severity of these issues.
- For indicator 1.2.1-1.2.5 there should be identified clear criteria for what is meant by deforestation, wetland, sustainable agriculture. Some of the indicators also seem challenging to measure, such as avoided CO₂ eq and number of people with lower exposure to health hazards and injuries. We underline the importance of measurable results to be able to manage the project.
- Nesting with high environmental integrity will be secured through the following:
 - The approach of setting the reference level must be the same for each project within a jurisdiction and must be coherent with the reference level at jurisdictional level.
 - The estimated emissions should include the same carbon pools, emission factors, activity data and methods across the nested geographies as in the jurisdiction.
 - In order to generate results in the form of emission reductions at the project level, the jurisdictional level also has to generate ERs. This entails a risk for project developers, but ensures national REDD+ strategies with environmental integrity, in line with international frameworks and mechanisms.
 - The projects must have approval from the jurisdictional level to sell emission reduction credits. ERs must be recorded in a registry and

subtracted from the total emission reductions available at the jurisdictional level in order to avoid double counting.

Comments on the funding mechanism:

- Financial return for the fund is provided by private and public off-takers that pay fees to benefit from the public goods and externalities created by the project. The GEF will be repaid in cash after the carbon credits are sold. This model is an innovative solution; however, it is dependent on off-takers honoring its commitment to pay for their benefits.
 - **Guarantee:** The DFC of USAID has issued a USD 15m guarantee. This guarantee will be used as a credit mitigation instrument for private investors. This is very positive and will likely help mobilize additional capital from private actors.
 - **Fund performance:** This is LCF's 3rd fund. Has there been an analysis of Fund I & II 's track record to date? Have the funds delivered cost-efficient results?
 - **Governance structure:** The capabilities and experience of the IC, BOD, and management are unclear. It should be clarified who is represented on the IC and the BOD.
 - **Private sector investors:** Is the private sector motivation financial or concessionary in nature? Will the Platform be profit driven? How do we ensure impartiality?
 - **Current pipeline:** LCF3 will invest in projects from LCF1 and 2. Have the projects that LCF3 will be investing in been performing well? Are they in critical need of extra funding? Is topping up these projects best use of GEF funding?
 - **Return:** Financial return for the fund is provided by private and public off-takers that pay fees to benefit from the public goods and externalities created by the project. Have these actors been identified? The business model (ability to generate a return) relies on these actors pay the fees to the fund, which in turn provide a return to the investors.
 - **Key risk:** Off-takers not honoring agreement to pay for benefits. This will inhibit LCF3 to pay returns to the investors and the model loses its integrity.

✓ **Germany Comments:**

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

Germany welcomes the proposal to create an innovative financing mechanism that will engage the private sector in the restoration of natural ecosystems and to promote agroforestry while increasing the area of conserved natural ecosystems and avoiding deforestation.

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

- Under project objectives, the GEF contribution is given as a lump sum (\$13,461,468) rather than divided up by project outcomes. Germany suggests to re-structure the project objectives table in order to assign costs to the respective outcomes in order to provide clarity about the use of resources. Related to this, more details about what exactly GEF funds will be used for (beyond de-risking investment) would be helpful to better understand the GEF contribution.
- The LCF3 investment model is based on generation of carbon offsets for corporate investors in order to compensate their carbon footprints. A fundamental risk of the scheme is a double counting of the compensations by the corporate investors and the countries where the GHG reductions are made. Germany suggests reviewing and verifying the risk of double counting of the intended investment model by considering the need for bilateral agreements between project host-countries and the GEF.

BIODIVERSITY

10. Bosnia-Herzegovina: Improved Financial Sustainability and Strengthened Resilience of Protected Areas Through Development of Sustainable Recreation and Partnership with Private Sector, UNDP (GEF Program Financing: \$2,640,000) (GEF ID: 10344)

✓ *Canada Comments:*

- We have noted that there is no mention of ‘Other Effective Area-based Conservation Measures’ (OECMs) in the short description – we would like to clarify whether this project covers or links to OECMs.

✓ *Germany Comments:*

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

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

- Management of protected areas in the country requires solid and long-term financial resources. In order to achieve outcome 1 (“managerial capacities in place”) it would be important to ensure that financial resources are allocated long-term. Tourism activities could therefore be complemented by more steady sources of financial support. In addition, the project could target harmonizing governance structures of protected areas with a view to using resources more efficiently.
- The proposal already highlights the different governance structures and responsible authorities in the country. As such, it would be important, that full

ownership is guaranteed on all levels of governmental involvement. A top-down approach from higher authorities to the local level is essential in the complex governance structure in the country.

- The proposal would further benefit from a more detailed description on how partnerships with private sector are going to be set up and maintained. Since private sector partnerships are one of the main tools to achieve the project outcomes, it could be considered to include other businesses than concessioners.
- Germany would further like to suggest that the project seeks collaboration with existing projects in the region such as the EU4Business project which supports sustainable tourism development in the country.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- It is unclear why increasing sphagnum moss cover is presented as a key ecosystem restoration element, as this indicator seems relatively distinct from sustainable tourism.
- While illegal development in protected areas is cited as a primary reason for loss of ecosystem services, it is not obvious how the project would deal with that other than maybe building legal tourist facilities. We would like to see greater justification as to why this driver of biodiversity decline is not dealt with within the project, or inclusion of activities to slow or reverse this driver.
- The Ramsar sites are mentioned, but it is not clear how the project efforts would support the BiH's obligation under the Ramsar convention to maintain the ecological character of the sites. Alternatively, it is also not clear how Ramsar implementation would support this project. Taken together, while the project hints at a relationship between Ramsar sites and ecotourism (e.g. through birding activities), it does not seem that this project is fully leveraging the potential of the Ramsar sites in their tourism plans.

11. Thailand: Integrated Forest Landscape Management for Strengthening the Northeastern and Eastern Forest Corridors, FAO (GEF Program Financing: \$3,137,671) (GEF ID: 10390)

✓ **France Comments:**

- Although the reference in the introduction to the link between deforestation/degradation of ecosystems and the COVID-19 pandemic is a positive development, we notice the lack of a "one health" approach across projects, while several projects address livestock production or human-wildlife cohabitation within and outside protected areas. (Projects 70.Thailand, 73. Papua New Guinea... among others). Placing greater emphasis on this aspect would be useful.

✓ **Canada Comments:**

- We recommend that the project proponent consider lessons learned from the existing Ngao Model Forest in Lampang Province; this would help mitigate risk of low stakeholder engagement. The Ngao Model Forest was established in the early 2000s' and focused on community gardens/forestry; potential collaboration with Ngao Model Forest could be cited on page 32 where partners with expertise in landscape management are listed.

✓ **Germany Comments:**

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

Germany welcomes the well thought out proposal and particularly the significant government support and commends the inclusion of various government agencies to strengthen the implementation.

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

- Given the high relevance of the project for Biodiversity protection in Thailand, it would be recommendable to include a plan for Biodiversity Monitoring and reflect this in one of the indicators.

12. Indonesia: Crop Diversity Conservation for Sustainable Use in Indonesia, FAO (GEF Program Financing: \$6,192,694) (GEF ID: 10511)

✓ **United States Comments:**

- The Nagoya Protocol is not specific to PGRFA – will all of the proposed outputs and outcomes under Component 1 be related to ABS for PGRFA? For example, the development of strategies/action plans for implementation of ABS could be a big task on its own, especially if this is for all GR, not limited to PGRFA.
- We hope that project implementation will include any efforts necessary to ensure smooth coordination between ministries responsible for different biodiversity-related conventions.
- Some of the focus crops – in particular rice, taro, and yams – are covered by the Multilateral System of the International Treaty of Plant Genetic Resources for Food and Agriculture. Will any material that may be collected be made available through the Treaty's MLS?
- The Second State of the Worlds' Plant Genetics Resources identified clear gaps/issues that this project could address. Similarly, the Global Crop Diversity Trust, in particular the Crop Wild Relatives Project, may have resources or lessons learned helpful in further development of this project.

✓ **Canada Comments:**

- We have noted with concern that all references to the International Treaty on Plant Genetic Resources for Food and Agriculture (ITPGRFA) were removed ('in response to upstream GEFSEC comment to that effect'), given that 3 out of the 5 target crops are on Annex 1 of the ITPGRFA, and it is generally accepted that it is very important that there would be mutually supportive implementation of the Nagoya Protocol and the ITPGRFA. This project appears to offer an invaluable opportunity to build capacity to do so in Indonesia - there is otherwise a risk of developing 'access and benefit sharing' legal measures that could detract from food security considerations and interfere with Indonesia's other commitments. We recommend that the project reconsider implementing in accordance of the ITPGRFA ; we would consider avoidance of this issue is to the detriment of this project and the stakeholders concerned.

✓ **Germany Comments:**

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

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

- The support structure of the project is logical since the Ministry of Environment and Forestry is formally responsible for the implementation of the Nagoya Protocol and the research unit of the Ministry of Agriculture is to implement the project. However, in the interest of upscaling the project's activities are feasible without any direct involvement of the implementation directorates of the Ministry of Agriculture. Germany would therefore kindly suggest that the project considers which partners would be appropriated in order to achieve the envisioned upscaling.

13. Samoa: Enhancing integrated sustainable management to safeguard Samoa's natural resources, UNDP (GEF Program Financing: \$3,502,968) (GEF ID: 10410)

✓ **Germany Comments:**

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

- Germany would like to request that the project propels takes into account some of the existing local structures and organizations addressing invasive alien species. Firstly, the regional organization SPREP, located in Samoa, has one of the most comprehensive programs on Invasive Alien Species and should be closely involved in project implementation. The current proposal does not emphasize their role sufficiently. Secondly, the Pacific Invasives Partnership (PIP) is the overarching regional coordination body for authorities dealing with

invasive species. It is not mentioned in the proposal and we would therefore like to recommend its close involvement. Thirdly, the "Invasive Species Specialist Group" of IUCNs which is active in the Pacific in the long term, is not mentioned in the proposal. We believe that project would benefit greatly from the involvement of organization already specializing in the topic.

- We would further like to point out that *Acanthaster planci* is a naturally occurring starfish species with cases of mass reproduction. It is not an "alien species" in the strict sense and the proposal should reflect this.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

14. Mexico: From bait to plate: strengthening sustainable fisheries to safeguard marine biodiversity and food security, FAO (GEF Program Financing: \$9,005,609) (GEF ID: 10540)

✓ **Norway/Denmark Comments:**

- The Norwegian embassy has previously been in discussions with CONAPESCA and SEMARNAT about the possibility of Mexico investing in Norwegian technology to further its advance into fish farming, but so far there are no concrete projects.
- There is a strong need for new and improved ways to remeasure Mexican fish stocks, especially on the Pacific coast. As the project accurately describes there is a need for clearer cut and less bureaucratic regulation when it comes to No Take Zones and Marine Protected Areas in Mexican waters.
- The project seems very ambitious, but with a clear rationale and well-structured design with measurable indicators, relevant baseline data, and identified means of verification. Even though the project is ambitious, several of the outcomes, like greatly reducing bycatch by implementing a new regulation standard, seems achievable.
- Relatively small investments in improvements to postharvest fish handling, storage and transportation, could have a huge positive affect on the value of the fishery. We would therefore like to underline the importance of these elements in component 3. Increased effort to technical support to post harvest treatment and food safety measures, including support to improve sanitary measurements, infrastructure and processing are important to better utilize the resources and increase value.
- The risks identified in chapter 5 should include risks of availability and access to reliable data of the resources. There is often a significant shortcoming of reliable catch data and data recording systems which can provide reliable

estimates of the fisheries resources. Lack of reliable data concerning fish stocks, catch effort, landings, utilization and consumption are often major constraints that hinder the fishing sector development planning. Nevertheless, such systems could be very costly in terms of funds and human resources and should be scaled according to the size and trends in the fisheries. It is positive to see that a fisheries information system is developed under Output 1.1.4. However, the risks of obtaining poor and unreliable data are high. These risks should be assessed with proposed mitigating measures.

✓ **Germany Comments:**

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

Germany welcomes the proposal. The project's core focus to promote the ecosystem-based approach to fisheries management, which will enable the integration of socio-economic and environmental priorities, is very convincing and does reflect best practices. The aim to review, simplify and harmonize existing fisheries regulations to respond to local conditions and community needs, to generate a shared definition of sustainable seafood, based on Marine Stewardship Council standards, and advocate for its use in fisheries regulations is highly welcomed.

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

- Germany would like to encourage more emphasis in the proposal on the implementation according to the FAO-Code of Conduct for Responsible Fisheries (CCRF) and the FAO-Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (VGSSF), which both are seen as crucial for any project success in the context of Blue Economy / marine resource utilization.

✓ **United Kingdom Comments:**

An initial agency response to the below comments from the United Kingdom was provided and can be found in the list of documents specific to the project in the GEF Portal.

- It would be good to understand government buy-in is for this project, and who the main counterparts are on the Mexican side. In addition to the Commission's mentioned, is the Environment Ministry SEMARNAT aware of this, the Agriculture Ministry SADER or the Agenda 2030 team in the President's Office?

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- We hope that any cross-agency jurisdiction and coordination challenges may be smoothly overcome in this project. We recommend particularly attention to successful enforcement of Natural Protected Areas and fisheries No Take Zones.

15. Papua New Guinea: Enabling sustainable production landscapes in Eastern Highlands and Western Highlands Provinces for Biodiversity, Human Livelihoods and well-being, FAO/ UNDP (GEF Program Financing: \$6,463,097) (GEF ID: 10515)

✓ **France Comments:**

- Although the reference in the introduction to the link between deforestation/degradation of ecosystems and the COVID-19 pandemic is a positive development, we notice the lack of a “one health” approach across projects, while several projects address livestock production or human-wildlife cohabitation within and outside protected areas. (Projects 70. Thailand, 73. Papua New Guinea... among others). Placing greater emphasis on this aspect would be useful.
- The proposed community management of protected areas is interesting, but what about outside the protected areas? And how are agricultural pressures on the forests taken into account by manufacturers?

✓ **Germany Comments:**

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

- Germany would like to point out that due to the importance of Papua New Guinea as a mega-biodiverse country and its complexity, every project approach should be supported by all possible means. In current proposal, pragmatic local seems to be lacking and could potentially hamper project success. The overall project approach is very ambitious. Even though the proposal correctly recognizes that ‘the root causes of environmental problems in the highlands are complex and include demographic, economic, socio-political, scientific, technological, cultural, and religious root causes’, the project approach does not fully grasp this complexity. We have concerns that achieving the described outputs in only four years might not be feasible and would therefore like to request that activities, outcomes and outputs are reassessed in the further project design and possibly adjusted/reduced to be feasible in the given timeframe and budget.

16. South Africa: Capacity strengthening for management of invasive alien species in South Africa to enhance sustainable biodiversity conservation and livelihoods improvement, UNEP (GEF Program Financing: \$3,411,644) (GEF ID: 10524)

✓ **Germany Comments:**

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

- Germany would like to request that the overall project approach and feasibility are re-evaluated during the further design of the project, in particular activities, outcomes and outputs under the components 1 and 2. The proposal combines many tasks at different levels, including setting up an inter-agency Risk Assessment Centre as well as a biosecurity risk management system, controlling ports of entry and involving a vast number of stakeholders, including private sector, local communities and environmental groups. While we welcome the overall project goals as an effective means to conserve biodiversity, we would recommend that the project focuses on aspects that are feasible within the given timeframe and budget.
- With regard to invasive alien vegetation, its competition with indigenous vegetation and the overall water balance (e.g. the “adopt a river” approach by the communities), a connection could be made with the GIZ Regional Project NATURES, as they have activities which tackle invasive alien species to preserve water.

17. Regional, Botswana, Congo, Mozambique: The deployment of EarthRanger, a data visualization and analysis software to strengthen Protected Area Management Effectiveness in Africa's National Parks, CI (GEF Program Financing: \$2,407,360) (GEF ID: 10551)

✓ **United States Comments:**

- We are very supportive of this project. Earth Ranger has a demonstrated record of success and the proposal lays out clearly defined goals. We had two overarching comments we hope improve project implementation
- First, Earth Ranger is often emphasized as a tool to direct real-time ranger effort in response to acute threats – but given that many of the threats to the protected areas described here are also longer term (e.g. climate change, encroachment, fragmentation), we would encourage the implementers to leverage Earth Ranger’s integrated data collection & management capabilities to support longer term applied conservation research and action – to shape PA management beyond responding to immediate threats.

- Second, the “control centers” required to operate an integrated Earth Ranger system seem to require hefty technology infrastructures. What are the baseline levels of functionality/infrastructure that PAs must have in place to use Earth Ranger? How much training does it take to train rangers or other protected area officials in these tools and the hardware maintenance/troubleshooting? Is capacity being built so that park officials can use this platform independently, or will they need sustained assistance from Vulcan/CI?

✓ **Germany Comments:**

Germany would like to acknowledge the relevance of the proposed objective and components as well as the detailed consideration of local stakeholder involvement from the preparation process on.

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

- Some chapters of the PIF are incomplete or in a confusing order, such as 1. Project Description – 1a) short project summary is missing B.
- Baseline Scenario: it does not describe the baseline in the selected countries and what the status quo of the Monitoring System is. It should also reference to what extent existing forest Monitoring systems could help create synergies – particularly applies to Mozambique and RoC where considerable efforts have been put into MRV for REDD+ (FCPF Carbon Fund).
- Chapter G Sustainability: the section does not explain how continuous operations of the EarthRanger System are ensured beyond the lifetime of the project (quantify operational budget necessary).

18. Pakistan: Strengthening Community-managed Protected Areas for Conserving Biodiversity and Improving Local Livelihoods in Pakistan, UNDP (GEF Program Financing: \$2,338,356) (GEF ID: 10529)

✓ **Germany Comments:**

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

- Germany would like to request that the overall project approach and feasibility are re-evaluated during the further design of the project, in particular activities, outcomes and outputs under the components 1, 2 and 3. The proposal combines many tasks at different levels at different geographic areas and the funding allocated to these activities does not seem sufficient in many cases. We would therefore recommend that the project focuses on aspects that are feasible within the given timeframe and budget.
- In addition, we would like to emphasize that long-term sustainability of some of the proposed outcomes and outputs would need to be reassessed. This refers

specifically to Outcome 3.1 and corresponding Outputs as well as to Output 1.4. In the former case it would be important to ensure long-term sustainability of the funds and other sources of income to be generated. In the latter case it would be important to consider how capacity stays within a certain organization when specific office holders leave that organization. There is a risk of capacity and resources being lost.

✓ **India Comments:**

- In respect of Strengthening Community-managed Protected Areas for Conserving Biodiversity and Improving Local Livelihoods in Pakistan, UNDP (GEF Project Financing: \$2,338,356) (GEF ID: 10529), the project is proposed to be taken up in the Pakistan occupied Jammu and Kashmir, which is a part of India under the illegal occupation of another country and would prima facie amount to a violation of India's Constitution, sovereignty and territorial integrity. For this reason we oppose the project and do not join the Council for approval of the project, and oppose the approval of any component of the project to be taken up in the Pakistan occupied Jammu and Kashmir, which is a part of India under the illegal occupation of another country.
- We have also noted that all projects that are approved by the Council and endorsed by the CEO should be consistent with the GEF instrument and GEF policies and procedures. We would like to understand from the GEF Secretariat whether GEF has a specific policy regarding projects in disputed areas. If such a policy exists, we would like a confirmation that all the above projects are as per such policy. If such a policy does not exist, we would like to understand the impediment, if any, in GEF Sectt following the principles under the well-established World Bank Operational Policy on Disputed Areas (OP 7.60).

✓ **United Kingdom Comments:**

- Given where programme is planning to be implemented and given the often challenge between conservation and communities it is important to take a conflict sensitive approach across programme implementation.
- A few projects have already been implemented in this space from GEF funding. It will be interesting to find how that went and if lessons can be built into this phase. <http://550691468758380378>

✓ **United States Comments**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- Counter wildlife trafficking work is also proposed for Pakistan under the Global Wildlife Program Addendum (10561). We would appreciate more information on the programmatic overlaps and any planned coordination.

