



**GLOBAL ENVIRONMENT FACILITY**  
INVESTING IN OUR PLANET

COMPILATION OF COMMENTS  
SUBMITTED BY COUNCIL MEMBERS  
ON THE GEF  
DECEMBER 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 December 2020 Work Program**

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**DECEMBER 2020 GEF WORK PROGRAM: COMMENTS FROM  
COUNCIL MEMBERS (REFERENCE: GEF/C.59)**

## **IMPACT PROGRAMS**

### **1. Global (Madagascar): Food Systems, Land Use and Restoration (FOLUR) Impact Program- Addendum III, FAO, [GEF Program Financing: \$ 9,874,117] [GEF ID 10726]**

#### ✓ *Germany Comments*

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

- Based on the lack of coherence of the different project components, Germany kindly requests a revision of the project component structure so that the different components build on each other. It further recommends a clearer delineation of the targeted regions / of which communities will be addressed by the project.
- The project description could also outline more clearly on which basis the envisaged impacts are calculated, i.e., which indicators and underlying methodology is used (e.g. how has the indicated number of addressed hectares or tons of CO2 equivalents been calculated, what does “number of enabling environments” mean?).
- The project’s ecovillages focus on conservation as a model for reducing deforestation, using a conservative approach, in which the aspect of sustainable development should be integrated. The sustainability of such an approach, disconnected from the commune / municipality as an administrative unit, must be critically assessed.
- Moreover, the foreseen engagement on the coffee value chain could easily be linked to other donor activities, such as to the German Development Cooperation’s program on natural resources protection and management, PAGE, as well as its project on agricultural value chains in the context of climate change, PrAda, both of which work on strengthening value chains of certain cash crop. Germany therefore recommends covering these details in a separate section to ensure coherence in the provided donor support.
- Likewise, synergies could be created through collaboration with the GEF7/FAO project “Biodiversity Conservation, Restoration and Integrated and Sustainable Management of the Lower Mangoky and South Mananara Watersheds”, which will be partly implemented in the same area.
- Finally, Germany recommends revising the classification of the Rio Markers (currently “mitigation”) or to include a brief explanation on the current classification, as from the provided information the foreseen project approach for Madagascar would equally fall under the category of climate change adaptation from a technical point of view.

#### ✓ *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.*



Tropical forest-related programs (GEF ID #10726, 10689, 10678, 10718, 10688):

- We welcome these important tropical-forest-related programs, especially as they relate to productive forest supply chains and landscape restoration, which are issues that require urgent global attention. We support a rigorous data-driven approach to this field, and wonder whether the focal agency on forest-related supply chain/ trade matters within the CPF and the main data provider for tropical forests to the FAO is involved i.e. the International Tropical Timber Organization (we only see the TFA mentioned). To better align with an inclusive multi-stakeholder approach, we request the involvement of specialist organizations/platforms as these with the relevant global data, expertise and networks to ensure efficient and effective approaches to relevant stakeholders and to reduce duplication of effort in the global arena. The organization also has relevant indicators and guidelines on legal and sustainable supply chains and forest landscape restoration related to tropical forests, which can help assess and measure impact of relevant projects.

## **OTHER PROGRAMS**

### **2. China: Yangtze River Basin Biodiversity Conservation Programme, IUCN, [GEF Program Financing: \$6,422,018] [GEF ID 10710]**

#### ✓ Germany Comments

Germany approves the following PIF 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 would like to suggest that the proposal considers creating and strengthening sufficient local ownership. The proposal to initiate a 10-year fishing ban should include this perspective. Although this is probably necessary from a conservation perspective such a measure has to be flanked by compensation, explanation and chances for alternatives if it should get acceptance and ownership by local people. Additionally, it needs means of enforcement to be really implemented. Mainstreaming should not only target businesses and local governments, but also communities and e.g. farmer's and fisher's associations. The same is true for the planned improvement of more than 1 million hectare of protected areas: If the improvement includes banning of activities of local people (legal or illegal) and stricter control of violations an acceptance by locals is hard to reach. Alternatives and compensations should therefore be part of the strategies.
- Furthermore, in the list of consulted entities Indigenous and Local Communities are ticked. Nevertheless, in the following table 3 on stakeholder engagement they are not mentioned as a category. If ILCs exist and have been consulted, they should also be mentioned in the list of stakeholders since otherwise they cannot have been consulted.
- The links to Aichi-Targets are listed in the proposal. We would like to suggest elaborating and extending this aspect to respective Sustainable Development Goals, including SDG 14 and 15 (biodiversity) and those dealing with poverty reduction, reducing hunger, provision of clean water (SDG 6) and others.