19. St. Vincent and Grenadines: SVG: Coastal and Marine Ecosystems Management Strengthening Project, World Bank (GEF Program Financing: \$3,652,968) (GEF ID: 10549)

✓ *Canada Comments:*

- We would like to emphasize that sustainability of the intervention is critical, and we would like to clarify whether or not the World Bank will bring in systems that support the sustainability of marine management. This could be of particular importance given that the lessons and examples coming out of this would may be transferrable to other Caribbean islands. We recommend that consultations are done with the region on this work.

✓ *Norway/Denmark Comments:*

- This is a comprehensive and ambitious project. All the outcomes seem relevant and important for effective and integrated coastal and marine management. The project will contribute to allowing for a more sustainable development of the ocean-related industries in the country, while safeguarding important biodiversity.
- Nevertheless, the Norwegian experience is that many of the outcomes described are very resource- and capacity-demanding. Thorough planning both for the project phase and future follow-up in the communities will be crucial. It will probably also be useful to have transfer of external experiences. Relevant outcomes will depend on the ability to build structures and establish processes for cooperation across sectors and local communities, and there may be a need for contributions from several scientific disciplines.
- To be able to fulfil the ambitions, it is important that the project document describes, among others, anti-corruption measures, how expertise and capacity can be acquired and how St. Vincent and the Grenadines will manage to follow up in the future. Is there institutional capacity with the state authorities today, and if not, will this be sufficiently built up so that the work can continue after the 5-year project is completed? Especially important with a good exit strategy.
- In addition to stakeholder involvement already described, we suggest involving educational institutions at several levels, from primary school and upwards. This can build ownership and capacity for the future.
- Will there be resources available to operate the planned database of marine resources after WB leaves the country, and will a data policy be drafted, prepared and implemented during the project period?
- Will the database be accessible to anyone who wants to access it (the PIF states public access)? What about the fishing fleet in the island's waters? As a preventive measure, one could consider mapping ownership structure of the fishing fleet in St. Vincent and the Grenadines. How will increased access to information on available marine resources affect any illegal activities in the island's waters? Has it been considered? There appears to be little information

on the island's capacity to monitor, control and survey work in their own economic zone.

- St. Vincent and the Grenadines share the Grenadine archipelago with Grenada. How does the WB ensure cooperation between the two island states when mapping the marine resources? Are there any current conflicts between the island states regarding borders and/or ownership of the marine resources that exist in the surrounding waters?
- The island state is also a member of AOSIS, Caribbean Community (CARICOM) and the Organization of the Eastern Caribbean. How will the WB and the project collaborate with the regional bodies?

✓ **Germany Comments:**

Germany welcomes the very comprehensive project idea to strengthen the management of coastal and marine eco-systems of St. Vincent and the Grenadines through (i) institutional and policy support, capacity building for coordination, spatial and financial management, and monitoring of the coastal and marine environment; (ii) setting-up a publicly accessible national knowledge platform; and (iii) developing a communication plan and demonstrating the effectiveness of spatial planning approaches in selected pilot coastal and marine sites. A positive element is the explicit support of participatory approaches.

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

- Although the project outline is well-structured and gives the impression of an extensive and well-thought-out project, a detailed project description where approaches and methods how to implement activities and achieve the objectives are specified, is missing. The planning of the project appears to be at an early state, and we would therefore like to request that the proposal is substantially expanded and revised in terms of content and methodology.
- An exchange with the GIZ project “Improving climate resilience of Caribbean island and coastal states through systemic management of aqua-terrestrial resources (Caribbean Aqua-Terrestrial Solutions, CATS)” would be suggested. The project is supporting Marine Protected or Managed Areas in Dominica, Grenada, and Saint Lucia (in Grenadine and St Vincent it operates mainly inland) and enables the population to better adapt to climate change, inter alia with the Ridge-to-Reef approach.

20. Seychelles: Prioritizing Biodiversity Conservation and Nature-based Solutions as Pillars of Seychelles' Blue Economy, UNDP (GEF Program Financing: \$4,955,023) (GEF ID: 10535)

✓ **Canada Comments:**

- It will be important for this project to identify what strengthened capacity and frameworks will look like and how it can be measured.
- The project description/proposal should clarify how the project will facilitate conservation of biodiversity through effective management of the Seychelles' protected areas system via strengthened frameworks and capacity.

✓ **Germany Comments:**

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

Germany welcomes this comprehensive approach to conserve globally significant biodiversity, taking into account Blue Economy and Marine Spatial Planning objectives, by strengthening the political and institutional framework and capacities, expanding the MPA system and improving the management effectiveness and investing in innovative nature-based solutions. The planned participation and empowerment of local communities is seen as particularly positive, as well as the priorities gender mainstreaming, knowledge management and monitoring and evaluation (M&E).

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

- The second project component aims at expansion and better management of four priority MPA sites. In addition to the expansion of MPAs, consideration should be given to ways of consolidating MPAs by connecting protected systems to ensure ecological connectivity for migratory species and genetic diversity.
- The third component focuses on innovative nature-based solutions to support livelihoods and sustainable development in 3 sites. In view of the complexity of the ecosystems under consideration and the various pressures that threaten them, we would like to propose to cooperate with research organizations in identifying and piloting NbS.
- As climate change is described as one of the major threats to Seychelles' ecosystems and in particular to coral reefs, reduction of this threat should also be addressed within the partnerships with the private sector, e.g. by promoting and increasing efforts to reduce the carbon footprint of hotels, tour operators, etc., instead of focusing only on local threats.
- In the context of sharing knowledge and South-South cooperation on Blue Economy with Indian Ocean countries and other SIDS, an exchange with (1) the

recently started GIZ project “Regional Ocean Governance Initiative West-Indian Ocean”, focusing on cross-sectoral multi-actor approaches for strategy development and problem solving to improve the conservation and sustainable use of marine and coastal biodiversity in the WIO region and (2) the partnership project “Coastal Ecosystem Monitoring in Cabo Verde” (funded by the BMZ initiative MeerWissen – African German Partners for Ocean Knowledge), aiming at knowledge-based sustainable development of the coastal zone and the marine environment through the development of a blueprint for a coastal ecosystem monitoring and an intense co-design process with local stakeholders on Cape Verde, an archipelago that has been very active in promoting a Blue Maritime Economy.

✓ **United Kingdom Comments:**

- UK in Seychelles has commented that they have worked closely with Govt of Seychelles in the past on the Blue Economy and would hope to find opportunities to work in the margins of the proposed GEF project to take forward the UK’s objectives on climate change and COP 26 preparations.

21. Philippines: Protecting priority coastal and marine ecosystems to conserve globally significant Endangered, Threatened, and Protected marine wildlife in southern Mindanao, Philippines, UNDP (GEF Program Financing: \$2,639,726) (GEF ID: 10536)

✓ **Canada Comments:**

- We appreciate the additional focus of the project on improving sustainable use, livelihoods and institutional mechanisms beyond protected areas, but the project should clarify how it will accomplish all of the outcomes it sets out to achieve.

✓ **Germany Comments:**

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

Germany welcomes this proposal, which addresses the protection of globally endangered biodiversity of marine megafauna, and specifically welcomes that agencies from the national biodiversity and fisheries departments cooperate for this project proposal from the very start.

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

- As seagrass and reef ecosystems build the nutritional basis for the ETF marine wildlife in focus, specific measures to protect and restore these systems, should be more specifically addressed. Improvement of and support to municipal waste-water- and waste treatment will be crucial for the maintenance of

ecosystem functions especially in the two bay systems proposed for management under the project.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

22. Maldives: Conservation of Atoll Ecosystems through an effectively managed national protected area Estate (CATENATE), IUCN (GEF Program Financing: \$2,110,358) (GEF ID: 10542)

✓ **Canada Comments:**

- There is mention in the project description of ‘piloting and codifying for formal recognition diverse classifications of protected areas; we recommend confirming this action, as the measurement of progress for Aichi Target 11 utilizes tallying protected areas that are categorized using the IUCN guidelines on protected areas.

✓ **Germany Comments:**

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

Germany welcomes the initiative to safeguard nationally and globally significant coral reef biodiversity and associated ecosystems through a resilient network of equitably and effectively managed protected and conserved areas in the Maldives. The strong communication and dissemination strategy are to be positively emphasized, as well as the approach for long-term sustainability through e.g. the training of trainers to ensure continuation of good management and governance beyond project duration.

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

- The first project component will enable policy and legal framework and capacity building for good governance and, to ensure sustainable management of the Protected Area network, develop tools, standards, manuals and handbooks. The collection and integration of traditional knowledge in management strategies and the developed materials would be an important and valuable addition.
- In the second project component in the context of innovative funding opportunities, incentives for the development of Sustainable Blue Economy business models should be given/included as well as other innovative income generating activities - not only for groups that could be affected negatively in

socio-economic terms (as mentioned) but for economic diversification and improved livelihoods.

- In the first and the second project components a strong participatory approach through active involvement and empowerment of local communities, the private sector and other stakeholders would be desirable - especially against the background of an integrated and equitable sustainable system.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

23. Colombia: Mainstreaming biodiversity conservation in the tourism sector of the protected areas and strategic ecosystems of San Andres, Old Providence and Santa Catalina islands, WWF-US (GEF Program Financing: \$2,652,294) (GEF ID: 10578)

✓ **Germany Comments:**

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

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

- The regional environmental authority Coralina suffers from fundamental capacity and transparency deficits. Since the reform of the regional environmental authorities has been discussed for years without any substantial progress. This is a structural problem which needs to be taken into account as a risk factor and be addressed through appropriate audits and follow-up activities in order to ensure sustainable impacts.
- On the island of Providence, the use of the sand from beaches as a building material constitutes a problem that could be addressed in the context of sustainable tourism. As a result of this practice, the beaches - one of the main tourist destinations - increasingly decimated and the islands are being deprived of a major source of income.
- In addition, the disposal of waste, including old cars, is a major problem. This challenge should be an integral part of the relevant strategies related to sustainable tourism.
- The proposal does not mention private sector cooperation explicitly. However, existing businesses in the tourism sector (e.g. hotels) rely on the existence of biodiversity and ecosystems in order to sustain their business. The project could therefore seek collaboration with the private sector in this regard.
- In order to increase impact and implementation prospects of the project proposal, we would like to suggest including concrete measurable impacts in the project design. (e.g. protection of coral reefs, beaches, etc.).

- The co-financing to be provided by the CORALINA Archipelago Departmental Authority seems rather high with USD 18.6 million. We would therefore like to suggest that more details on the kinds of financing are provided and that the authority's capacity in providing these are thoroughly checked.

✓ **United States Comments**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- We look forward to seeing significant development in the stakeholder section at the next proposal stage, including greater involvement of the private sector and Afro-American communities.
- We agree with the STAP's recommendation of greater articulation on how the project can adapt, in the light of COVID-19 related impacts on tourism.

CLIMATE CHANGE MITIGATION

24. India: Accelerating adoption of super-efficient technologies for sustainable thermal comfort in buildings in India, UNDP (GEF Program Financing: \$4,416,210) (GEF ID: 10370)

✓ **Canada Comments:**

- The project leads should establish linkages with the Clean Energy Ministerial (CEM) - Super-efficient Equipment and Appliance Deployment (SEAD) group, which has identified cooling efficiency as a priority area going forward, and has been involved in leading initiatives such as the Advanced Cooling Challenge.

✓ **Germany Comments:**

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

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

- Component 1 of the project should build on the framework developed under the Indo-German Energy Programme (including thermal comfort database) for residential buildings during implementation.
- Component 2 of the project should take into consideration the building materials for the building envelope as per the Eco-Niwas Samhita-ENS (Energy Efficiency Building Code for Residential building) in order to reduce the cooling requirement in compliance with the Code and to achieve the Residential Building Energy Efficiency Star Label. The Indo-German Energy Programme is working on energy efficient building materials and intends to work on standards and labelling for EE building materials in the next phase. Therefore the project

should consider adopting and synchronising the efforts of the building material directory for mitigating a rising cooling demand.

- The Indo-German Energy Programme is currently working on implementation of the Eco-Niwas Samhita-ENS (Energy Efficiency Building Code for Residential Building) and Residential Building Energy Efficiency Star label in five states Punjab, Uttar Pradesh, Delhi, Karnataka and Maharashtra through State Designated Agencies (SDA) and intends to add two more states including Telangana in the next phase of the programme. The project should avoid duplication of similar activities in the same states.
- The project should avoid supporting the market entrance or accelerated uptake of regulated substances, in particular HFC-based air conditioning systems, even when super-efficient, in any way. Such support would not be regarded as a project with sufficient incremental value and innovative character as it promotes a technology lock-in irrespective of short-term climate benefits.
- The project should take into consideration that the Central Government in consultation with the Bureau of Energy Efficiency (BEE) has notified new energy performance standards for room air conditioners on 30th October 2019 that 24-degree Celsius default setting has been made mandatory from 1st January 2020 for all room air conditioners covered under the ambit of the BEE star-labelling programme.
- In paragraph 42 the project proposal states that India's HPMP programme targeting the re-training of servicing sector technicians "does not take into account the energy efficiency spectrum and is solely focussed on creating capacity on refrigerants". O&M best practices for alternative technology options (including flammable A2L and A3 refrigerants) are in fact being taken into account in India's HPMP programme.

✓ **Switzerland Comments:**

- Overall, Switzerland welcomes this project proposal focusing on the need for cooling which particularly in India will be essential for meeting the SDGs.
- We believe it is key that the project considers all types of buildings including residential buildings and not only focuses on commercial buildings. In line with this the ECBC-R Building Code has to be considered in the project, which is a building code for residential buildings. The building code was endorsed in 2018 by the Indian government.
- The project should look at cooling in an integrated way and not only focus on mechanical cooling, e.g. through AC, but also address passive cooling measures such as natural ventilation, wall and ceiling insulation, etc. These passive measures can reduce the need for mechanical cooling significantly.
- The need of better building design in terms of natural ventilation, daylighting and livability in building is extremely important before people start using the energy efficient ACs. These aspects of building can be further strengthened in the proposal. Under the BEEP project (which is supported by SDC) has shown

practically the importance of these aspects in order to achieve a better thermal comfort.

- Component 2, seems to focus more on energy efficient cooling technologies. It may be because of the fact that in the existing building stock there is a rapid increase in cooling requirement. However, for a new construction, it requires equal or even more emphasis to be laid on energy efficient building materials and technologies (LC3 cements, low thermal conductivity blocks, roof insulation, external shading systems, double glazed windows, etc.). Therefore, a balanced approach on cooling requirements towards existing and new buildings is necessary.
- The project should be implemented in collaboration with the various states of India and not remain on federal level only, since the states are crucial for the implementation in this area of action.
- Component 1 provides a lot of focus at national level coordination, while national level coordination is important, more focus on state level policies and coordination should be given. When it comes to implementation, States have a primary role in "building regulation", "local area planning", etc, thus developing state level cooling action plans for buildings and their implementation would be important.
- We welcome that the project is planning to coordinate its activities with K-CEP (Kigali Cooling Efficiency Program) and SEforAll as well as other bilateral initiatives including projects supported by SDC, GIZ and USAID.
- It is essential that UNDP involves crucial entities with a lot of experience in cooling and energy efficiency in the implementation of the program in India to have a strong implementing team with a lot of experience in the local context. These include CLASP, IEA, LBNL, BEEP India, TERI and AEEE.
- Proposal mentions other executing partners (page 1) are BEE and MoEFCC. At the policy level, ECBC, ECBC-R and ICAP have been developed by BEE and MoEFCC but it may be note that construction of buildings such as affordable housing, government buildings, etc comes under the Ministry of Housing and Urban Affairs (MoHUA). For enforcement of various policy measures, it will be important to also involve MoHUA as the executing partner. This will be important to gain ownership of MoHUA at every stage although Project Steering Committee comprises key stakeholders of the project like BEE, MoEFCC, MoHUA, Urban Local Bodies etc.
- Component 1 deals with building codes, building passports, etc. Passive design is an integral part of the building codes and on some instances proposal does refer to Residential building codes, so to a certain extent passive design dimension is present in the proposal. However, proposal clearly seems more focused on commercial buildings as it repeatedly refers to ECBC (which is for commercial buildings); ECBC-R or Eco-Niwas Samhita has not been mentioned which is necessary to highlight in proposal. The focus on commercial building is ironic, despite the fact that ICAP clearly indicates that a large part of the cooling demand will come from the residential buildings.

- Affordable housing which is applicable to the large population in India does not figure in the proposal. Even the large corporates are likely to focus on affordable housing. See the link:
<https://economictimes.indiatimes.com/news/politics-and-nation/covid-crisis-should-be-a-wake-up-call-for-mumbai-slums-says-ratan-tata/articleshow/75265412.cms>
- As may be the case with other sectors, due the impact of Covid19 the construction sector is also badly hit in India. It will be useful if the proposal also looks at this aspect and integrate it in the proposal as part of the risk assessment in project design. Useful link:
<https://www.businesswire.com/news/home/20200420005398/en/Evaluating-Impact-COVID-19-Demand-Construction-Equipment-India>
- It is good to see that the project will also coordinate with bilateral programmes with SDC on energy efficiency in buildings, with GIZ on Indo German Energy Programme and USAID under Market Integration and Transformation for Energy Efficiency (MAITREE) Programme (page 46).

✓ **United States Comments**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

LAND DEGRADATION

25. Mauritania: Development of an integrated system to promote the natural capital in the drylands of Mauritania, IUCN (GEF Program Financing: \$3,913,626) (GEF ID: 10444)

✓ **United States Comments:**

- While the work undertaken by the UNCCD's LDN Target Setting Programme is acknowledged towards the end of the proposal, there are missed opportunities for it to be incorporated as part of the baseline scenario as well, since this work is an integral part of how the LDN baseline is being developed.
- We recommend that the project explicitly brings these results back into the UNCCD, via improved reporting and through the identification/validation/announcement of the LDN target as a result of the work conducted through this project. The project could usefully foster greater synergies and leveraging of both the results of the project and the UNCCD's TSP work to maximize the benefits of this project and to enhance implementation of the UNCCD.

✓ **Germany Comments:**

Germany requests that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement.

Germany acknowledges the project's intention to incorporate traditional knowledge and suggests to further elaborate on safeguarding and to also consider and elaborate on the role of private sector organizations such as mining industry that is involved in the project with in-kind contributions.

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

- Very low number of direct beneficiaries targeted. The proposed activities and outputs do not sufficiently reflect how they address the barriers mentioned in the project's rationale. The projects description does not fully correspond to the result framework.
- In order to make the project beneficial for a larger part of the 4.4 million people living in Mauritania, Germany requests the GEF to:
 - strengthen the project's component on upscaling;
 - use the project as pilot in order to transfer knowledge and experience gained at a larger scale and aim for creating results that include concrete recommendations for upscaling;
 - further elaborate and integrate details on how an enabling environment for LDN targets implementation is created (outcome 1.2);
 - add meaningful indicator to the result framework to support reaching targets and to contribute to measure achievements of the project with regards to outputs/outcomes and specify quite general description and vague terms such as "key stakeholders", "databank created and updated", etc.
 - revisit barriers indicated in theory of change and further elaborate how the project can significantly contribute to overcome these barriers;
 - incorporate a convincing stakeholder involvement strategy which is particularly but not only essential for the capacity development strategy (e.g. local and national governments are seen as crucial, mentioned in text, but not part of result framework and stakeholder description).

26. Tuvalu: Integrated Agro-ecosystem Approach for enhancing Livelihoods and Climate Resilience in Tuvalu, FAO (GEF Program Financing: \$2,365,753) (GEF ID: 10517)

✓ **France Comments:**

- Favorable opinion, integrated/systemic approach, from the soil to the value chain, with a monitoring and evaluation system. What is the training/advisory mechanism in place to leverage implementation/dissemination?

✓ **United States Comments:**

- Why is Tuvalu pursuing this project under the GEF and not availing itself of the technical support available via the UNCCD's Target Setting Programme?
- Although much of the work here is relevant to the UNCCD, the convention is only mentioned in the theory of change section. This proposal would benefit from leveraging the synergies of the UNCCD work.
- We do not see the UNCCD focal point ministry listed for engagement engaged. This oversight should be remedied, to ensure that the project's outcome is maximized and UNCCD implementation is furthered. Similarly, the Ministries of Foreign Affairs, of Trade, Tourism and Commerce, and of Natural Resources, Energy and Environment should be added as a stakeholder.

✓ **Germany Comments:**

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

Germany acknowledges the realistic and gender-inclusive focus of the proposal which covers previously neglected islands as well as due diligence and cultural heritage aspects.

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

- Regarding private sector involvement, Germany recommends coordinating with the NDC Hub which is working on an NDC roadmap and investment planning in Tuvalu, including an investment forum (possibly in August 2020).
- Germany welcomes the envisaged technical cooperation with SPC and SPREP into consideration. It would be beneficial to ensure this includes cooperation with SPC's Land and Resources Division (LRD), who have extensive knowledge of agriculture in the Pacific and can share their experience on Climate Smart Agriculture in Nauru.
- Furthermore, Germany would like to ask for details on the assumptions which were used to estimate the envisaged carbon sequestration by the project.

✓ **United Kingdom Comments:**

- Is there full Government support and commitment for this project?

27. Gambia: Integrated Landscape Management Gambia (INLAMAG) Project, IFAD (GEF Program Financing: \$4,708,582) (GEF ID: 10572)

✓ **France Comments:**

- Favorable opinion. Clarification on what is meant by Climate Smart Agriculture (CSA) would be helpful. As CSA essentially opens the door to using GMOs (a red line for France), we generally prefer, with respect to resilient or climate-friendly and biodiversity-friendly agriculture, to focus on the promotion of agroecological practices, which could include “climate-smart agriculture” as a tool, provided it does not involve the use of GMOs.

✓ **Canada Comments:**

- Overall, this initial proposal contains minimal information on what the project will actually do/seek to do – we recommend that the project proponent better flesh out the proposal before it can be approved.
- Additionally, the proposal contains little information on how the project will address gender equality issues – this should be addressed. Given that climate-smart agriculture is mentioned within the project objectives section, food security should be considered as an area of focus.

✓ **Norway/Denmark Comments:**

- The key concept underlying the proposal is Land Degradation Neutrality (LDN). The concept has been defined by the Parties to the Convention to Combat Desertification as: “A state whereby the amount and quality of land resources, necessary to support ecosystem functions and services and enhance food security, remains stable or increases within specified temporal and spatial scales and ecosystems.”
- The LDN was launched in 2017 at the 13th COP and as such is a relatively new concept but based on a number of different pilots around the world. Only a small handful was established in Africa, including Ethiopia and Namibia
- Specific guidelines for the LDN have been published recently.
- Many of the planned interventions are well tested technologies like agroforestry, conservation agriculture, etc. It helps with the monitoring if the concepts are well defined in the final project document. In the PIF both conservation agriculture (CA) and climate smart agriculture (CSA) are used. Climate smart agriculture can include a large variety of different technologies from organic agriculture to use of GMOs. Important to be clear on what exactly are the particular activities to be supported.
- If it is a rice growing area it would be useful to introduce System of Rice Intensification (SRI). It was launched in The Gambia in 2014 as a part of a regional World Bank project.

- It appears that free handouts (cooking stoves) will be distributed. Experience indicates that as a general principle, free handouts lead to dependency and inaction after the project closes. This should in general be avoided.

✓ **Germany Comments:**

Germany requests that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement.

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

- Complete the missing content in Part II. Project Justification, esp. 1a, 1b, 2, 3, 4, 5, 6, 7 and 8 in order to allow for a complete understanding of the proposal.
- In addition, Germany strongly suggests revising the costs linked to the first project objective referring to the institutional framework and capacity development for LDN (and SLM). Also, is recommended to further clarify the connection between the different objectives with regard to the underlying theory of change and the overall outcome of the project.

28. Jordan: Achieving land degradation neutrality targets through restoration and sustainable management of degraded land in Northern Jordan, FAO (GEF Program Financing: \$4,000,000) (GEF ID: 10528)

✓ **United States Comments:**

- This thoughtfully prepared proposal does an excellent job of linking together the work conducted under the UNCCD and this project, and it appears to be well-positioned to leverage those linkages to maximize the potential for the success of the project and bolster implementation of the UNCCD.

✓ **Germany Comments:**

Germany welcomes the proposed project with the aim of achieving land degradation neutrality through restoration and sustainable land management.

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

- Germany suggests revisiting the ambitious timeline/targets to make sure that all targets can realistically be achieved.
- Germany recommends integrating Jordan's climate policy framework, specifically to link the project to NDC implementation and to highlight its contribution to climate mitigation and adaptation targets.

- The project’s main focus is on agriculture. Germany recommends to also partner with entities that have experience with nature conservation and biodiversity and suggests elaborating on the nexus between land management, water resource management, and energy use. The concept of ecosystem services (ESS) could be introduced to ensure targeting the core natural functions of ecosystems and habitats in the proposal.
- Germany would like to highlight the “Improvement of Green Infrastructure in Jordan through Labor-Intensive Measures” (CfW-GI, PN 2017.4052.1) project that is currently working with the Jordanian National Agricultural Research Center (NARC) on very similar issues and suggests exploring potential synergies. Germany further recommends incorporating findings of the GIZ MoEnv project Ecosystem Services (EKF ESS PN 2013.9753.8). This BMZ funded ESS project has developed tools for sustainable ecosystem services management for rangelands and highlands.

29. China: Degraded Natural Forest Use Land Restoration and Management in Typical Water and Solid Erosion of China, UNDP (GEF Program Financing: \$2,986,758) (GEF ID: 10533)

✓ **Canada Comments:**

- While this project will focus on increasing climate resilience, there is no mention of climate-smart agriculture or food security in the proposal – we would like more information on how this will increase food security.

✓ **Germany Comments:**

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

Germany welcomes the well thought out proposal and particularly the significant government support and commends the inclusion of various government agencies to strengthen the implementation.

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

- Outcome 4 - at least 20% increase in awareness, knowledge, and capacity of project stakeholders – the indicator appears vague, and 20% knowledge increase not very ambitious. Recommend reframing to become clearer and more ambitious.
- Component 2 Outcome 2.1: upgrading of monoculture planted on NFUL to mixed forest; (2) planting of mixed forest on bare land in NFUL areas - The description should be explicit about what constitutes mixed forest in respect to which and how many different tree species (native?) are used.

30. Global - (Mongolia): Managing Peatlands in Mongolia and Enhancing the Resilience of Pastoral Ecosystems and Livelihoods of Nomadic Herders, UNEP (GEF Program Financing: \$3,757,991) (GEF ID: 10545)

✓ **France Comments:**

- Very favorable opinion. This project targets sustainable land management and the resilience of pastoral communities, two priority thematic areas for us.
- NB: France, through the FGEF, is supporting a sustainable cashmere project that is being implemented by the NGO Agronomists and Veterinarians Without Borders (AVSF). The project submitted by UNEP to the GEF and the AVSF project should be well coordinated.

✓ **United States Comments:**

- We feel this project could better leverage linkages with the Ramsar Convention and its extensive expertise/work on peatlands/peatlands re-wetting/restoration. For example, while Ramsar Sites are mentioned, the project makes no reference to the abundant information about peatland restoration available for policymakers and practitioners by the Ramsar Convention's Scientific and Technical Panel (STRP), which has conducted considerable work on rewetting and otherwise remediating peatlands.
- Additionally, while peatland information appears to be intended only for reflection in the UNFCCC national communication, though it could also be directed towards the Ramsar national reporting process, which includes reporting data related to peatlands.
- Finally, the project would benefit from additional coordination with the River Basin Management Division, the location of the Ramsar National Focal Point. Similarly, we recommend coordination with the National University of Mongolia should likewise be included as a stakeholder, since its head is the Ramsar STRP National Focal Point for the Ramsar Convention and is well-positioned to connect the project's peatlands work with the technical work/guidance on this same topic in Ramsar.

✓ **Germany Comments:**

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

- The proposed project focuses strongly on the Dhkha reindeer herders which represent only a small fraction of reindeer herders in the pilot areas. Germany suggests broadening the description of the target group to more adequately reflect the variety of reindeer herder groups in these areas.
- Following recent legislative changes from Jan 2020, a water agency will be created, which will have broad authority in areas relevant to this project.

Germany would like to suggest that these institutional changes and their implications are reflected in the proposal.

- Germany appreciates the mention of the BACCP und SPACES projects as being complementary to this project. However, Germany requests that the volume will be adjusted to „[...] via KfW 2015-2027 with a budget of USD 43.7 (39.0 million euro); [...]” and “[...] SPACES; via GIZ 2019-2022, with a total budget of USD 5.1 (4.58 million euro).”
- On a side note: some of the names of the ministries listed in the proposal are outdated (MET and MOFALI under old names).

CHEMICALS AND WASTE

31. Regional - (Lesotho, Madagascar, South Africa): Promotion of circular economy in the textile and garment sector through the sustainable management of chemicals and waste in Lesotho, Madagascar and South Africa, UNIDO (GEF Program Financing: \$7,400,000) (GEF ID: 10543)

✓ Germany Comments:

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

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

- In component 1 it is assumed that the target group for strengthening regulatory and institutional capacities are the mentioned executing partners.
 - Please provide more details for each country,
 - and explain who will take part in the technical committee (Output 1.1.3).
 - It also seems that the whole supply/value chains of the textile and garment (TG) sector is addressed, please also provide information if project activities are concentrated on specific steps (e.g. manufacturing) in the TG value chain as the whole value chain presents major challenges for circularity and transparency.
- In the entire proposal POP prevention and disposal should be linked more strongly to the topic Circular Economy and Circular Economy as the core topic should be more strongly emphasized.
 - Circular Economy is not integrated in most curricula of universities and professorships and research groups on circularity only exist in a niche, a shift in education is needed to strengthen regulatory and institutional framework. This should be considered as well under component 1 and/or component 4 (e.g. under Outputs 1.1.2, 4.1.1, 4.1.2).

✓ **Japan Comments:**

The below comments from Japan were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Programs and Projects in Chemicals and Waste focal area are barred from producing the global environmental benefits indicated in the Project Identification Forms (PIF) due to the COVID-19 outbreak, as many developing countries have suspended recycling and waste treatment, in an effort to reduce the risk of waste-treatment workers against COVID-19 virus infections. As a result, wastes including single-use plastic, medical wastes and hazardous materials have surged, resulting in widespread and illegal dumping and storage (a phenomenon which does not happen in Japan). According to our own experts, these problems are caused by a lack of technology and infrastructure (including automated intermediate treatment technology and Waste-to-Energy facilities such as incinerators), weak regulatory systems and low awareness among stakeholders. From this context, Projects (GEF ID: 10353, 10519, 10523, 10543) should be based on developing alternative scenarios that focus on sustainable recycling and waste treatment practices, taking into account pandemic risks arising from the COVID-19 outbreaks, to achieve the Global environmental benefits envisioned in the PIF. We recommend that programs in this focal area build stronger partnerships with various relevant stakeholders to address such root causes under the COVID-19 outbreak.
- On project 10519 (*Reduce the impact and release of mercury and POPs in Vietnam through lifecycle approach and Ecolabel*), Project 10523 (*Reducing uses and releases of chemicals of concern, including POPs, in the textiles sector*), and Project 10543 (*Promotion of circular economy in the textile and garment sector through the sustainable management of chemicals and waste in Lesotho, Madagascar and South Africa*) :

These indicate extremely low targets in Core Indicator 9 and 10, compared to the GEF-7 target (Indicator 9: 100,000 metric tons of POPs reduction, Indicator 10: 1,300 gTEQ of reduction of u-POPs), i.e., ID:10519: 35.01 tons (Indicator 9), ID: 10523: 25 tons (Indicator 9), 2.30 gTEQ (Indicator 10), ID:10543: 5.5 tons (Indicator 9), 11.50gTEQ (Indicator 10): These values are significantly less than the other GEF-7 CW projects whose PIF have already been approved.

✓ **United States Comments**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- We agree with the conclusions of the STAP review, that the interventions detailed to achieve the project objectives are vague, including on what types of circular economy approaches are intended.
- This lack of clarity is particularly of concern where circular economy concepts are proposed for uPOPs emissions reduction and contaminated land mitigation.

In our view, the goal of Component 3 (promoting the reuse and recycling of textile and garment wastes with the final objective of reusing and recycling 100% of wastes in the future in an environmentally sound manner) is concerning as written, and further, seems out of alignment with Output 3.1.2 (Training and capacity building in ISWM and BAT/BEP for ESM of textile and garment wastes). We request greater clarity on what wastes are envisioned for recycling, and what wastes are intended for integrated solid waste management (ISWM), as the recycling of certain uPoPs-contaminated wastes should be avoided to protect human health. Additionally, the lack of background or baseline information on contaminated lands caused by textile production or recycling makes it difficult to understand why this intervention on contaminated land is included.

32. Global - (Indonesia, Jordan, Peru, Serbia, Uganda, Ukraine): The Global Greenchem Innovation and Network Programme, UNIDO (GEF Program Financing: \$12,600,000) (GEF ID: 10353)

✓ **United States Comments:**

- We agree with multiple aspects of the STAP assessment, including important dissonance in project objectives that require resolution, the internal inconsistencies in the estimation (and units) of global environmental benefits expected from the project, and the lack of clearly defined activities to overcome the significant barriers to project success that are presented.

✓ **Norway/Denmark Comments:**

- We welcome this project, which may reduce toxic waste in manufacturing sectors and have a positive impact on manufacture workers' and consumers' health conditions. Many industrial actors in these sectors not only consume considerable amounts of toxic chemicals, but they also have an often-untapped potential for recycling which, if realised, would provide an important contribution to a circular economy.
- In Uganda, Norway has been supporting the National Environment Management Agency (NEMA) in the development of the new National Environment Act and various waste regulations and standards through the Oil for Development Programme. We suggest that this project involves NEMA in a discussion about alternative chemicals and environmental standards in Uganda.
- We also encourage engagement with the tripartite partners to ensure adherence to international labour standards on occupational safety and health and strengthen dialogue on work-related issues.
- Finally, as a firm supporter of the UN Delivering as One, Norway assumes that UNIDO will coordinate its efforts with the UN Resident Coordinator's Office and the rest of the UN Family.
- We would stress the need to properly coordinate with other GEF investments that support moving towards a circular economy. It is vital to remove toxic

chemicals from materials to be recycled. Only then can a clean circular economy be achieved. The circular economy must avoid the recycling of harmful substance.

- We commend this significant step forward for GEF investments in chemicals and wastes as the project targets "pre-pipe" measures to design out the use of toxic chemicals that prevent the safe end of life management of them. The presence of POPs in products and production processes risk emissions of POPs and mercury along the entire lifespan of the product from cradle to cradle.
- The term Green Chemistry is not always clear in its practical application. Key to the environmental success of the project will be the implementation of the Stockholm Convention, the Minamata Convention, and preferably also other chemicals regulations such as REACH.

✓ **Germany Comments:**

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

- Sources of co-financing: The explanations for where and how 78 Mio USD of Co-financing are mobilized, are not satisfactory. Components 2 and 3 very much depend on it. Please justify and prove that these amounts can be raised.
- For component 3:
 - The combination of POPs, mercury and microplastic is not clear, nor is the strict focus on just three industry sectors (textiles, metal working and Building insulation). Please explain your choice of focus compounds and sectors.
 - A more detailed explanation is needed regarding microplastic. The sources of microplastic which are in the focus of the programme need to be specified and the general approach outlined, how the problem can be tackled.
 - Green Chemistry alternatives are highlighted to substitute conventional and hazardous chemicals and processes. Please indicate whether those alternatives/best practices already exist or shall be developed during the programme, and how these alternatives will be evaluated prior to replacing conventional approaches in the production line. Please provide an overview which approaches of identification, R&D and implementation will be used.
 - Since 2015 (Agenda 2030, Paris Agreement) Sustainable Chemistry is considered State of the discussion, please consider incorporating the SDGs in the programme, which would also help to strengthen - amongst others - the gender aspect.
- Indicator 9: Please explain how the stated amount of reduction, disposal/destruction, phase out, elimination and avoidance of chemicals was estimated and to which industries it refers.

- Output 1: The choice of partners in the network is not clear. The International Sustainable Chemistry Collaborative Centre (ISC3) in Germany has already implemented the approaches proposed here and should be incorporated in the programme execution.
- Output 2.1.2 / 2.1.3: Paragraphs 47 and 49 are identical, please correctly describe Outputs 2.1.2 and 2.1.3

✓ **Japan Comments:**

The below comments from Japan were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Programs and Projects in Chemicals and Waste focal area are barred from producing the global environmental benefits indicated in the Project Identification Forms (PIF) due to the COVID-19 outbreak, as many developing countries have suspended recycling and waste treatment, in an effort to reduce the risk of waste-treatment workers against COVID-19 virus infections. As a result, wastes including single-use plastic, medical wastes and hazardous materials have surged, resulting in widespread and illegal dumping and storage (a phenomenon which does not happen in Japan). According to our own experts, these problems are caused by a lack of technology and infrastructure (including automated intermediate treatment technology and Waste-to-Energy facilities such as incinerators), weak regulatory systems and low awareness among stakeholders. From this context, Projects (GEF ID: 10353, 10519, 10523, 10543) should be based on developing alternative scenarios that focus on sustainable recycling and waste treatment practices, taking into account pandemic risks arising from the COVID-19 outbreaks, to achieve the Global environmental benefits envisioned in the PIF. We recommend that programs in this focal area build stronger partnerships with various relevant stakeholders to address such root causes under the COVID-19 outbreak.
- On project 10353 (*Global Greenchem Innovation and Network Programme*): This global program should also address Core Indicator 6, taking into account GEF-7 Programming Directions to maximize global environmental benefits that contribute to the objectives of multiple environmental Conventions (aim for impact similar to Project 9373 -- *Guidance Development and Case Study Documentation of Green Chemistry and Technologies*)

33. Regional - (Bangladesh, Indonesia, Pakistan, Viet Nam, Asia/Pacific): Reducing uses and releases of chemicals of concern, including POPs, in the textiles sector, UNEP (GEF Program Financing: \$8,850,000) (GEF ID: 10523)

✓ *Norway/Denmark Comments:*

- Globally, the textiles sector is a major source of pollution. The project focuses on a region with a significant share of the world's textile production and is thus highly relevant.
- We welcome the approach to address reductions in the use, release and exposures of not only POPs, but also CoCs (Chemical of Concerns).
- We find it particularly interesting that the project will work to scale up approaches that are already working within certified voluntary schemes. We underline that the schemes chosen must maintain a high standard.
- We also welcome that the project will enable and strengthen national capacities to comply with requirements under the Stockholm Convention "on current and future POPs" as well as preventing harmful impact from other CoCs, and further facilitate a circular economy.
- There should be more detail on the work at the national level. There seems to be focus on working within geographies, within regions, and on a global level. But little effort is made to link the work with national level policy. In Bangladesh, and possibly in all the countries in the region, policies that relate to textile etc. are determined by the specific ministries, departments that carry the mandate to set industry rules and regulations. Therefore, with regard to policy level changes that this Project wants to trigger, we would like to suggest that enough efforts should be put into influencing and lobbying national policies and engaging with legislation on a national level.
- There should be an assessment of the groundwork that is needed from the individual country's side and from UNEP to identify gaps and needs in institutional capacity in the sector. Besides, the baseline (Institutional capacity, information gathering, synthesis and dissemination of PCB and other chemicals data etc.) is likely to be different from country to country. This information could be specified in the document to better understand the Project's approach, or how will that be addressed by the project.
- We would also like to mention that another GEF Project through UNIDO is currently supporting the work of the Bangladesh Government on PCB (a hazardous chemical listed in Stockholm Conventions on POPs). We would strongly encourage this UNEP proposed project to also maintain liaison with UNIDO and the Bangladesh Department of Environment, which is implementing the elimination of PCBs in the country's electrical sector.
- In general, UNEP could have specified more clearly its implementation role on each country level. As we understand UNEP has no office in Bangladesh.