- The funding programme “CLIENT II” by the German Federal Ministry for Education and Research (BMBF) is currently financing several water-related adapted research projects in the Shanghai area. Although the Shanghai area is not an explicit target region of the proposal the targeted input into political decision making on several levels is meant to influence the basin, including the Shanghai region. The BMBF project office "Clean Water," Shanghai, (<https://www.bmbf-client.de/en/offices/shanghai>) helps to coordinate these projects. Findings of the programme could be relevant for the implementation of the proposed project.

✓ **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.*

- Biodiversity-related projects: We note that this is the focal area that garnered most allocation as per GEF-7 framework. Some of the proposals are rather vague, and requires more succinct description of why/what funds are going to be used for, and what non-protected area is going to be the target for funds (e.g. GEFID 10710 description is confusing, with mixed references to protective and production areas. What “production” areas are under consideration? We look forward to seeing a more detailed description for projects as these for approval).

✓ **Norway/Denmark Comments**

- The proposed project is highly relevant and has a solid baseline description that justifies the project interventions. The criteria for selection of provinces (Sichuan, Jiangxi and Anhui) as the main geographical target area also seem justified.
- There is strong ownership at the highest political level in China to the efforts of managing the Yangtze River Basin more sustainably, as evidenced by numerous initiatives by the Central Government, including the 10 year ban on fisheries in the Yangtze River. Solid ownership on the Chinese Government side is also demonstrated in the project proposal, through resource mobilization and in-kind contributions.
- Strengthened cooperation and coordination between the Ministry of Environment and Ecology (MEE) and the National Forestry and Grassland Administration (NFGA) is welcomed and would in itself be an important result of the project. Achieving the expected results from the project intervention, in particular from outcome 2, will also require strong involvement from other parts of Government, in order to address the current drivers of biodiversity loss in the region. It seems necessary to work with sector authorities on both central and province level, and the project partners could be challenged to (further) develop a stakeholder analysis and engagement plan to ensure different sector authorities will also work in alignment with the objectives of the project.
- The approach to achieve strengthened resilience and sustainability through nature-based solutions is of high value and could serve as an example for similar initiatives in other parts of China and internationally.

✓ *United States Comments*

- We recommend greater clarity at the next phase of project development on how projects 10701 and 10710 will be coordinated in overlapping areas of improving biodiversity conservation and protected area management of Giant Panda National park.

## STAND-ALONE FULL-SIZED PROJECTS

### NON-GRANT INSTRUMENT

#### 3. **Regional (Africa): COVID-19 Off-Grid Recovery Platform, AfDB, [GEF Project Financing: \$13,000,000] [GEF ID 10667]**

✓ *Germany Comments*

Germany approves the following PIF 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:

- We appreciate the project proposal, which is both a great example of donor coordination and well aligned with needs on the ground.
- Due to the high number of countries and numerous stakeholders, we would appreciate if relevant stakeholders for all countries and all program components, including regional and national agencies, technical stakeholders (implementation phase), strategic partners and relevant companies could be identified in the final proposal, detailing coordination and knowledge management mechanisms.
- We welcome the provided knowledge management strategy, and would appreciate if a section on GEF-partnership-level sharing of experiences on i) energy access, ii) private sector engagement in fragile contexts, and iii) Covid-19 response could be added.

✓ *Norway/Denmark Comments*

**General comments:**

- The objective of the project is highly relevant considering recent projections that the progress made on energy access in Africa will suffer considerably due to the Covid19 pandemic, with a risk that 30 mill. Africans who today have access will lose this (IEA).
- We support the mechanism and the intentions behind the CRP and recognize the considerable financial needs of the off-grid sector. We would however like to see more detail in the project document on the administrative, financial and partner relations and on the projects assumed GHG emission reductions and type of mini-grids to be installed.

**Specific comments:**

- The PIF states that ‘Up to 1% per annum may be charged on CRP funds deployed at transaction level to support additional costs incurred in managing CRP funds. 1% refers to the “principal amount executed in each underlying transaction and will be charged to

the end borrower”. It should be clarified if this fee will go to AfDB in addition to the 9% GEF agency fee, and if so, if this is in line with the GEF Agency fee policy