✓ **Germany Comments:**

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

Germany welcomes the proposal which aims to better management and transparency of chemicals in the textile sector.

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

- Outcome 1: In the outcome tier 2 and 3 SMEs are requested to phase out CoCs. More emphasis needs to be put on the role of textile association(s) to define their sectoral requirements regarding the handling of CoCs. The exchange between associations and chambers of textile industry and chemical suppliers should lead to the development of a common Code of Conduct for CoCs (incl. labelling, CAS numbers etc.).
- Outcome 2: National actors (e.g. Ministry for Commerce) should be supported to facilitate the dialogue between chemical suppliers and textile industry to improve enabling conditions and achieve better transparency in the labelling of chemicals. The concept of Responsible Care as ICCA's contribution to the Strategic Approach to International Chemicals Management (SAICM) reflects the current state of discussion and should be included.
- There are further opportunities for co-operation and synergies with other projects: The BMZ funded Regional Project "Sustainability in the Textile and Clothing Industry in Asia" (PN 2018.2056.2) focuses on chemical management in the textile industry in various Asian countries.

✓ **India Comments:**

- In respect of the Regional, Bangladesh, Indonesia, Pakistan, Viet Nam, Asia/Pacific: Reducing Uses and Releases of Chemicals of Concern, Including POPs, in the Textiles Sector, UNEP (GEF Project Financing: \$8,850,000) (GEF ID: 10523), the project locations in Pakistan are not finalized. However, the map in the PIF document, at page 67, shows the Pakistan occupied Jammu and Kashmir, which is a part of India under the illegal occupation of another country, as part of Pakistan and would prima facie amount to a violation of India's Constitution, sovereignty and territorial integrity. For this reason, we record our objections to the map in the PIF, and for this reason oppose the project and do not join the Council for approval of the project with respect to Pakistan. We further oppose the approval of any component of the project, once locations are finalized, if such location should fall in Pakistan occupied Jammu and Kashmir, which is a part of India under the illegal occupation of another country.
- We have also noted that all projects that are approved by the Council and endorsed by the CEO should be consistent with the GEF instrument and GEF

policies and procedures. We would like to understand from the GEF Secretariat whether GEF has a specific policy regarding projects in disputed areas. If such a policy exists, we would like a confirmation that all the above projects are as per such policy. If such a policy does not exist, we would like to understand the impediment, if any, in GEF Sectt following the principles under the well-established World Bank Operational Policy on Disputed Areas (OP 7.60).

✓ **United Kingdom Comments:**

- **Bangladesh** – It will be important to consider implementation and enforcement – without which regulations and capacity building is ineffective.
- **Pakistan** – It is the role of government to see that these eco-innovative strategies are implemented and reported on regularly. UK would ask that the project leads ensure government plays a role.

✓ **Japan Comments:**

The below comments from Japan were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Programs and Projects in Chemicals and Waste focal area are barred from producing the global environmental benefits indicated in the Project Identification Forms (PIF) due to the COVID-19 outbreak, as many developing countries have suspended recycling and waste treatment, in an effort to reduce the risk of waste-treatment workers against COVID-19 virus infections. As a result, wastes including single-use plastic, medical wastes and hazardous materials have surged, resulting in widespread and illegal dumping and storage (a phenomenon which does not happen in Japan). According to our own experts, these problems are caused by a lack of technology and infrastructure (including automated intermediate treatment technology and Waste-to-Energy facilities such as incinerators), weak regulatory systems and low awareness among stakeholders. From this context, Projects (GEF ID: 10353, 10519, 10523, 10543) should be based on developing alternative scenarios that focus on sustainable recycling and waste treatment practices, taking into account pandemic risks arising from the COVID-19 outbreaks, to achieve the Global environmental benefits envisioned in the PIF. We recommend that programs in this focal area build stronger partnerships with various relevant stakeholders to address such root causes under the COVID-19 outbreak.
- On project 10519 (*Reduce the impact and release of mercury and POPs in Vietnam through lifecycle approach and Ecolabel*), Project 10523 (*Reducing uses and releases of chemicals of concern, including POPs, in the textiles sector*), and Project 10543 (*Promotion of circular economy in the textile and garment sector through the sustainable management of chemicals and waste in Lesotho, Madagascar and South Africa*) :

These indicate extremely low targets in Core Indicator 9 and 10, compared to the GEF-7 target (Indicator 9: 100,000 metric tons of POPs reduction, Indicator 10: 1,300 gTEQ of reduction of u-POPs), i.e., ID:10519: 35.01 tons (Indicator 9), ID: 10523: 25 tons (Indicator 9), 2.30 gTEQ (Indicator 10), ID:10543: 5.5 tons (Indicator 9), 11.50gTEQ (Indicator 10): These values are significantly less than the other GEF-7 CW projects whose PIF have already been approved.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- As the term ‘circular economy’ has no single definition, it is difficult to understand what is meant by the multiple references to project activities contributing to ‘the circular economy’.
- We believe the likelihood of Risk 1 in Table 3 to be high, and that the lack of incentives for SMEs to use the chemical information sharing platform was a key lesson from the China textiles project. In our view, most SMEs are not ready to develop a CSR strategy.
- We see the likelihood of Risk 2 in Table 3 also to be high, and therefore recommend particular attention to risk mitigation, particularly in countries in which the garment export industry plays a key role in economic growth and employment.
- In Bangladesh, it may be helpful to additionally coordinate with stakeholders who, in addition to the government, now hold some oversight responsibility within the garment export industry associations, including Bangladesh Garment Manufacturers and Exporters Association (BGMEA), and Bangladesh Knitwear Manufacturers and Exporters Association (BKMEA). Importantly, we understand these oversight roles include the ability to award or suspend export certificates.
- We feel that some elements of innovation (including funding to adopt new, more water efficient, less environmentally harmful technology, such as the use of lasers instead of acid and water to distress or “wash” jeans) would likely be more persuasive than the new business opportunities or information exchanges proposed here.
- We are not convinced that the promotion of regional cooperation will produce marked improvements in the enabling environment to provide incentives for the phase out of CoC. Especially in the wake of COVID-19, factories and workers are focused on month-to-month survival. Additional information on how to mitigate the impacts of COVID-19 would be helpful.
- Regarding stakeholder involvement, within Bangladesh we suggest that Bangladesh Garment Manufacturers and Exporters Association; Bangladesh Knitwear Manufacturers and Exporters Association be engaged. Local Bangladeshi CSOs should also be identified, and the project should endeavor to

work directly with factory workers – not only worker committees - which can be dominated by management.

- To enhance the long-term sustainability of this project we recommend directly funding factory upgrades that would allow separate storage or safe disposal of existing stores of chemicals or buying them back. Further, we are unconvinced that SMEs will uniformly use transparency tools and suggest if such information is crucial to the project, perhaps manufacturers would accept someone from the project working in their factory to input data for a period.

34. Viet Nam: Reduce the impact and release of mercury and POPs in Vietnam through lifecycle approach and Ecolabel, UNDP (GEF Program Financing: \$4,600,050) (GEF ID: 10519)

✓ **United States Comments:**

- We are supportive of this well-prepared project. However, we do note periodic inappropriate characterizations of a circular economy approach throughout the document, as one that excludes safe disposal of hazardous waste. For example, there is references to the contamination by mercury and POPs as “hindering a full development of circular economy in Vietnam due to the fact that material potentially contaminated by POPs and mercury is unsafe for reuse or recycling into new products”. This is unfortunate, as the environmentally safe disposal of mercury, including those activities covered by the Minamata Convention on Mercury, in no way ‘hinders’ progress towards more sustainable consumption and production models.

✓ **Norway/Denmark Comments:**

- The project is highly relevant for Vietnam. It aligns with Vietnamese priorities in green growth addresses an important gap in Vietnam, i.e. the mercury emission.
- The project needs to work closely with other ministries, business associations and partners in addition to MONRE and MOH.
- Cooperation/synergies with other projects in Vietnam, including earlier GEF projects, particularly the lessons learnt from the earlier GEF project “Vietnam POPS and sound
- harmful chemicals management project (PIMS5154)” and the UNDP Norway supported on-going project “Scaling-Up a Socialised Model of Waste Management in Five Cities in Viet Nam” (DWP5C) should be taken into account.
- We note with interest the approach to support the work through an EcoLabel system. There is usually quite a leap from implementation of the Stockholm Convention to what is normally required in order to comply with ecolabel

certification. We would therefore be very interested in the lessons learned from this project.

✓ **Germany Comments:**

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

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

- Component 1, Indicator 1.1: Following the polluters pays principle, industries importing or manufacturing products containing hazardous chemicals, difficult to be recycled, or generating large amount of waste, should be obliged through EPR systems or direct fees to take over responsibility for the appropriate management of these substances and materials at their end of use. In the final project proposal, the strategy for establishing and enforcing such elements and for safeguarding the effective use of funds to be generated should be elaborated in detail.
- Component 1, Indicator 1.2: The existing legislation in Viet Nam still does not envisage the phasing out of such devices as foreseen under the Minamata Convention. The final project proposal should therefore explain more explicitly, how the policy level will be addressed for creating the necessary legal framework conditions for the necessary phase out of mercury.
- Component 3, Indicator 3.1: As part of mercury lifecycle management, the current scope of the project covers collection, segregation and storage with reference to mercury containing lamps and medical devices. From a safeguards' perspective, a) the scope of the project should be broadened: Especially for medical devices containing liquid mercury, the scope of the project should foresee the conversion of mercury into mercury sulfide for safe disposal, preventing different kinds of possible leakages. In the case of fluorescent lamps, the concentration of mercury is much lower. Nevertheless, the project in order to achieve the necessary environmental standards should b) consider best available technologies for decentralized treatment, comprising an obligatory thermal treatment after crushing to bind the vaporous mercury through activated carbon as well.

✓ **Japan Comments:**

The below comments from Japan were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Programs and Projects in Chemicals and Waste focal area are barred from producing the global environmental benefits indicated in the Project Identification Forms (PIF) due to the COVID-19 outbreak, as many developing countries have suspended recycling and waste treatment, in an effort to reduce

the risk of waste-treatment workers against COVID-19 virus infections. As a result, wastes including single-use plastic, medical wastes and hazardous materials have surged, resulting in widespread and illegal dumping and storage (a phenomenon which does not happen in Japan). According to our own experts, these problems are caused by a lack of technology and infrastructure (including automated intermediate treatment technology and Waste-to-Energy facilities such as incinerators), weak regulatory systems and low awareness among stakeholders. From this context, Projects (GEF ID: 10353, 10519, 10523, 10543) should be based on developing alternative scenarios that focus on sustainable recycling and waste treatment practices, taking into account pandemic risks arising from the COVID-19 outbreaks, to achieve the Global environmental benefits envisioned in the PIF. We recommend that programs in this focal area build stronger partnerships with various relevant stakeholders to address such root causes under the COVID-19 outbreak.

- On project 10519 (*Reduce the impact and release of mercury and POPs in Vietnam through lifecycle approach and Ecolabel*), Project 10523 (*Reducing uses and releases of chemicals of concern, including POPs, in the textiles sector*), and Project 10543 (*Promotion of circular economy in the textile and garment sector through the sustainable management of chemicals and waste in Lesotho, Madagascar and South Africa*) :

These indicate extremely low targets in Core Indicator 9 and 10, compared to the GEF-7 target (Indicator 9: 100,000 metric tons of POPs reduction, Indicator 10: 1,300 gTEQ of reduction of u-POPs), i.e., ID:10519: 35.01 tons (Indicator 9), ID: 10523: 25 tons (Indicator 9), 2.30 gTEQ (Indicator 10), ID:10543: 5.5 tons (Indicator 9), 11.50gTEQ (Indicator 10): These values are significantly less than the other GEF-7 CW projects whose PIF have already been approved.

35. Mexico: Eliminate mercury use and adequately manage mercury and mercury wastes in the chlor alkali sector in Mexico, UNEP (GEF Program Financing: \$12,000,000) (GEF ID: 10526)

✓ *Norway/Denmark Comments:*

- We very much welcome this project. The project appears to have very tangible benefits by addressing an already identified 145 metric tons mercury, 53,700 metric tons contaminated material, and 43,186 metric tons CO₂e in two different chlor alkali plants in northern Mexico.
- Considering that Mexican operators usually have few incentives to upgrade to more environmentally friendly alternatives this seems like a very good use of resources.
- The chemical production industry has been in rapid growth in Mexico the last decade and had an annual production value of 20,4 billion USD in 2018. There is a government framework in place to control the kind of waste management that is discussed in this project, but there are legal loopholes and the current

government has other priorities. Mexico is also a signee to the Minamata convention on mercury (2013).

- As noted, this is the first chlor alkali project supported by the GEF and should therefore create important knowledge which must be made readily available to other countries to address their chlor alkali sectors. The sector leaves behind considerable amounts of waste and contaminated land when decommissioned.

✓ **Germany Comments:**

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

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

- Germany fully supports the proposal; it has great potential to phase out mercury use in Mexico in accordance with the Minamata Convention.
- There is one minor suggestion: Only SEMARNAT and institutions from the environmental sector are included. It may be good to evaluate with SEMARNAT if the inclusion of the Secretaría de Economía and possibly ANIQ (Asociación Nacional de la Industria Química) make sense. A broader base of government and private sector actors may improve the impact of the project.

✓ **United Kingdom Comments:**

An initial agency response to the below comments from the United Kingdom was provided and can be found in the list of documents specific to the project in the GEF Portal.

- It would be good to understand what government buy-in is for this project, and who the main counterparts are on the Mexican side. Is it the Environment Ministry SEMARNAT, the Agenda 2030 team in the President's Office or another ministry?

36. China: Environmentally Sustainable Development of the Iron and Steel Industry, World Bank (GEF Program Financing: \$25,000,000) (GEF ID: 10564)

✓ **United Kingdom Comments:**

An initial agency response to the below comments from the United Kingdom was provided and can be found in the list of documents specific to the project in the GEF Portal.

- We have one additional comment from UK colleagues in China on the above project. They don't feel the direct project outcomes justify the "global" public

good element, because this is more about toxic pollution locally (whereas the other project, for example, was more about global carbon sinks etc). However, they can see the global angle of the importance of meeting better environment standards within China and the knock-on benefits this has elsewhere, including in setting a president.

✓ **Japan Comments:**

The below comments from Japan were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- On single-country projects, especially with large stated co-finance ratios, and cyclical-industry-related projects, such as Project 10564 (*Environmentally Sustainable Development of the Iron and Steel Industry*) and Project 10544 (electric mobility addendum):

We anticipate that participants of these projects may be severely impacted by the COVID-19 crisis. How realistic are the published co-financing arrangements to be met, and for the industry to meet the higher operating costs - without de facto subsidization from the GEF?

- We would also like to stress the need for transparency and balanced involvement of private sector providers in any of these corporate projects (particularly highly cyclical sector projects such as the ones included in this work program in the steel and automobiles sectors), especially amid the COVID crisis, given that *all* such industry participants indiscriminately face severe business conditions. Projects should be carefully constructed and communicated, so that they are not deemed to infringe upon rules against subsidization of *particular* entities, thereby “reinforcing the market power of some targeted companies at the expense of other firms” (as per the rules). For example, “to de-risk investments in ...” in the project description/ objectives implies the potential of subsidization, highlighting the need for transparency in their construct and execution, so that they are visibly in line with GEF rules and regulations and the Private Sector Engagement Strategy to be adopted at this Council session. This type of crystal-clear communication/ governance-insurance measure is essential for the GEF to credibly raise funding for private-sector-driven projects in a tough financial environment.

INTERNATIONAL WATERS

37. Regional – (Georgia, Turkey, Ukraine): Fisheries and Ecosystem Based Management for the Black Sea - (FishEBM BS), FAO (GEF Program Financing: \$5,000,000) (GEF ID: 10558)

✓ Germany Comments:

Germany welcomes the proposal which addresses important fisheries issues in the Black Sea. The proposal identifies overfishing, illegal, unreported and unregulated (IUU) fisheries, and climate change as the main barriers for achieving resilient, productive, and sustainable fisheries in the Black Sea. For overcoming the barriers and achieving its goal, the project will raise data about socioeconomic aspects of fisheries, fish value chains, and IUU fisheries, support the capacities of commercial fisheries, with particular focus on small-scale fisheries, apply control and surveillance technology, implement national action plans to reduce bycatch and abandoned fishing gear, promote tools for ecosystem-based management, and share knowledge and best practices. Germany particularly appreciates the regional approach, focus on small-scale fisheries and the consideration of the entire value chain.

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

- The proposal identifies overfishing as one of the main barriers for sustainability in the Black Sea. The overall project objective is “to reverse the overexploitation of select commercial living marine resources by enhancing the capacity of Black Sea countries to manage fisheries, including through the application of ecosystem-based management tools”. Germany would like to seek clarification on which of the four components are contributing to the overall goal of reducing overexploitation and to which degree. For example, component 1 (strengthening the fisheries sector) would not appear to reduce exploitation.
- Related to this, core indicator 8 proposes “overexploited tonnes” as the metric to assess that overexploited fisheries move to more sustainable levels. Overexploitation has decreased in the Black Sea in the last years, but remains a widespread concern, as it is highlighted in the proposal itself. As there seem to be stock assessments available for priority species, F/FMSY, B/BMSY or other common reference points would appear to be a more meaningful metric than landings. Germany requests to either adapt the core indicator 8 or to include an explanation why landings instead of reference points from stock assessments have to be used and how the project will improve such assessments in the future.

✓ United States Comments:

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

38. Regional – (Brazil, Uruguay): Binational and integrated water resources management in the Merín Lagoon Basin and Coastal Lagoons, FAO (GEF Program Financing: \$4,850,000) (GEF ID: 10550)

✓ *No comments received.*

39. Regional - (Bosnia-Herzegovina, Montenegro): Sava and Drina Rivers Corridors Integrated Development Program, World Bank (GEF Program Financing: \$8,000,000) (GEF ID: 10553)

✓ **France Comments:**

- Favorable opinion with 1 question: “*investing in infrastructure improvements*” to address the flood risk issue: Could we have confirmation that this refers to green infrastructure/nature-based solutions, given that we are focusing on nature-based solutions (i.e., land management adaptation, improved soil infiltration, flood plains management, or meander restoration) rather than on gray infrastructure such as dams?

✓ **Canada Comments:**

- We recommend that, given that this project is focused on the disaster impacts that are exacerbated by climate change and how integrated cooperation and management can support improved resiliency, the proposal should note how supporting biodiversity conservation and the ecosystems services that provides would be beneficial in these efforts and achieving these outcomes.

✓ **Germany Comments:**

Germany requests that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement.

Germany acknowledges that the following project complements a larger World Bank investment program. Still, Germany remarks that the PIF is missing fundamental information that is considered necessary to make a valid assessment. In particular, Germany would like to draw attention to missing information regarding Part I. B. Indicative Project description summary and the detailed project description (1a under Part II. Project Justification). Furthermore, Germany is surprised that the PID only includes information on sub-components but not on specific outputs and indicators. The Sub-components from the PID do not fully correspond to the indicative outcomes and outputs from the PIF.

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

- Germany requires more information on the previously established Basin Management Plans and their role on Flood Protection to better identify the linkages to the proposed activities.
- Germany would appreciate further elaboration on the Component's contribution to the IW-Focal Area, particularly IW-3-7 on investments in water, food, energy and environmental security, which appears not to be covered by the proposal.
- Germany would like to see a better justification of the selection of the Rio-Marker for Climate Change Adaptation Score 2 and Mitigation Score 1. Climate change impacts with respect to more intense floods and prolonged droughts are mentioned in the PID description but are not explicitly included in the Outcome descriptions (PID) or Outputs (PIF). Activities mainly relate to flood management; however, it is not entirely clear how the project provides a principal contribution to climate change adaptation incorporating floods and droughts. Unfortunately, there is also no information on mitigation activities.
- Germany asks that additional mechanisms of public participation (e.g. for local communities) be included during the preparation and implementation phase of component 4 (among others, the 2nd Sava River Basin Management Plan), which have not been part of previous consultations in the World Bank Program. Germany would appreciate an explanation of how consultation and complaint mechanisms are planned within these management concepts.
- Germany asks for a more precise indication of the investments dedicated to grey infrastructure and to nature-based solutions (component 1-2).
- Germany would need to see more information on environmental and social safeguard assessments as the project is rated with an overall High Risk for both Environment and Society.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- CSOs and media have been reporting on the controversial construction of Small Hydropower Plants (SHPPs) in the area, and their environmental impact. We would recommend early involvement of CSOs and indigenous people in light of these recent controversies.
- We would additionally recommend coordinating with the Ministry of Agriculture, Forestry and Water Management of Republika Srpska.

40. Regional - (Cambodia, Viet Nam): Enhancing sustainability of the Transboundary Cambodia - Mekong River Delta Aquifer, FAO (GEF Program Financing: \$15,000,000) (GEF ID: 10520)

✓ **France Comments:**

Favorable opinion of the project's objectives with 2 questions/comments:

- This project aims to increase knowledge of the transboundary Mekong basin and strengthen cooperation between Vietnam and Cambodia. Is the Mekong River Commission, the international commission tasked with promoting and coordinating assistance for the management and use of water (from the Mekong basin), involved in all or a portion of this project?
- Do the project's five components (“(i) strengthening transboundary cooperation including joint fact finding and information exchange; (ii) enhancing groundwater recharge; (iii) supporting innovative solutions to optimize groundwater use, reverse salinization trends and increase resilience to climate change; (iv) reducing agri-pollutants contamination of ground and surface waters; (v) and contributing to protecting groundwater dependent ecosystems”) include an institutional approach or are they limited to a technical one?
- Does the project make provision for consideration of the type of water uses? One of the areas of focus covers the reduction of agricultural pollution (qualitative aspect); a broader consideration of the type of needs and withdrawals would also pave the way to address the quantitative aspect.

✓ **Germany Comments:**

Germany welcomes the initiative to advance the sustainable use of groundwater in the Mekong Delta and acknowledges that the exchange of approaches and solutions for shared groundwater challenges between Vietnam and Cambodia would be very beneficial.

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

- Germany requests taking into account that transboundary dynamics in the grand aquifer system in the Mekong Delta are marginal and that cross-border flows between Cambodia and Viet Nam only constitute a minor element in the groundwater balance of the Vietnamese delta. Local surface interactions like recharge through rain and rivers, as well as abstraction of groundwater through pumping have a far greater impact than cross-border flows.
- Germany acknowledges the importance of surface-groundwater interactions as described in the PIF. Germany would prefer consequently including investigations into surface-groundwater interactions addressing aspects of recharge and discharge dynamics as well as groundwater demand as project components.

- Germany suggests assessing the hydrogeological settings locally in the border region as useful joint activities that can establish the baseline for further coordinated governance of groundwater between Cambodia and Viet Nam in the border region.
 - Germany suggests the following addition to the project’s outputs: Output 1.1: Assessment of current state of Groundwater resources, recharge and extraction dynamics, “analysis of surface-groundwater interactions and the extent of connectivity across borders.”
- Germany is of the opinion that the limited availability of hydrogeological data for the Cambodian side of the aquifer should be addressed by the project.
- Germany proposes carrying out feasibility studies on managed aquifer recharge for the specific regions.
 - Germany suggests adding the following aspects to the project’s outputs: Output 2.1: Pilot demonstrations of innovative groundwater management and utilization “after adequate feasibility studies.”
- Germany would appreciate it if existing regional organisations like the Mekong River Commission (MRC) could be considered as regional partner organisations for data sharing, and to avoid the creation of redundant bilateral bodies and duplication of water management plans.
 - Germany suggests adding the following aspects to the project’s outcomes: Outcome 3: Agreed upon arrangements for transboundary cooperation “embedded in existing transboundary mechanisms and organisations.”
- Germany would prefer it if the project could account for the risk that improved irrigation systems and advocacy for groundwater use, as potentially through co-financed projects listed in this proposal, might increase groundwater abstraction rates. Germany further suggests working towards improved groundwater management policies and licensing as a management tool to address these developments.
- Germany would like to extend an invitation for consultation with the German BGR.

41. Regional - (Georgia, Moldova, Turkey, Ukraine): Blueing the Black Sea (BBSEA), World Bank (GEF Program Financing: \$6,392,694) (GEF ID: 10563)

✓ **France Comments:**

- Favorable opinion of the premise (objective to reduce pollution and strengthen regional dialogue on this topic); however, the level of detail in the description does not allow for a true understanding of the project content.

✓ **Germany's Comments:**

Germany requests that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement.

Germany welcomes the continuous efforts to reduce pollution levels in the Black Sea by working with public and private actors across the riparian states. Germany acknowledges that the following project complements a larger World Bank investment program. Still, Germany remarks that the PIF is missing fundamental information that is considered necessary to make a valid assessment. In particular, Germany is missing information regarding *Part I. B. Indicative Project description summary* and the detailed project description (1a under Part II. Project Justification). Furthermore, Germany regrets that the PID only includes information on sub-components, but not on specific outputs and indicators.

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

- Germany requires clarification of the co-financed amount of 291,430,000 USD as mentioned in the PIF, which is not mentioned in the additional document “World Bank PID”. Germany requests a description of how this proposed project is situated within on-going and co-financed programmes of the World Bank or other partner institutions.
- Germany would appreciate a description of planned activities. Specifically, a detailed definition of design criteria and consultation processes for “*preparation of investment plans for pollution prevention and circular economy*” and “*preparation of cross-sectoral coordination mechanisms*” should be provided for specific countries and sectors.
- Germany requests a detailed description of specific planned activities for capacity development to strengthen national capacity for monitoring and enforcement of regulations within a theory of change.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- We are unclear as to what sort of investment plans for pollution prevention or reduction could be adopted by countries under circular economy or following a blue economy approach, because of the varying definitions/approaches adopted under circular economy depending on the country and context. We would appreciate greater clarity on this in the subsequent stage of proposal development.

42. Regional - (Burundi, Congo DR, Rwanda): Lake Kivu and Rusizi River Basin Water Quality Management Project, AfDB (GEF Program Financing: \$5,736,073) (GEF ID: 10566)

✓ **France Comments:**

- Favorable opinion. One comment: “The project will enhance water quality monitoring capacity and regional and local levels and promote catalytic investment in the water-food-energy nexus to improve the water quality in the lake”: Particular attention could also be paid in the project to Integrated Water Resource Management (IWRM - management model advocated by France), which could be complementary to the nexus approach.

✓ **Canada Comments:**

- The project proposal references engaging with local leaders in the project identification phase but does not mention engaging with indigenous peoples and local communities (IPLC) nor does it reference IPLC engagement in future steps. The lack of inclusion/consideration of IPLCs in the project information form is a concern and this gap should be addressed moving forward.

✓ **Germany Comments:**

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

Germany welcomes this proposal, which addresses the water quality and institutional capacity challenges in the Lake Kivu and Ruzizi River Basin. Germany commends this proposal for its in-depth information and comprehensive outlook. Germany appreciates this proposal’s acknowledgement of the current activities undertaken in the basin, which are co-financed by the EU and Germany (BMZ) and implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and welcomes the plans to coordinate and complement this activity. At the same time, Germany asks that the following comments be addressed.

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

- While the proposal accurately represents the indicative sources of co-financing for the project, Germany requests that the Investment mobilized in reference to the GIZ implemented project be written as “EU/BMZ investment mobilized” and the amount be adjusted to 2,378,550 EUR. Germany also suggests that the in-kind expenditures of the Governments of Rwanda, DRC, and Burundi are re-examined due to their relatively high amount compared to current national expenditures in the basin.
- Germany appreciates the proposal’s acknowledgement and coordination with the EU/Germany’s existing activity but kindly points out that the EU/Germany

activity is anticipated to conclude December 2020 and will thus not overlap with the implementation of this proposal.

- Germany suggests that the proposal takes into further account the high risk of the weak managerial capacity of the executing partner, ABAKIR. Germany suggests that ABAKIR receives additional support from other national entities in managing its responsibilities in this proposal, including the creation of a laboratory for lake water quality monitoring (output 2.1.3) and M&E Knowledge Management (Component 4).

✓ **United Kingdom Comments:**

Rwanda – Relations between DRC, Burundi and Rwanda are very often tense and so there are risks working in the area, therefore we have a few comments:

- There are significant differences in approach between regional approaches and approaches at national level when it comes to the management, development and use of shared water resources. It will be important to identify specific context and political risks and how to mitigate them. Regional political tensions in the Great Lakes has been on and off in the last 30 years.
- Most water development, management and use occur at local and national scales, rather than regional. A primary objective should be to develop and support technical capabilities at these scales.
- National governments should ensure that their water administrations engage with water using sectors and other stakeholders to ensure that their interests are communicated and considered in cross border interactions. There is almost no cooperation between Burundi and Rwanda, and this make it difficult to discuss development projects.
- We recommend to the team managing the project that political and contextual risks are real and strategies to mitigate them should be put in place.

West and Southern Africa – There should be careful consideration of the tensions in the region. More detail on what the Programme has in mind to reduce conflict and build peace using non tradition methods would be helpful.

Kinshasa – The project leads started to engage with the UK DFID programme CRIDF. UK colleagues in Kinshasa advise that the two programmes connect.

On the political side- there are sensitivities around the Ruzzi hydropower developments- mostly DRC's concern that they are losing from this development but think this study could be beneficial to DRC.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

- With energy and mining companies as co-financers and/or contributors to water quality monitoring, we would recommend the development of a baseline water quality study conducted by an independent expert, as well as continued independently verified state of the basin reports each year thereafter. The recommended baseline study should report test results for a very wide range of pollutants, including those related to mining and oil and gas exploration, and would present an opportunity for community engagement (e.g. citizen science) to help build transparency and trust. Results of water quality testing should be posted on-line and shared with key local stakeholders on a regular basis.
- We wanted to note some statements we believe to be inaccurate, in hopes that they could be clarified in the next proposal stage. The table on page 7 seems to incorrectly suggest that REG is a private sector entity. We understand that ContourGlobal's KivuWatt Phase II (75MW) is in fact no longer in Rwanda's generation plan. Finally, we do not believe that Rwanda reached a target of 563MW in 2017, as stated on page 33.
- We were surprised to not see mention of the 56MW Shema Power Lake Kivu (formerly Symbion) project in this document, which has commenced construction activities and is farther along than the Gasmeth project.

43. Regional - (Bolivia, Brazil, Paraguay): Transboundary cooperation for the conservation, sustainable development and integrated management of the Pantanal - Upper Paraguay River Basin, IADB/ UNEP (GEF Program Financing: \$8,190,000) (GEF ID: 10554)

✓ **Germany Comments:**

Germany welcomes the regional programme, which aims to increase water security especially by promoting cooperation between the countries in the Pantanal basin.

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

- Germany recommends carrying out a Human Health and Environmental Risk Assessment in order to understand the environmental risks arising from contamination of the Pantanal through organic contaminants (pesticides, methylmercury), inorganic contaminants and sewage. In doing so, the final project proposal would benefit from including risk mitigation through policies for source control and remediation measures.
- Germany is firmly convinced that a thorough reassessment of the intervention area would be useful, as 650 ha seems to be very small compared to the total area 1,500,000 km² of the Pantanal mentioned, especially considering the level of investment, as this would mean a per ha investment of GEF funds-Funds of 12,615 USD.
- Germany is pleased with the transboundary approach of this project. At the same time, Germany would appreciate a more detailed explanation of the added

value of a tri-national (instead of a bi-national) multilevel governance approach, as well as the careful consideration of country ownership, the financing of this organizational structure, and the post-project prospects of the monitoring system.

- Germany would prefer if the theory of change could be strengthened, i.e. that main problems, main causes, the main project objective and the identified solution clearly relate to one another, and that a capacity needs assessment is included.
- While Germany welcomes the ambition of the project to address climate change, biodiversity, IWRM, SDG6, water security, and transboundary water governance, the project would benefit from being more focused on the objective to achieve transboundary water governance and evaluate which methodological approach fits the problem.
- Germany would like to see a strategy on how to engage with the private sector (e.g. water stewardship) against the backdrop of current policies in the three countries incentivizing private sector actors to expand the agricultural frontier.
- Germany recommends integrating the project's contributions to international agendas such as CBD and NDCs in light of the project objectives towards climate change and biodiversity.

✓ **United Kingdom Comments:**

- Bolivia - The Pantanal has been classified as a Ramsar Wetland of International Importance, a convention that Bolivia is a part of, which makes the wetland highly important to the government regardless of any future political changes that might occur. The Pantanal is also a very important region for the maintenance of the Chiquitano forest, which is one of the focal points for environmental action this year in Bolivia due to the large-scale wildfires that occurred in both areas last year. Given the Pantanal's vast biodiversity of flora and fauna species, and its role in converging large ecosystems from both the Chiquitano forest and Chaco, a proper integrated management system would be beneficial for Bolivia.
- Country wise, it will also be important for the project to focus on mitigating pressures from approximately 350,000 inhabitants existing in this area, while maintaining the freshwater ecosystem services and supporting the management of protected areas that generate governance and guarantee compliance and connection with local social actors. In addition, the watershed management is a concept already internalised within government and part of national public policies. Opportunities to collaborate with the protection of the Ramsar Convention and to strengthen the country's compliance with the UN framework are also desirable. Finally, there are several national and social actors developing work in the area. One of these is WWF, with whom the project would also receive support or establish a future alliance.

MULTI-FOCAL AREA

44. Kenya: Eldoret-Iten Water Fund for Tropical Water Tower Conservation, IFAD (GEF Program Financing: \$2,630,139) (GEF ID: 10209)

✓ United States Comments:

- We would like to see enhanced clarity on how these water funds will become financially sustainable after conclusion of GEF (and other partner) financing. Without some sort of continued revenue stream accruing to local governments/stakeholders, the water funds are likely to continue to be dependent on donor aid, with implications for the sustainability of global environmental benefits beyond the life of the project.

✓ United Kingdom Comments:

- There is a potential for political and delivery risk due to the contested nature of land rights in e.g. Mau Forest Complex. Has this been considered? We just need to be sure that risks are being managed.

45. Madagascar: Biodiversity Conservation, Restoration and Integrated Sustainable Development of Lower Mangoky and South-Mananara watersheds, FAO (GEF Program Financing: \$7,334,246) (GEF ID: 10371)

✓ Germany Comments:

Germany welcomes the proposal which aims at promoting integrated land use management and biodiversity conservation in southern Madagascar while at the same time ensuring alternative livelihoods options and inclusive businesses.

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

- Germany recommends making clear references to the Malagasy climate change adaptation framework, such as the National Adaptation Plan (PNA), that is very likely to be endorsed during the next phase of finalizing the project proposal. This would allow to align the proposed project activities/ directly link them to the PNA implementation and to make use of the strong conceptual links in between the biodiversity and the adaptation action agenda (ecosystem-based adaptation, etc.).
- Germany kindly requests to include in the stakeholder consultation an exchange and coordination meeting with the country donor group on biodiversity and environmental issues in Madagascar, as some of the complementarities to existent projects in the intervention are made; however, the presented overview of on-going activities is incomplete and promising synergies could be made use

of, e.g. in terms of German development cooperation with regard to the following ones:

- next to the mentioned PAGE program on natural resources management that has i.a. extensively worked in the Atismo Andrefana region and has clear lessons learned to build upon (e.g. land use plans at community-level), further synergies are given to the PrADA project (not yet mentioned in the proposal) that cover several of the mentioned value chains with climate smart agricultural practices in other regions (South East) which the GEF project also intends to address.
- As bad governance and corruption has been identified as one of the indirect drivers of wildlife overexploitation, we recommend to sort exchange with the ProDeCID project working at national and subnational scale on good governance and anti-corruption (e.g. in the Analamanga region).
- Germany also recommends with regard to the further stakeholder consultations to clearly outline how and which mining companies will be involved in the consultations, as mentioned in the proposal, as this is a quite sensitive issue in the Malagasy context.
- Concerning the presented technical approaches Germany recommends elaborating more extensively on how the project will exactly incentivize behavioral change on the ground in terms of providing real income-generating alternatives or “business cases” (e.g. to deforestation) including new production patterns (e.g. adjusted agricultural practices) that imply initial investments or higher risks and transaction costs in the transition or market development phase for beneficiaries. Several context-specific challenges, such as land rights or the difficulty of translating “biodiversity metrics” into actionable options that reduce persistent pressures on resources, are not adequately covered in the proposal. Germany asks to elaborate more coherently on the project approach in this regard and to consider more strongly the different ecosystem characteristics in the different project regions and on how to raise awareness and communicate the FLR approach at community level (so far low level of consideration).
- Germany strongly welcomes that synergies with GCF projects under development are already considered; however; as the mentioned IFAD GCF proposal is still under development and not yet approved, Germany kindly asks to plan this Germany project in a way that it is complementary, but not depending on the planned DEFIS + intervention.
- With regard to a gender-sensitive approach, Germany welcomes that the proposed project builds upon a sufficient provision for local ownership, including gender sensitive groups. Key stakeholders at any level are considered and the proposal also integrates women into planning and coordination.

46. Turkey: Strengthening the Conservation of Biodiversity and Sustainable Management of Forest Landscapes in Turkey’s Kazdağlari Region, FAO (GEF Program Financing: \$4,657,534) (GEF ID: 10369)

✓ **Canada Comments:**

- We recommend that implementation of this project considers lessons learned from the experiences of both the Yalova and Bucak Model Forests to the North and South. Both are members of the International Model Forest Network (IMFN) and the Mediterranean Model Forest Network (MMFN) since 2011 and 2015 respectively. In terms of knowledge dissemination and upscaling activities, the IMFN is a voluntary global community of practice whose members and supporters work toward the sustainable management of forest-based landscapes and natural resources through the Model Forest approach.
- Additionally, this project should mention the specific ecosystems and/or species benefitting from this work.

✓ **Germany Comments:**

Germany would like to acknowledge the relevance of the proposed objective and components. We commend the holistic approach take to biodiversity protection in the project.

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

- The formulation of the indicators should be clearer and quantifiable – the indicators should be revised once the baseline referenced in various indicators is established. Example: Modular training programme on protected areas and landscape management designed, applied in Kazdağlari Region and institutionalized within MAF for applying to other regions.”
- Indicators under 2.3. should read “additional xx ha established”
- Indicator on training impact is missing.
- Gender: v) GEB references: “At least 1,500 direct beneficiaries of project activities (Core indicator 11, with a target of 50% women beneficiaries)” – this is not reflected in the logical framework.

47. Regional - (Africa, Burundi, Congo DR, Tanzania, Zambia): Biodiversity conservation, sustainable land management and enhanced water security in Lake Tanganyika basin, UNEP (GEF Program Financing: \$14,599,083) (GEF ID: 10388)

✓ **France Comments:**

- Favorable opinion with recommendation includes a sanitation-wastewater treatment dimension with a view to improving resource quality.