- The PIF describes the executing agency as the ‘Partner Funds’, listed in Annex E. We could not find this information in Annex E. We have however been able to establish that FEI OGEF, EEGF, and SIMA are the three preselected Partner Funds. AfDB is one of the investors in FEI OGEF’s (see FEI OGEF web page). The project document should provide more detail on the relationship between FEI OGEF and AfDB to ensure good governance.
- The PIF provides limited information on operations and governance of the CRP. It is not clear how the CRP will be managed, how much human resources will be dedicated to managing the CRP, and who will fund the management. We would like to see the budget lines for the operational/management costs of the project.
- There could be a risk that the CRP crowds out existing debt funds by giving preference to the three pre-selected funds, while other debt funds do not receive concessional capital from CRP. They should lend at market rates and may not be able to compete with the pre-selected funds. Companies will likely prefer lending terms from the pre-selected funds as opposed to market rate financing. We would like to see a more thorough risk analysis of crowding out in the final project document.
- There are a limited number of stable, mature, and investment ready off-grid companies in sub-Saharan Africa. Stable, low-risk companies may obtain funding from a number of debt providers. There is a risk that the pre-selected Partner Funds may have overlapping portfolios, in turn concentrating and limiting diversity of funding. We recommend that a mechanism to prevent overlapping funding and/or fund concentration is put in place to ensure that funding is not concentrated towards a small number of companies. It should be considered whether each company should be awarded CRP funding only once.
- In a difficult Covid19 financial climate, Partner Funds may be inclined to prioritize large loans to ensure profitability and reduce costs. This may lead to smaller companies missing out of the CRP. The CRP must be designed to ensure that also smaller credit lines are available, to the benefit of small and medium sized enterprises.
- The project aims to install 500,000 new solar home systems (SHS) and ensure that 650,000 SHS remains in use. A SHS is estimated to give an average of 50watt, which leads to a total of 25MW SHS installed from the new systems alone. Does this mean that there will 2MW of green mini-grids (GMG) installed? If so, this is less than the 20% share described in the document. We would like to see more detail on what the 27MW of installed capacity should consist of (how many GMGs, type of SHS).
- It is estimated that each SHS avoids 0,37tons CO<sub>2</sub>e/year, which totals 1,295million tons after 7 years. The reductions from the systems that will remain in service (0,37tons Co<sub>2</sub>/year\*3 years) totals 721,500tons, giving a total of 2,02million ton CO<sub>2</sub>e avoided. Shall it be assumed that the remaining emissions reductions come from the GMG?
- The estimate of 2.5 million tCO<sub>2</sub>e in avoided emissions is based on estimates that 650.000 existing connections will be preserved following the intervention. The CRP aims to prevent existing power producers from going bankrupt due to the Covid-19 pandemic. If one or more of the producers did go bankrupt/incur losses, then the total number of

preserved connections could change. The project should provide a risk analysis of this scenario.

- We would like to see more detail on how the emissions reductions are calculated. The emissions reductions are based on assumptions, an analysis of the impact if some of the assumptions change would be beneficial (Example: If the energy replaced is not diesel generation/kerosene but grid, the 650,000 existing connections cannot be maintained). Based on the number of assumptions underlying the carbon emission calculations, the emissions avoided could be stated as an interval/range to reflect the uncertainty. 2.5 million tCO<sub>2</sub>e avoided seems to be on the higher end of such an interval.

✓ **Switzerland Comments**

- We urge AfDB to avoid duplication / ensure complementarity between CRP and its existing energy access financing initiatives, in particular the most recent ones such as (the private sector envelop of) CRP COVID-19 Rapid Response Facility (CRF) as well as other initiatives, such as Energy Access Relief Fund (EARF) and the mentioned sector-wide grant initiative (p. 18, neither of which is off the ground though).
- We encourage that CRP's monitoring and reporting activities cover the end borrowers (i.e. energy access companies / DESC0s) as well as their clients, namely the household / consumers.
- Despite the emergency / urgency of the situation due to COVID19 not lose sight of issues such as battery recycling and reduction of e-waste, which haven't been dealt with sufficiently / conclusively yet by the sector.

✓ **United States Comments**

- There has been a great growth in off grid and microgrid development in the last 5 years however consumption remains low. The project is trying to avoid slow down or reversal of the trend during the pandemic. Funds can indeed support insolvent developers and investments can provide growth within the 2-year lag expected. However, it is also evident that GDP growth will remain slow for the next few years and investment would be best served in regulatory improvements and coordination that can support longer run prospective.
- In future stages of this proposal, we would like to see how off grid development and national rural electrification plans will be coordinated.
- We would like to see further information on how indigenous people are and will be involved with this project.

## BIODIVERSITY

### 4. Regional (Congo DR, Madagascar, Namibia): Strengthening the Implementation of National Biosafety Frameworks in Southern Africa (SINBF), UNEP, [GEF Project Financing: \$2,858,390] [GEF ID 10584]

#### ✓ Canada Comments

- Modern biotech was not specifically implicated by IPBES as a direct or indirect driver of biodiversity loss, but the biosafety angle (managing potential modern biotech threats to sustainable use and conservation) is complementary to CBD work re. Art. 8(g) (if not Aichi as there is no biosafety target). Canada supports the Secretariat's recommendation.