✓ **Canada Comments:**

- The focus on supporting a network of community-based co-managed fisheries areas in the key fish biodiversity areas of Lake Tanganyika has high merit, but the proposal should clarify how this would improve upon the existing system and contribute to biodiversity conservation as an outcome.
- The other focus of the project concerning management interventions in protected areas to address threats and barriers to conservation and sustainable use of the lake and its basin area, and increasing incentives for communities to invest in long-term stewardship, should what specific activities would be undertaken, and what the exact outcomes would be.
- Additionally, implementation of this project should consider the following:
 - Strengthen coordination: Support the Lake Tanganyika Authority (LTA) and its Secretariat to coordinate and monitor sustainable management of the lake.
 - Pollution control: Support wastewater management in Bujumbura (Burundi), Kigoma (Tanzania) and other areas where it is deemed critical.
 - Sedimentation control: Support sediment management through catchment management interventions in the critical regions (e.g. Uvira (DRC), Kigoma and Rukwa (Tanzania), and Mpulungu and Kaputa (Zambia)).
 - Sustainable fisheries: Introduce and promote adoption of sustainable and responsible fishery co-management regimes around the lake.
 - Strengthen Institutional and Regulatory Frameworks: Support policy processes to facilitate implementation of the Convention on Sustainable Management of Lake Tanganyika, and the establishment and implementation of environmental monitoring programs.
 - Strengthen institutions and mechanisms for management of transboundary resources (the lake and its watershed), policy reforms for improved management of transboundary resources (integrated water resources and land management), and joint planning to capture efficiencies and synergies, as well as catalyze priority transboundary investments.
 - Support the establishment of an information base for governance and growth.

✓ **Norway/Denmark Comments:**

General comments:

- The project is highly relevant, and the context description is good. The Tanganyika lake and basin is a precious ecosystem upon which millions of people depend.
- It can be questioned if the scope of the program should be more focused, given the available budget to be shared between technical support and investments in four countries. There also seems to be a risk of high operational costs in the current set-up. Resources are spread out thinly and this might have an impact on cost effectiveness of the program.
- The PIF lacks a theory of change that can meaningfully bring together the number of activities taking place in individual localities in a vast basin. It seems to be too thematically fragmented and the interventions lack geographical scale to see this as a joint programmatic approach.
- Potential existing partner programs have not been sufficiently identified – an indication that the planning has not been optimal. The number of beneficiaries is also very low and poverty is a key factor leading to poaching. Is this targeted number sufficient to ensure proper management of the ecosystem?
- We question the realism in the stated co-funding (at least in DRC from national entities and CSO).

Detailed comments:

- We notice that several national entities are identified as implementing partners in DRC. National entities are considered high risk from a fiduciary perspective. How will UNEP ensure strong and efficient follow up of the project given the lack of presence in DRC?
- The project builds upon previous GEF-investments. What has been achieved in terms of results with previous investments and what lessons learned can be drawn?
- For any work related to the Itombwe reserve, we would like to stress the importance of good understanding of the dynamic in the population, and in particular the presence of Indigenous Peoples, as conflicts are recurrent. The inclusion of IPs in project preparations and activities is essential.
- The proposal has recognized local governance structures and shown that the project will draw lessons from these networks (p. 39). These are Beach Management Units (BMU), which were adopted as a vehicle to involve local communities to support protection of fresh and marine water resources. Apart from recognition and using lessons learned, the proposal has not indicated the status of these units (if they exist and functions within proposed areas of intervention) and if they will be used.

- In Tanzania, Water User's Associations have been used as a means to involve local communities in the management of water resources at both upstream and low stream areas. The proposal has not recognized the role of these associations. It should be indicated whether these associations have been established in the Tanzanian catchment areas and if they will be used, or whether the project will support their establishment.
- Under section 7 (consistency with national priorities), p. 78, the proposal shows how it will be nested with the national laws and policies. It is important that the proposal indicates how the project will accommodate new development of policies, plans and strategies based on the available knowledge. For example, all four countries will move from INDC to NDC and hence specific national commitments will be made by the Governments on adaptation and mitigation actions. To create more room for sustainability, the project should recognize and relate to both existing policies as well as those which have recently been developed. For example, Tanzania has a final draft of its NDC and freshwater management for climate adaptation is given a high priority.
- Inclusion of refugees is important considering the security situation in the proposed project areas. Refugee camps are covered under component 3 where the proposal has included adopting more sustainable natural resource harvesting and agricultural practices in the refugee camps of Mkugwa, Nduta, Kanembwa, Kalago and/or Mtendeli) adjacent to the north-west boundary of Muyowosi. The proposal shows that UNHRC will undertake Protection of refugee and displaced people by doing restoration and alternative livelihoods. The proposal is not clear about the way Local authorities in the proposed areas of interventions will be involved. This is important to ensure that restoration activities in the nearby refugee camps are linked with existing interventions by local authorities. Additionally, it can be mentioned that UNIDO has been involved in some work on fuel efficient cookstoves in refugee camps in Tanzania and may be a relevant partner to this effect.
- Tanzania has the largest Lake Tanganyika catchment area of 67% compared to other neighbouring countries of Burundi, DRC Congo and Zambia. The proposal should consider reflecting on the level of interventions and amount of resources with respect to the size of catchment covered and potential contribution to achieving sustainable fisheries co-management, biodiversity conservation and restoration of degraded landscapes in biodiversity areas of Lake Tanganyika.
- Water is a transboundary issue for cooperation or conflict. Lake Tanganyika is shared between four countries, and their cooperation on this valuable resource should be encouraged. However, the PIF is very weak in its mentioning of the water component. Even if the PIF informs that "The project will also address other priority threats to the lake, such as sedimentation and pollution", it is very hard to understand how this will be brought forward and implemented.
- It is difficult to see an added value of the "water component" of the current proposal, apart for specific fisheries-related activities. A regional program

addressing natural resources should elaborate much more thoroughly about the water resource and its potential for transboundary cooperation.

- Sustainable land management is relevant and much needed throughout Tanzania. Agriculture and charcoal are the main drivers of deforestation. It is therefore relevant to find ways to improve efficiency of land use, sustainable agriculture and agroforestry as well as promote soil conservation. Community based forest management has long traditions in Tanzania and it is positive that the proposal seems to indicate it will utilise this.
- Different farming systems have different potentials for human animal conflicts. How can the program promote crops and farming systems that reduces human-animal conflicts?
- Experience from many projects focusing on alternative livelihoods such as beekeeping and nursery development is that market analysis is lacking. Hence, if the livelihood activities aim at accessing markets with produce – a market analysis should be undertaken to ensure the realism and effectiveness of suggested activities.
- There are some challenges in the effectiveness of extension officers in agriculture in Tanzania. The extension officers are few and they have little resources. Farmer field schools have seemed to have some positive impact. It seems that a lot of the costs involved in extension services are covered by donor funded projects. The government of Tanzania, Ministry of Agriculture has in May 2020 launched an online service platform for farmers to access extension workers through their mobile phones. Several NGOs have also developed such systems in order to reach farmers more regularly and where farmers can quickly ask questions and get response.
- The proposal mentions the engagement of private sector (p. 50), there is however little information about private sector in the proposal, including in the problem statement. Output 3.2 Technical support on sustainable agriculture provided to subsistence and small-scale crop – there is no mentioning of access to markets and the role of private sector in enhancing livelihoods. We recommended to get some more information about the role of the private sector and what potential this engagement can have on economy and green growth.
- We are of the opinion that there is a lack of information in the problem statement on the fishing communities and their livelihood options, economic situation and trade patterns e.g. with neighbouring countries. The description of the role of and activities conducted by the ministry of livestock and fisheries, who is responsible for the management of fisheries, is lacking apart from being listed in as a stakeholder. The ministry has been engaged in campaigns to stop illegal fishing in Lake Tanganyika.
- TAWA is mentioned as the responsible manager of the MGR, however there is no mention of Tawa in the described project components. TAWA is in charge of Game Reserves and also Game controlled areas and corridors, often adjacent to National Parks. They are in serious lack of resources – due to parts of Selous Game reserve now developed for a hydroelectric power project (which was their

only real income in terms of photo tourism), but also due to the massive decline in hunting, exacerbated by Covid-19. There are indications that poaching has increased as a consequence of less tourism and less resources in agencies such as TAWA. Research has shown that poaching may be higher in MGR than in Serengeti. Some bilateral donors are considering increasing their support to TAWA due to Covid-19. What role will TAWA play in the GEF project? This should be further elaborated on.

- It is rather surprising (and problematic) that NGOs have not been consulted in the project identification phase. TNC is correctly identified as having relevant activities in the area. Both Jane Godall Institute and TNC are listed as key stakeholders in the project document. They would both likely have useful input to the project idea.
- On the list of stakeholders and their roles: For Tanzania it should be noted that all government agreements with donors are signed by the Ministry of Finance. MNRT is in addition responsible for the management of natural and cultural resources – also the ministry in charge of the Tanzania Forest Services Agency (TFS) who has the mandate to manage protected forest areas, relevant to the topic of charcoal production and deforestation.

✓ **Germany Comments:**

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

The proposal considers relevant problems and risks for the sustainable environmental development of the Lake Tanganyika Basin.

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

- Germany would like to point out that one critical issue that is not mentioned is migration. There is intra- and inter-country migration taking place at scale that needs to be considered in the project design and relevant activities need to be designed in order to mitigate the risk emanating from the migration. For example, in Tanzania there is a strong migration movement of agro-pastoralists (mainly Sukuma) from Lake Victoria southwards, coupled with migration movements or existing refugee camps in close proximity to the project area. Especially the agro-pastoralists have a large footprint which is critical to be considered.
- The project preparation consultations were so far only conducted on high-level. This is considered a critical gap in order to evaluate local needs and respective mechanisms to involve local communities into project activities. The project proposal should further emphasize how local communities will be involved in decision-making under consideration of local power structures and dynamics – especially regarding landownership and access.

- The project assumes that significant co-financing will be provided by national institutions in the partner countries (Ministries and implementing agencies). These agencies are supposed to provide in-kind contributions and investments to implement national strategies and action plans in line with the project objective. There is a high risk (not moderate as outlined in the risk assessment), that these contributions cannot be delivered. E.g. the Lake Tanganyika Basin Water Board is acutely underfunded and merely (i.e. given, that Zambia is close to default) manages to meet a minimal operative budget. It will be difficult to expect this office to contribute meaningfully to project activities if no additional finance is provided through different channels. Germany would therefore like to suggest that the project seeks additional sources of funding.
- Regarding the project's activities in Zambia, Germany would like the following points to be considered:
 - How is the organisational strength of the main partner Lake Tanganyika Authority LTA being evaluated?
 - It is suggested to pose a few questions regarding the fact that LTA has not yet uttered comments regarding the dam project Lufubu in Northern Zambia despite the fact that it is one of the few freshwater intakes for the lake (including water falls with World Heritage Status). The project is being seen critically by many NGOs and other players in Zambia.
 - The criteria for the selection of the 3 conservation areas are not clear enough.
 - In order to be effective, the fisheries component should have a clear regional focus („less is more“).

✓ **United Kingdom Comments:**

- **Zambia** - Worth noting that Zambia took over as chair of the regional group for Lake Tanganyika and this year there will be a new Executive Director appointed for the LTA. It may impact the project in its start-up.
- **DFID Central Africa** - Has there has been learning from the experience of efforts to develop community co-managed fisheries (beach Management Units)?

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- Enhanced management systems at the Itombwe Reserve will be necessary to ensure the sustainability of global environmental benefits beyond the life of the project.
- USAID/CARPE is happy to share experiences working in Itombwe, particularly challenges with long-term progress and security concerns/conflicts with the local community that may potentially limit project achievements.

48. Togo: Sustainable Management of Drylands in Northern Togo, UNDP (GEF Program Financing: \$5,448,173) (GEF ID: 10416)

✓ **Germany Comments:**

Germany highly welcomes the project proposal to support land degradation neutrality and sustainable land management, especially in the savannas of Togo.

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

- To ensure local ownership Germany suggests reviewing collaboration with existing initiatives, reviewing indicators based on updated data and experience with corresponding interventions, clear elaboration of interventions in the context of decentralization, involvement of municipalities (land management) and cooperation or sustainability aspects at municipal level.
- In detail:
- Provide details on synergies with existing approaches from other donors and partners, especially regarding data bases (remote sensing, etc.); planning tools, organizational development, regulatory framework, etc.) in component 1, involving esp. the national REDD+ efforts (readiness phase - FCPF/WB) and “Programme Restauration de paysages forestiers et bonne gouvernance dans le secteur forestier“ (GIZ/Forests4Future).
- Consider possible budget reduction for component 1 resulting from the above-mentioned synergies and collaboration, which will allow for a budget increase in component 2 to raise the ambition regarding implementation efforts and number of ha under sustainable land management.
- Consider an intensified coordination and cooperation with the Ministry of Agriculture in component 3 taking into account its orientation towards economic sustainable agriculture including forestry and agroforestry value chains from mid-2020 as well as existing related studies/analyses, partly by the same ministry.
- Stronger focus on training and implementation, especially in the decentralized structures of the MEDPPN and the newly established municipalities.

✓ **United States Comments**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

49. Tajikistan: Conservation and Sustainable Management of High-Value Arid Ecosystems in the Lower Amu Darya Basin, UNDP (GEF Program Financing: \$2,639,726) (GEF ID: 10439)

✓ **Canada Comments:**

- We are concerned that Indigenous peoples and local communities (IPLCs) and Women's groups were not consulted during the project identification phase; we do acknowledge that the project does identify that all relevant stakeholders will be fully consulted during the next phase of project development, which will be conducted in a fully participatory manner and includes several gender-related project interventions, but would appreciate future projects of similar intent consult prior to project design/selection.

✓ **Germany Comments:**

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

- Germany would like to highlight that Tajikistan has a Pasture Management Networking Platform and suggests including this network in the proposal. Germany further suggests including the following projects that are relevant in this context: the Regional Programme for Sustainable and Climate Sensitive Land Use for Economic Development in Central Asia; and the Regional Project Ecosystem-based Adaptation to Climate Change in High Mountainous Regions of Central Asia. Germany recommends strengthening local capacities by working with the forest research institute and the genetics research institute (re Barrier 3).
- Germany would like to emphasize the importance of increased interaction between NBBC and MoA. The project should foster inter-sectoral/ministerial dialogue and ensure that biodiversity is not limited to PA. Plans to mainstream biodiversity should align with the 2030 biodiversity framework and the new NBSAP - stressing links to agrobiodiversity and addressing biodiversity as a cross-cutting topic. Any information on biodiversity conservation should further be linked to IPBES' capacity building rolling plan and coordinated with the respective focal point in country (CEP).
- Germany would like to emphasize that most PA do not have any management plans. Such plans for the management and protection of biodiversity (or nation-wide standards) would have to be developed. The strong focus on PAs raise additional concerns: How is the interconnectedness with the adjacent landscape addressed? Which areas around the PA are targeted that are under administration of the MoA?

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

50. Belarus: Conservation of Wetland Biodiversity and Sustainable Management of Freshwater Ecosystems in the Western Dvina/Daugava Transboundary River Basin, UNDP (GEF Program Financing: \$3,826,941) (GEF ID: 10462)

✓ **Canada Comments:**

- Canada supports the Secretariat's recommendation that was made during the initial review of this project, which notes there are gaps in the proposal that should be addressed, and that the theory of change should be elaborated on to better articulate the objectives and outcomes of the project, and that gender issues related to the project objectives should be addressed as well.

✓ **Germany's Comments:**

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

Germany approves this proposal that contributes to the conservation and restoration of freshwater ecosystems in Belarus with a focus on the protection of biodiversity and supports the transboundary management approach of the proposal. Nevertheless, it asks that the following comments be taken into account.

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

- Germany would appreciate a more detailed illustration of the way the project aims to make a significant contribution to climate adaptation efforts. Although Germany welcomes the inclusion of a Rio Marker on climate change adaptation (Score 1) in the current version, the proposal would benefit from stating the link between the project's intended measures and climate change adaptation more explicitly.
- Germany kindly suggests a stronger emphasis on the climate regulating function of wetlands as well as the significance of these functions on a global scale (applicable to peatlands in particular).
- While Germany appreciates the identification of pollution by agricultural runoffs as a main problem for wetlands' integrity (component II), it kindly recommends formulating a more tangible and ambitious respective output (2.2.3). Furthermore, Germany stresses the importance of reflecting on sustainable land-use practices and development in wetlands in a holistic manner, going beyond fishing, hunting, ecotourism etc.

- Germany welcomes the ambitious indicator 1.1. on reaching 15,000 beneficiaries. Nevertheless, it would welcome a detailed description of mechanisms of public participation (e.g. for local communities) during the preparation and implementation phases of river basin and/or Ramsar site management plans, especially focussing on the way consultation and complaint mechanisms are integrated in these management concepts.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- The gender elements and tracking of this project seem relatively under-developed.

51. Lao PDR: Lao PDR Landscapes and Livelihoods Project, World Bank (GEF Program Financing: \$7,366,976) (GEF ID: 10449)

✓ **Germany Comments:**

Germany requests that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement.

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

- The missing section 1a “Project description” (see Part II, p. 20) needs to be filled in.
- Germany also recommends ensuring coordination with the following projects of German Development Cooperation present in Laos:
 - Bilateral: LMDP- Land Management and Decentralized Planning and)
 - Global: ELTeS- Enhanced Land Tenure Security
 - Regional: MRLG- Mekong Region Land Governance

52. Peru: Sustainable management and restoration of the Dry Forest of the Northern Coast of Peru, FAO/ IUCN (GEF Program Financing: \$ 7,666,491) (GEF ID: 10541)

✓ **Canada Comments:**

- The project proposal should clarify how linked, or not, the project is to the United Nations Convention to Combat Desertification (UNCCD) activity. The proposal mentions that Peru’s Environment Ministry is the country’s national focal point to the UNCCD, and that it recognizes the concept of Land Degradation Neutrality (LDN) as part of its environmental approach and promotes the mainstreaming of sustainable land management (SLM) in planning

and public policies; so, it should be made clear that there will likely be no overlap or duplication of activity with UNCCD activity.

✓ **Germany Comments:**

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

Germany welcomes the well thought out proposal and particularly the significant government support in a forest type that so far has not been the focus of attention.

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

- The proposal indicates that the project will support protected areas as well as other effective area-based conservation measures (OECMs). However, ACR (Regional Conservation Areas) and ACP (Private Conservation Areas), are erroneously considered within the category of OMEC. In Peru, ACR and ACP are considered Natural Protected Areas (ANP), not OMEG. It is recommended to correct the definition of OMEG, so they can be included in the project proposal. In that case, it could also be possible to generate synergies with GIZ's Regional Project Local Conservation Areas, which cooperates with the Regional Government of Piura (one of the target regions) on OMEGs.

53. Tunisia: Oasis Landscape Sustainable Management project, World Bank (GEF Program Financing: \$2,739,726) (GEF ID: 10538)

✓ **Canada Comments:**

- We appreciate that this project distinctly recognizes the important role of women in conservation and prioritizes female participation in project design and implementation as well as access to project benefits. This appears to be a great example of mainstreaming gender considerations into the implementation of the Convention on Biological Diversity (CBD).

✓ **Germany Comments:**

Germany requests that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement.

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

- The missing section 1a "Project description" (see Part II, p. 14) needs to be filled in.

54. Regional - (Brazil, Colombia, Ecuador, Peru): Integrated watershed management of the Putumayo-Içá river basin, World Bank (GEF Program Financing: \$12,844,037) (GEF ID: 10531)

✓ **Canada Comments:**

- We find that outcomes for addressing overfishing, deforestation, and increasing regional governance capacity through improved monitoring and synthesized information, are unclear and should be quantified.

✓ **Germany Comments:**

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

Germany approves this proposal, which contributes to sustainable water resource management in the region neighbouring the Putumayo-Içá watershed, and especially welcomes its focus on equitable water access by vulnerable groups.

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

- Germany would prefer if the proposal could indicate the ways in which the Colombian Ministry of Energy and Mining will be associated with the project as a main stakeholder of the country's mining sector.
- Germany suggests amending the proposal to include further elaboration on how mining companies in the entire project area will be involved during project implementation, as they are the key actors for successfully implementing component 2 (governance of integrated water management) and component 3 (reducing mercury in the gold sector).
- Germany stresses the importance of demonstrating the extent to which the proposal would overlap with the Colombian programme "Visión Amazonía", which focuses on reducing deforestation (in the Putumayo region, among others), as this is a key factor for successful integrated water resources management.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- The activities laid out in the PIF seem in a relatively nascent stage of development, and overall it is unclear how the funding will be spent. What are the on-the-ground activities to be carried out? The project mentions multiple times an intention to address illegal gold mining, fish farming, and best practices in oil, gas, and infrastructure, but without project detail, it is difficult to determine if the activities proposed align with these outcomes.

- The PIF states that “indigenous peoples or communities” have not been consulted with during project development, but that they will be as they further develop the project. We find the lack of inclusion of indigenous peoples and communities from the design phase of a project troubling and would like greater clarity moving forward on their consultation.

55. Papua New Guinea: Integrated land management, restoration of degraded landscapes and natural capital assessment in the mountains of Papua New Guinea, UNEP (GEF Program Financing: \$3,512,100) (GEF ID: 10580)

✓ **Germany Comments:**

Germany welcomes that the proposal presents very relevant and important interventions, given that improved and sustainable land use in PNG is critical. However, given the land tenure complexities and conflicting land use interests, developing a land use plan and a SFM and SLM approach that is accepted and successfully implemented across all sectors and agencies will be challenging. The proposed project is commended for taking on this task.

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

- Climate change and variability and its impact on land use and agriculture is mentioned, however, there is still potential to strengthen the climate change element e.g. by including SLM and SFM technologies. Germany suggests better reflecting on how the project will consider climate change impacts in land use planning, SLM and SFM approaches and in Natural Capital Valuations (NCV), Strategic Environmental Assessments (SEA) and the Environmental Impact Assessments (EIA). Germany would also welcome explicit mention of how the project will contribute to building climate resilience.
- A cost-benefit analysis component linked to land use planning that identifies economically feasible sites that have less impact on natural assets would be valuable. Germany suggests taking the Natural Capital Valuation component a step further to incorporate “cost-benefit analysis” – which takes information from the NCV to guide land use planning.
- The current narrative on community governance is largely on commercial development. Governance to support SLM and SFM implementation, including addressing marginalised farmers/land users, land tenure arrangements and land security should be strengthened. Germany suggests addressing consensus building among landowners and land users, including women, and defining clear landowning boundaries, addressing governance issues at district and village level and giving information on how the project addresses the needs of marginalised farmers who are currently contributing to land degradation.
- The capacity building of trainers / extension staff / government staff on the “latest SLM and SFM practices and approaches” is not clearly articulated.

Given that there is a need for capacity building of officers in this area, Germany would suggest to explicitly mention the capacity building of supporting agencies, including provincial/district extension officers on appropriate and innovative SLM and SFM approaches and on participatory land use planning tools.

- Regarding p. 25, para 2: The “conflicting land use interests” is not coming out very clearly. There needs to be stronger narrative on the various land use interest among the different sectors, including interests of the resource owners and users.
- Regarding section 4: Climate change adaptation information is weak. The proposed project intends to increase economic production through SLM so the baseline scenario for current economic activity needs to be reflected here. Germany suggests drawing information presented in pp. 21 and 24 and including the National Adaptation Plan to cover the adaptation elements.
- Regarding component 1 in section 5: The role of resource owners / farmers is missing. Germany suggests including suitable local community / resource owners’ representatives for training/engagement in NCA, SEA, EIA. Also, regarding page 29, para 3, the stakeholder engagement and consultation process on policies, legislations, plans, etc, appears to be focussing on the national level only and implies a top-down approach. Germany would welcome explicitly including a stakeholder engagement process that includes local communities and farmers, with regards to consultation process on national policies, plans and relevant regulatory frameworks.
- Regarding section 7: Climate resilience arising from SLM and SFM as a Project contribution can be mentioned. If the project does not go ahead then both human and ecosystem vulnerability to climate change increases and land degradation is exacerbated. Germany suggests including climate resilience components in terms of the project’s contribution.
- Sustainability: Can be strengthened especially from the context of ownership and implementation of participatory land use plans. The engagement of all supporting agencies and landowners in the development, implementation and review of land use plans should be the basis for sustainability.
- Gender: There is mention of women being very active in “in selling produce and merchandised goods” but there does not appear to be any plans to advance this aside from “training of young women entrepreneurs in computer skills, business management and basic accounting”. Germany suggests elaborating more on how women can be better engaged in the decision-making process, how the project can support rural women to successfully run SMEs and how women’s (independent) access to land can be addressed.
- Creating ownership: This is not coming out very strongly, particularly for ownership among local communities, resource owners and land users. A participatory land use plan is mentioned but the participatory process and the bottom-up consultation approach is not well articulated.

- Synergies: GIZ Project in PNG related to this sector is ending in 2020 (CCCPIR – focus on land use planning). Can have linkages to the Regional Pacific NDC Hub support via CCDA and the Regional REDD+ Project via PNGFA.

56. Regional – (Albania, Algeria, Lebanon, Libya, Montenegro, Morocco, Tunisia, Turkey): Fisheries and Ecosystem Based Management for the Blue Economy of the Mediterranean - (FishEBM MED), FAO/ UNEP (GEF Program Financing: \$7,273,973) (GEF ID: 10560)

✓ **Germany Comments:**

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

Germany welcomes the proposal which aims to mainstream ecosystem-based management tools to reverse the over-exploitation of marine resources in the Mediterranean area, a long-standing problem in this area. Germany specifically welcomes the focus on small-scale fisheries – the majority of fisheries in the region – and the aims to increase benefits and revenues for those by value chain interventions to produce positive socio-economic impacts.

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

- General: While studies have shown that adequate management of marine resources can lead to better status of fish stocks, it is not yet clear from the proposal how fishing pressure will eventually be reduced. Overfishing is rightfully identified as the number one barrier preventing the management of resilient and sustainable fisheries. Current numbers from EU-contribution to the UN Fish Stocks Agreement estimate a fishing pressure FMSY of 224-269%. Reducing current fishing capacities seems to be an issue that needs urgent and prioritized addressing.
- Specifically: Output 1.4: the number of fisheries participating in certification schemes seems to be a double-edged indicator as certification schemes have proven to especially disadvantage small-scale fisheries; suggestion is to simply keep the indicator “sustainable marketing initiatives” (e.g. creating and marketing direct linkages between sustainably operating small-scale fishers and restaurant/ hotels in tourist regions, thus rewarding good practices).

✓ **United Kingdom Comments:**

- **Albania** – It is important that the project in Albania is “SOC sensitive” (Serious and Organised Crime).
- It is important the project is able to create sustainable livelihoods, while conserving the fisheries stock, environment.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

57. Philippines: Securing Long-Term Sustainability of Multi-functional Landscapes in Critical River Basins of the Philippines, UNDP (GEF Program Financing: \$3,273,990) (GEF ID: 10532)

✓ **France Comments:**

- Favorable opinion with a recommendation: include a component covering enhanced water usage efficiency and agroecology in the capacity-building program: “*training focused on Sustainable Land Management (SLM) and biodiversity-friendly agricultural Practices (e.g. use and preservation of indigenous/traditional crop varieties.*”

✓ **Germany Comments:**

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

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

- Germany recommends addressing the implications of the ongoing Covid-19 pandemic on the implementation methodology in the full project proposal. With regards to scaling up results of pilot cases towards national policies, more details on how to achieve validity in all three main regions of the Philippines (Luzon, Visayas, Mindanao) would be welcomed.
- Germany would like to highlight the important issue of mining activities in Mindanao and many other river basins. Further, Germany would appreciate seeing the critical role of land ownership and land tenure addressed, given the context of past violent conflicts, controversial laws and limited access to the judicial system in Mindanao.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

58. Regional – (Colombia, Jamaica, Panama): Reduce marine plastics and plastic pollution in Latin American and Caribbean cities through a circular economy approach, UNEP (GEF Program Financing: \$7,000,000) (GEF ID: 10547)

✓ **Canada Comments:**

- We would appreciate further details on how this project will also look at reducing plastic use and will actively seek not to produce a system that requires continued creation of plastics to support the new plastic circular economy.

✓ **Norway/Denmark Comments:**

General comments:

- We very much welcome the “source-to-sea” approach, and the emphasis on coastal cities. The design of the project seems well aligned with the situation analysis in the three target countries.
- The project consists of four interlinked and highly relevant components (with related outcomes, outputs and indicators), while the implementation approach could be explained in more detail.
- The active engagement and “buy-in” of private sector stakeholders across the value chain seems essential to the success of the project. It is encouraging that a relatively high amount of co-financing from private companies is envisaged (although yet to be confirmed). Ensuring these in-kind contributions, as well as developing partnerships which genuinely interest private sector actors, will be of essence.

Detailed comments:

- The PIF document notes that one of the Outcome Indicators for the whole project is “Reduction/ avoidance of plastics entering the environment, including the oceans», with a target of 5, 000 tonnes. How will this indicator be measured?
- The PIF document mentions under Sustainability that the project “will actively assist cities/municipal authorities to develop sustainable partnerships with the private sector involved in plastic waste”. How will this be done more concretely? It seems key to the project longevity that such partnerships are given priority, and that there are market incentives for private sector to participate.
- Under the section “Potential for scaling up”, it is mentioned “that a mechanism will exist, through a global framework, to facilitate the up-scaling of the results in this project to other cities within the LAC region and globally”. Could you expand on this mechanism?
- We note that the risk framework is quite limited. For example, the current framework does not include internal risks that could also hamper the project

developments (e.g. HR, administrative or organizational issues). Moreover, the risk framework would also benefit from an update considering the global Covid-19 pandemic (for instance the risk of private companies not having the same ability to contribute financially after the ongoing lockdowns).

✓ **Germany Comments:**

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

Germany welcomes this proposal which addresses a mayor contamination issue in the region through a circular economy approach, including public and private actors as the main drivers of change.

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

- Component 1:
 - City based policy frameworks and action plans should be designed from their outset with a focus on the social and economic inclusion of waste pickers. We therefore suggest renaming them inclusive city-based policy frameworks for the circular economy. (This is connected with Output 1.1.3.3)
 - The full proposal should clarify in how far certain policies (e.g. regarding product bans, EPR) can indeed be adopted on city level. Alternatively, stronger collaboration with national government entities or a focus on the local testing of approaches (on a voluntary basis or based on adopted national policies) should be envisaged. If the link to the level of individual cities shall be maintained, it might be preferential to focus e.g. on dialogues with local retailers (and their suppliers) to develop waste prevention measures and to reduce the scope of outcome
 - Good decisions on waste flows and circularity from a public and private perspective require good data and information on the municipal level. We suggest including a data and information management system on the circular economy on a municipal level in alignment with national strategies.
 - Extended producer responsibility schemes in Colombia on the municipal level need to be aligned with national regulation (Output 1.1.4 2) Good mechanisms of communications between the municipal and national level in all participating countries need to be established and maintained.
- Component 3:
 - Besides the learning initiatives among the network of cities, there should also be a mechanism which allows to share the experiences and lessons learned of each city within its own national context with other cities and actors on the national level. (Connected with Output 4.1.2).
- We expect that the influence of city governments on outcome 2 is relatively limited, therefore one might expect a much higher co-financing contribution of

private sector here, but a lower co-financing contribution to outcome 1. In addition, Germany suggests a revision of the outcome indicators: the last two indicators under outcome 1 rather fit to outcome 2, while the last indicator under outcome 2 better fits in outcome 1.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- We do not support activities within the proposed Output 1.1.2, that seek to introduce new bans and/or restriction on plastics at the municipal level. We do support Output 1.1.2 activities focused on examining the potential impacts of alternative product and recommend that such life-cycle analyses be conducted before any further policy action is taken at the municipal level.
- We are very supportive of the solid-waste management activities proposed under Output 1.1.3 A
- We would like to see a clearer distinction between marine plastics and plastic pollution in the next iteration of the proposal.
- We can support extended-producer-responsibility schemes only if they remain voluntary.

59. Sri Lanka: Partnerships and Innovative Financing to Mainstream Biodiversity and Sustainable Land Management in the Wet and Intermediate Climatic Zones, UNDP (GEF Program Financing: \$4,005,251) (GEF ID: 10537)

✓ **Germany Comments:**

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

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

- While the project is focused on biodiversity conservation and enhancement of mainly forested areas within and adjoining estates and smallholder areas, it omits entirely the issue of the vast wood biomass deficit for a sustainable energy supply in the plantation sector. In the past, experience has shown that the fuelwood consumption of the plantation workers could not be covered by the estate resources. Instead, the necessary fuelwood was collected from the adjacent forest areas. Germany would therefore like to recommend that an investigation for the needs and access of fuelwood for the plantation workers is be considered in the project feasibility phase. The financial contribution of the plantations should consider measures to reduce the firewood gap.

- In addition, in order to implement measures for erosion protection, Germany would like to recommend that the considers the use of the Sloping Agriculture Land Technology (SALT) instrument, which is still in use in the region.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

60. Viet Nam: Sustainable Forest and Forest Land Management in Viet Nam’s Ba River Basin Landscape, UNDP (GEF Program Financing: \$2,183,105) (GEF ID: 10539)

✓ **France Comments:**

- *Sustainable Forest and Forest Land Management in Vietnam’s Ba River Basin Landscape:* Is it possible to have more information on the reference to “restoration of habitat connectivity” and how much of the forestry aspect is taken into account in “sustainable forest management,” especially in connection with the legality aspects?

✓ **Canada Comments:**

- Vietnam’s work under the United Nations Convention to Combat Desertification (UNCCD) is not mentioned in the proposal – we recommend that the proposal clarifies the link, or lack thereof, between project activities and UNCCD activity.

✓ **Norway/Denmark Comments:**

- The project is highly relevant for Vietnam. It aligns with Vietnamese priorities in forest management and addresses an important gap in Vietnam, i.e. forest biodiversity conservation.
- The project will be incremental to ongoing SFM projects and processes in the project area. It will add essential elements, including a landscape-level understanding of threats and ecological processes, and enhanced and gender-mainstreamed participation of local, forest-dependent communities.
- The PDF should further clarity how the project maps out and addresses key drivers for forest loss and biodiversity degradation in the project area, e.g. the Ba river basin. As a matter of fact, key drivers of forest loss are infrastructure development, illegal logging and forest fire.
- While the project undertakes a river basin approach, it is not clear how this works out across related provinces (Gia La, Phu Yen...), sectors (forestry, land administration, socio-economic development planning...).
- Regional and cross-border cooperation in hydropower development, forest protection, illegal logging, wildlife trade, etc. should be addressed.

- There should be more substance on whether and how forest environmental services (PFES) and REDD+ payment schemes are applicable in the project.
- The overall risk categorization for the project is high. We agree with the GEF Secretariat stating that the project will notably have to assess its potential impacts on access and rights of IPLCs. It is important to achieve a parallel focus on biodiversity protection and IPLC's rights in project component 2. Only one of the seven outcome targets concerns IPLC, namely diversified livelihood options in two communities. Elsewhere it is said that "approximately 3,000 members of forest-dependent communities, as well as staff of various forest management authorities and government agencies, will directly benefit from the project's capacity development and livelihoods support". It is not given information about population figures in the project area, but it seems reasonable to assume that only a tiny part is targeted. We would welcome more information about the selection of beneficiaries and about measures to be put in place to ensure that the project will not lead to deteriorated livelihoods and violation of rights for the other communities. We further encourage reflection on how the other communities could be supported in creating livelihood opportunities.
- One of the risks identified is challenges in engaging local resource users in ethnic minority communities. During the project preparation phase it is important that IP communities be consulted more broadly, not only village leaders. The final project submission should give an overview of the lessons and good practices it will draw on, as well as resource actors.
- There is little information about livelihood options and NTFP and forest income generation models. In addition to more concrete information in the final project submission, we invite the project to provide an overview of lessons, good practices and resource actors to be drawn upon. We would also welcome information about other financial mechanisms than PFES, and more concrete information about potential private sector partnerships.
- There appears to be no assessment of unintended effects by the project on anti-corruption. The likelihood and severity of this issue should be assessed.

✓ **Germany Comments:**

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

Germany welcomes the well-structured proposal and particularly the link to synergetic initiatives to strengthen the implementation.

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

- We suggest taking another look at lessons learnt and best practices for many of the intended activities that are available globally and for SE-Asia in particular. Constraining factors for the suggested measures are often their institutional anchorage and sustainable financing mechanisms.

- Under Component 1 and 2 special legal entry points and long-term financing concepts for the intended innovations should be identified at an early stage (e.g. for multi-stakeholder platforms, use of spatially explicit biodiversity and ecosystem services considerations for land use planning, participatory biodiversity and forest resource monitoring and inventory) and thus be part of the project concept.

✓ **United States Comments:**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.

61. Indonesia: "Plastik Sulit": Accelerating Circular Economy for Difficult Plastics in Indonesia, ADB (GEF Program Financing: \$7,123,288) (GEF ID: 10546)

✓ **Norway/Denmark Comments:**

General comments:

- The project aims to build on analysis done by the Global Plastic Action Partnership (GPAP) and its first National Plastic Action Partnership (NPAP) for Indonesia. It will bring forward recommendations for implementation in close collaboration and coordination with NPAP and the Indonesian government's National Plan of Action on Marine Debris (NPOA). We welcome the project's focus to follow up on this and its particular focus on reducing or substituting plastic usage and redesigning plastic products and packaging, over recycling and waste management, in order to catalyse the transition to a circular economy.
- There is a plethora of projects to combat marine litter going on in Indonesia. It is important that coordination will be ensured. (E.g. other projects relevant for coordination funded by Norway:
 - UNDP's Support Facility Project for Marine Plastic Litter Reduction Acceleration Secretariat (with a specific focus on assisting the government with coordination)
 - An innovation challenge called "Ending Plastic Pollution Innovation Challenge" which will most likely take place in Indonesia in 2021. (Could be relevant for the Circular Business Hub).
 - NIVA's (Norwegian Institute for Water Research) "ASEAN-Norwegian Capacity Building Project for Reducing Plastic Pollution". (Could be relevant for the Circular Business Hub).
 - Greeneration Foundations's "Creating Strong Ecosystem to Implement Circular Economy in Indonesia". (Could be relevant for the Circular Business Hub).
 - EcoNusa Foundation's "Building Movement for Indonesia Marine Debris". (Focus on awareness raising)

- Avfall Norge’s “Clean Oceans through Clean Communities”. (Could be relevant for the Circular Business Hub).
- It is promising that the project potentially will align with Project STOP (also receiving funding from Norway).
- It would be beneficial if the project was clearer on what its main objective will be. Currently, the project structure and its three outcomes are first described before the project’s focus on problematic plastics is presented.
- We note the discussion regarding the inclusion of ghost fishing gear as commercially problematic plastics. We understand why it has been included due to interest from the Indonesian government but would also like to raise concern that the scope of the project could get too wide focusing both on sea- and land-based plastic waste.
- As the project has quite a top-down approach, and a mix of activities taking place at the national and sub-national levels, it will be paramount that it secures ownership and buy-in from partners from different sectors and particularly vulnerable groups (e.g. in the informal sector).

Detailed comments:

- It is stated that “the proposed GEF project will focus on the challenges of commercially problematic plastics”. If this is a focus, this should be better reflected in the results framework. Currently, this is not mentioned in the outcomes, only in outputs 2.2 and 2.3.
- With regards to the Theory of change figure, CO₂-emissions from production and at end-of-life could be listed under “problems”.
- We note that the first bullet point linked to outcome 1 in Figure 4 “Build on data/metrics in NPAP Action Roadmap” is not included in the results framework. Is there a reason for this?
- Under “Environment and social safeguards” it is mentioned that the project will not decrease employment. Is it possible to be more ambitious and aim to create more jobs? E.g. in the informal sector?
- The project states the importance of working with the private sector. It would however be useful to clarify if the project will accommodate different strategies for big multinational companies or small and medium sized enterprises.
- Risk factors that could be added:
 - It is mentioned that Indonesia is lagging behind when it comes to innovation. Could this limit the success of The Circular Business Hub? How will it be ensured that enough sound solutions can take use of the Knowledge Hub and the Test Facility?
 - The project can negatively affect livelihoods for poor and vulnerable groups, e.g. the informal sector.
 - How will the COVID-19 situation affect the project?

- What if private sector partners are hesitant about taking part, as the project will disrupt their business model? (E.g. they have expressed concerns regarding EPR-mechanism)
- Analysis of internal capacity within ADB.
- The development of an EPR tax level assessment tool and EPR market stimulation price calculator sounds interesting. Will these also be possible to use in other geographical locations?
- Will the Circular Business Hub, most likely to take place in the city of Cirebon focus on local stakeholders or invite nation-wide participants?
- The medium-term vision for a Circular Business Hub is mentioned. Is there a long-term vision to make it sustainable after project end as well?

✓ **Germany's Comments:**

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

Germany welcomes this proposal, which addresses reduction of plastic pollution and supporting Indonesia's transition to a circular plastics economy through a multi-stakeholder value chain approach demonstrated at city level.

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

- Data obtained through the Output 1.1 on Market analysis of plastic value chains should be used for further policy developments in the country. Germany recommends ensuring that the results and data obtained are linked and put in the Ministry's database/system.
- The actual engagement and long-term commitment of the proposed city (Cirebon/North Java) remains unclear, as well as selection of further two cities as pilot cities. Germany suggests providing more clear-cut and robust information on municipal engagement commitments. Also, no information is provided on the criteria of selection, please include these in the final proposal.
- While the concept of establishing a Circular Business Hub is interesting and ambitious, the medium- to long-term financial sustainability of such a hub beyond the project duration remains unclear. Germany suggests including references to a medium-to long-term (financial) strategy how to operationalize such a hub. In addition, the requested financing for project component 2 (3,800,000 USD) seems slightly exaggerated and needs more detailed specifications regarding planned allocations in light of the proposed activities.

✓ **United States Comments**

- The United States requests that this project is circulated to the Council for a four-week review period prior to CEO endorsement.
- We find it of concern that the proposed project would support the development and drafting of new policies and regulations that potentially include single-use plastic bans, particularly in the absence of robust analysis of the lifecycle impacts of plastic alternatives (Output 1.2). Similarly, we find it of concern that priority would be given to measures that reduce or substitute plastic usage, in the absence of such an analysis.
- We can support extended-producer-responsibility schemes only if they remain voluntary.
- This proposed project appears to align with some, but not all of the goals of the NPAP Action Roadmap, and broadly excludes improved solid waste management. Potential future ABD work outlined on page 20 notwithstanding, the limited solid waste management work outlined in Annex D causes concern that this project misses an important opportunity to contribute to improved environmentally sound waste management systems, which would enable the project to achieve more significant and sustainable results. Recognizing that the GEF's comparative advantage may lay outside the implementation of solid waste management system, we recommend the project consider the development of a solid waste management strategy, as an additional component of the governance mechanisms.

62. Guinea-Bissau: Strengthening ecological connectivity in the Dulombi-Boé Tchetché complex (DTB), IUCN (GEF Program Financing: \$4,773,101) (GEF ID: 10556)

✓ **United States Comments:**

- We appreciate the STAP's review of this project, and share the concerns laid out in the STAP Overall Assessment and Rating as well as their concerns with the general specificity of the linkages between project components and outcomes.
- We also found it of concern that despite contributing to the enabling environment for this project, work done by UNCCD's LDN Target Setting Programme (TSP), including the National Working Group that validated the target on 29 August 2017 is not mentioned in the PIF. Generally, the lack of activities related to implementing recommendations from the Land Degradation Neutrality (LDN) target setting exercise since the target adoption raise concerns about potential barriers to success that will need to be overcome in the proposed project. To this end, we would like to see additional information in the next proposal stage, on how the relevant ministries will work together moving forward, and what steps may be taken to implement the target already adopted.

✓ **Germany Comments:**

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

Ecological connectivity of protected and non-protected areas is a very important feature of landscape approaches towards enhanced biodiversity. The focus of the project lies on establishing ecological connectivity between three protected areas and beyond which is highly relevant and has potential national and regional impact.

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

- The project description would benefit from explaining more clearly which specific geographic areas and habitats (corridors) are target of the project. Are they identical with the Tchetché National Corridor, the Cuntabane-Quebo National Corridor and the Salifo National Corridor which were established under a former GEF-UNDP project?
- Germany would like to suggest that a special focus could be on the active inclusion of the productive sector (agriculture, beekeeping, livestock), fostering sustainable practices in the corridor areas which are not detrimental to biodiversity and generate income likewise. Approaches such as agroforestry could be of great benefit.
- Germany would further like to propose that the project could include a brief description of the means by which improved policies and regulations as well as inter-institutional cooperation will be achieved.

63. Mexico: Mainstreaming Biodiversity in Rural Landscapes of Mexico, CI (GEF Program Financing: \$8,974,312) (GEF ID: 10574)

✓ **Norway/Denmark Comments:**

- Agriculture is the third biggest and most rapidly growing industry in Mexico. A surging population, increased exports to The United States and increasing profits for a variety of produce has placed enormous stress on previously untouched areas of Mexican land. Agricultural production and a strengthening of the poorer rural areas is a key focus of the current Andrés López Obrador government which already has implemented a big funding program called “Sembrando Vida”. Biodiversity and environmental production are however not priorities in the current government and it is therefore of great value that this project is co-funded with SEMNARNAT. In 2019 Mexico was plagued by a range of forest fires that in large part were the result of illegal farming and harmful land management in the agricultural sector.
- There are several important goals to this project and it would undoubtedly contribute to strengthening one of the poorest parts of the Mexican society. Norway was previously involved in the REDD+ project in Mexico, but since

2017 there have been no environmental or rural cooperation projects between Norway and Mexico.

✓ **United Kingdom Comments:**

- An initial agency response to the below comments from the United Kingdom was provided and can be found in the list of documents specific to the project in the GEF Portal.
 1. It would be good to understand whether there is buy-in from the federal government to work across these broader geographic regions and who the main partners are in the Mexican system (especially given the experience with CONAFOR and the FCPF and ISFL). Is the Environment Ministry SEMARNAT, the Agriculture Ministry SADER or the Agenda 2030 team in the President's Office involved?
 2. On the blended finance, it would be good to understand what this would involve, and whether there is government buy-in for this mechanism?
 3. We encourage GEF to work in the same Mexican states that the ISFL programme is planning to work (i.e. 4 states in the North: Chihuahua, Coahuila, Durango, and Nuevo Leon). The only state this GEF project would have in common with ISFL geographies is Nuevo Leon.
 5. We encourage liaison between GEF agency (FAO) and the World Bank as a trustee of ISFL, and the National Forest Commission CONAFOR as implementing agency of the GoM to maximise synergies.

MULTI-TRUST FUND

64. Yemen: Resilient and sustainable livelihoods for rural Yemen, FAO (GEF Program Financing: \$7,051,742) (GEF ID: 10562)**

✓ **Norway/Denmark Comments:**

General comments:

- This project seems to be addressing very relevant issues related to biodiversity and sustainable land management in Yemen. On an overall level, this is a well-planned project.
- The theory of change is however not clear and could benefit from a more thorough description of the linkage between the planned activities and the expected results.
- The food security component is not sufficiently clear. It seems that food security is a secondary concern, and that the food security related outputs are in fact just an additional benefit of switching to a more environmentally friendly crop and

production system (khat vs coffee). Given the complexity of the situation, it would make sense to apply a sustainable food systems approach, but this is not mentioned in the proposal. However, it is positive that spatial planning is planned to be cross-sectoral.

- The description of the transition from khat production to coffee production, intercropped with other crops, is a bit limited. It is also not clear how this will lead to improved food security. It is mentioned that 40% of all Yemeni children suffer from malnutrition, but it is not explained how the activities will actually lead to improved nutrition. Increased food production does not automatically lead to improved nutrition.
- The CCA-potential of the project is not sufficiently explained. Investments aimed at increasing biodiversity and ensuring sustainable land management can also have adaptation benefits. Ecosystem-based adaptation should be considered.
- The project sustainability lacks a description of how the activities in the Water User Associations will be sustained.

Detailed comments:

- It is mentioned that climate information will be tailored to stakeholders needs. How will the climate information be obtained? Is there a well-functioning NMHS in Yemen? How will users be included in the climate information production? How to ensure co-production?
- Using Water User Associations as entry points seems promising. Adding additional resources and possibilities to these groups will probably require strict control measures. Which measures will be taken to ensure transparency and avoid corruption in the WUAs and fisher associations?
- How realistic is the ambition of 50% of the beneficiaries of the project being female? How will female participation in the WUAs be ensured? Even though 30% of the board members must be female, this does not guarantee for female participation in the association.
- The project does not seem to focus on women's IGAs – could this be included?
- How will vulnerable groups be included in the project?
- Drought resistant, early-maturing and improved seed varieties to ensure good productivity will be promoted. How is the existing seed security in the area? Has a seed systems analysis verified that there is a need for bringing in new seeds? Will the seed supply be sustainable?
- The issue of water efficiency for agricultural production is not sufficiently addressed. Stone bunds are mentioned, but other water harvesting and irrigation techniques could also be relevant.
- How will the project balance the promotion of cash crops with subsistence crops?

- Agroforestry is mentioned, but not described. While agroforestry can be seen as a good way of enhancing smallholder’s food supply, income and health, the adoption and scaling up of these systems among food insecure communities can be difficult. The proposal does not provide a description of how agroforestry will be introduced in the communities.
- In terms of risks, the long civil war in Yemen should be better taken into consideration and its impacts mitigated.

✓ **Germany Comments:**

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

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

- Provide a more precise description of the fragile and dynamic situation in the country as basis for a risk assessment regarding political fragmentation and the role and status of Government in Yemen within the proposal.
- Further explain how local ownership will be ensured, taking into account the de facto Huthi “government” in the northern governorates as well as recently elected local councils in Socotra and Al Mahra as part of a Do No Harm approach in a highly conflictive context.
- Consider coordination with ongoing thematically relevant GIZ projects: Strengthening Resilience and Local Participation (transitional aid); Institutional Development of the Water Sector III ‘IDWS’ - Addressing Basic Needs. Note that the mentioned GIZ projects Conservation and Sustainable Use of Biodiversity (approach taken up by FAO) and Food and Nutrition Security, Enhanced Resilience have expired or are about to expire but can provide relevant lessons learnt.

SMALL GRANTS PROGRAMME

65. Mexico: Seventh Operational Phase of the GEF Small Grants Programme in Mexico, UNDP (GEF Program Financing: \$4,481,210) (GEF ID: 10504)

✓ **Germany Comments:**

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

Germany welcomes the proposal due to its focus on strengthening local governance and social organization in economically vulnerable communities, which is even more relevant for enhancing resilience in view of the current CoVid-19 pandemic.

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

- Furthermore, Germany suggests taking into account possible coordination with the following projects:
 - Proyecto Mixteca Sustentable AC, which operated the FAO PROTIERRAS project in the Upper Mixtec, providing lessons learnt potentially useful for the Lower Mixtec.
 - Project “Mainstreaming of biodiversity within Mexican agriculture”, implemented by GIZ on behalf of the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU), providing synergies in the field of value chain development with local communities based on local agrobiodiversity in Quintana Roo, Campeche and Yucatan.

✓ **United Kingdom Comments:**

An initial agency response to the below comments from the United Kingdom was provided and can be found in the list of documents specific to the project in the GEF Portal.

- It would be useful if you can confirm there is government buy-in for the plans for renewable generation under this GEF project. Have the Energy Ministry SENER and the National Electricity Commission (CFE) been involved, are they agreeing/supporting the programme? Or would the generation be of smaller scale and/or disconnected from the national grid? What about the Environment Ministry SEMARNAT or the Agenda 2030 team in the President’s Office?
- The Work Programme for GEF Trust Fund document refers to private sector involvement (p. 7, 22). In light of the changes in policy in the energy sector, we would like to know whether there is support for this from the current federal level government.

66. Indonesia: Seventh Operational Phase of the GEF Small Grants Programme in Indonesia, UNDP (GEF Program Financing: \$3,561,644) (GEF ID: 10510)

✓ **Canada Comments:**

- We recommend that parties involved in implementing this project, particularly the multi-stakeholder governance platforms under Component 2 in Central Java’s Kendal and Wonosobo Regencies, consider lessons learned from the experiences of the nearby Margowitan Model Forest, established in 2004 in East Java. In terms of knowledge dissemination and upscaling activities, the International Model Forest Network (IMFN) and the Regional Model Forest

Network (RMFN) – Asia are voluntary global communities of practice whose members and supporters work toward the sustainable management of forest-based landscapes and natural resources through the Model Forest approach; there would be a great deal of insight based on experiences in similar implementation practices that would be very useful for this component of the project.

✓ **Germany Comments:**

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

Germany welcomes the proposal's focus on local community empowerment as well as its comprehensive gender approach.

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

- It is suggested to further elaborate on the involvement of local governments as potential change agents for an enabling environment to incentivize sustainable management practices.
- Germany recommends exploring collaboration with the following programs funded through German development cooperation:
 - Forests and Climate Change (FORCLIME) (2015.2116.0-0)
 - Peatland management and rehabilitation (2017.2053.1-0)
 - Sustainable Agriculture Value Chain (17.2054.9-001.00)

67. Global: GEF SGP 7th Operational Phase – Core (Part 2), UNDP (GEF Program Financing: \$61,538,462) (GEF ID: 10414)

✓ **United States Comments:**

- We do not support project activities that focus on reducing plastic, rather than on reducing plastic pollution.

✓ **Germany Comments:**

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

Germany welcomes this project, which is particularly ambitious in scope and scale. It holds a great potential to foster bottom-up sustainable development by targeting community-based initiatives, and particularly vulnerable populations such as women, youth, indigenous peoples and disabled people. Germany also welcomes the proposed strategic linkages between SGP-funded projects with other GEF activities to enable the former to be scaled up.

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

- Climate change resilience mainstreaming: although it is acknowledged that global environmental issues are interconnected, and that climate change is an underpinning cause, few adaptation-focused measures are suggested under the 7 strategic initiatives. It would be good to clearly identify the measures enabling resilience to climate change, as the phenomenon has an acute impact on the SPG's vulnerable population targets.
- Private sector (PS) engagement: even if PS engagement mechanisms are included in the project, the private sector concept remains vaguely described and undefined. However, the PS encompasses a broad group of stakeholders that require different engagement approaches, from potential project developers to capital providers and market facilitators, which should be considered by the SGP.
- Innovation and the take-up of commercial finance: it would be interesting to specify as part of the project's innovation and scaling up potential, to what extent it is intended that tested ideas through the SGP could push initiatives up the financing curve, for them to eventually be able to take on commercial rate finance, wherever that is possible.

NON-EXPEDITED ENABLING ACTIVITY

68. India: Preparation of India's Fourth National Communication (4NC) and Fourth Biennial Update Report (BUR4) to the UNFCCC and strengthening institutional and analytical capacities on climate change, UNDP (GEF Program Financing: \$4,566,000) (GEF ID: 10493)

✓ *Canada Comments:*

- Canada would appreciate more details on how the current funding model will ensure parties have appropriate and timely access to support while applying for, developing, and publishing these reports, given the uncertainty of timelines involved. We would also like to raise our concerns surrounding the initial implications that this project involves duplicative funding/work, and given these concerns, we would appreciate greater clarity and further details on how exactly the transition to the new report would unfold. We look forward to discussing this project in more detail in future consultations with the GEF.

✓ **Germany Comments:**

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

- For project component 1, Germany welcomes the detailing of information under national circumstances. Germany suggests that information on measures towards sustainable development and poverty eradication can also be included in project outputs.
- For project component 2, Germany supports the rationale for establishing gender balanced institutional structure. It would be helpful if more clarity could be given on the nature and form of these institutions. Germany welcomes the outputs of component 2 and suggests that efforts towards coherent data collection and assuring quality can also be an additional output under this section.
- For project component 3, Germany welcomes the outputs of component 3 and suggests the following:
 - Adopt the 2013 revised guidelines for formulation of GHG inventory.
 - Clearly define the roles and responsibilities of MoEFCC and other relevant stakeholders to be involved in establishment and management of the National Inventory Management System (NIMS).
 - Provide details of the pilot platform already launched for collecting data from industries particularly Micro Small and Medium Enterprises (MSMEs) along with steps for widening the coverage and bringing all sectors under the ambit of NIMS.
- For project component 4, Germany welcomes the outputs of component 4 and suggests monitoring of adaptation actions as an additional component. This should include development of sector wise indicators for adaptation monitoring.
- For project component 5, Germany welcomes the outputs of component 5 and suggests the following:
 - Provide clarity regarding how common modalities, procedures, and guidelines (MPG) as per Article 13 of the Paris Agreement will be adopted for the transparency of climate action and support with flexibility considering the national circumstances.
 - Develop sector-wise indicators for measuring progress on national actions to reduce GHG emissions.
 - Include reporting of emission reductions achieved due to domestic mitigation actions like Perform Achieve and Trade (PAT), Renewable Energy Certificates (REC) Mechanism, Clean Development Mechanism (CDM) and other voluntary carbon market mechanisms as part of the NIMS.
- For project component 6 Germany suggests that a mechanism for sharing best practices with developing countries from global south would be helpful.

- In project engagement and specified roles of project stakeholders it is mentioned that the MOEFCC will be better equipped to provide information for the chapters related to National Communication, GHG emissions from LULUCF and Forestry. Germany suggests that some clarification on how MoEFCC would be equipped for reporting requirements would be relevant.
- Germany also suggests including Ministry of Finance, Ministry of Agriculture, Ministry of Power, Ministry of New and Renewable Energy, Ministry of Chemicals and Fertilizers, Ministry of Civil Aviation, Ministry of Commerce and Industry, Ministry of Development of North Eastern Region, Ministry of Earth Sciences, Ministry of Heavy Industries and Public Enterprises, Ministry of Housing and Urban Affairs and Ministry of Micro, Small and Medium Enterprises in project stakeholders.
- We would also advise the GEF to seek synergies and exchange with the following projects of Indo-German Development Cooperation:
 - On behalf of the Federal Ministry for Economic Cooperation and Development (BMZ), the project Climate Adaptation & Financing in Rural India (CAFRI) is being implemented with the Ministry of Environment, Forest and Climate Change (MoEFCC) as the nodal ministry. Germany recommends seeking an exchange on its approach for climate change adaptation implementation and monitoring.
 - On behalf of the Federal Minister for the Environment, Nature Conservation, and Nuclear Safety, (BMU) the project Supporting the Institutionalisation of Capacities on Climate Change Studies and Actions (ICCC) is being implemented with Ministry of Environment, Forest and Climate Change (MoEFCC) as the nodal ministry. Germany recommends seeking an exchange on its approach for capacity building on climate change mitigation and adaptation issues.

✓ **Japan Comments:**

The below comments from Japan were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- On project 10493 (*Preparation of India's Fourth National Communication (4NC) and Fourth Biennial Update Report (BUR4) to the UNFCCC and strengthening institutional and analytical capacities on climate change*): We would like to have some clarity on whether this type of support will be duplicative or not, with the subsequent need to file a Biennial Transparency Report (BTR) by 2024, and would like to seek the Secretariat to consider the timing/ effectiveness/ efficiency of projects of this nature.

*Projects with Non-Grant Instrument

**These are multi-trust fund projects. Only the GEF Trust Fund component is presented in this Work Program. The LDCF or SCCF components are presented separately in the LDCF/SCCF Work Program