#### ✓ Germany Comments

Germany approves the following PIF 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:

- Under the identified risks for the category Human Resources, the following risks seem to be identical: high staff turnover and constant changing of staff. It would be good to clarify the difference between those or otherwise combine them into one. In addition, the mitigation measures would have to be strengthened. These risks are listed as medium risks, however at NCRST for example, the staff turnover rate is a great concern and affects sustainability of capacity building measures. The area of intervention of this project is of a specialized technical nature and this would require strong and convincing mitigation measures.
- In terms of feasibility of the project, we would also like to suggest that all relevant ministries in the countries are involved. In case of Namibia, the NCRST and the Biosafety Council would have to work closely with the Ministry of Agriculture, Water and Land Reform (MAWLR), as this Ministry controls seed imports and is the focal point for phytosanitary issues.
- Another area that also might benefit from strengthening is capacity building at tertiary level. In addition to the current involvement (scientists, academia) through consultations, workshops, trainings, inclusion in technical advisory panels, etc.), the development of a targeted biosafety academic programme to ensure continuation of the human capital development in the area could be beneficial, for example the introduction of a biosafety stream within the law faculty to ensure lawyers are trained in biosafety and being able to assist in legal issues that may arise in the area.
- Furthermore, training of immigration / customs officers might not be sufficient as this is usually a one-time occasion and the investment is lost when the trained person leaves. We would therefore like to suggest that such training is provided on a continuous level - where applicable - integrated into the education programmes of these officers.
- Academic research as well in the area or the establishment of a Biosafety Research Committee in partnership with an academic institution could help in supporting the Biosafety Advisory Council. At the moment, members within the Council represent

different organs and come from different backgrounds, but the Council does not have the capacity to conduct research in order to provide informed decision-making for applications submitted. A research institution or committee could play that role and also play a technical role in monitoring and evaluation while building capacity of researchers in the country and providing temporary and full-time employment to young science graduates.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- The title is a bit unusual because the Congo is not exactly ‘southern Africa’ and Madagascar is usually referred to as the Indian Ocean. Does Namibia need this support?

**5. Brazil: Strengthening Participatory Natural Resource Management Processes for Sustainable Economic Development, Conservation of Biodiversity and Maintenance of Carbon Stocks in Amazon Wetlands, FAO, [GEF Project Financing: \$3,411,644] [GEF ID 10706]**

✓ **Canada Comments**

- Canada understands that the project will intervene in multiple protected areas (PA) and buffer zones in the Amazon Wetlands. Specifically, the project will implement capacity building programs and provide technical support on agroforestry, non-timber products, forestry, pirarucu, caiman and mangrove crab management, as well as community. The project is planning to build and equip physical infrastructures within the PAs and their buffer zones. According to the ESMG this qualifies the risk as “high” and requires preparation of a full environmental and social impact assessment (ESIA). The project also involves indigenous peoples and traditional communities which requires the preparation of an Indigenous Peoples Plan (IPP) if a substantial number of project beneficiaries are indigenous and to follow a Free, Prior and Informed Consent process (FPIC) for all activities targeting indigenous peoples. It would be necessary to ensure that ESIA and IPP are adequately prepared.
- Overall, Canada views the project proposal as well-written and demonstrates effectiveness of community-based natural resource management in critical ecosystems such as mangroves and floodplains. However, adaptation benefits are not clearly discussed in the project documentation. The success of this project will depend on whether or not local people will benefit more from biodiversity-friendly value chains than illegal extraction, as is currently the case. STAP acknowledges that on scientific or technical grounds this project has merit. Canada supports the Secretariat’s recommendation.

✓ **Norway/Denmark Comments**

**General comments:**

- Key assumptions in the theory of change may not take sufficiently into account contextual organizational and policy alterations, mainly regarding governmental stakeholders.

- The risk analysis and mitigation measures on the lack of involvement of governmental stakeholders could be underestimated, leading to an unrealistic alignment between the project goals and the current Brazilian biodiversity policies;
- It is essential to secure good buy-in at the highest political level in Pará and the other states included in the project, especially having in mind the barriers identified in the ToC regarding technical and organizational capacity and governance.
- Suggestion of further analysis on the sustainability of the project without/with less co-financing, in-kind support, and/or structural public policy backing;
- Informed “National Center for Applied Technologies – Water (NCAT)”, under the Ministry of Science and Technology of Brazil (MCTI), is not currently an existing institution under the Ministry of Science and Technology of Brazil.

**Specific comments:**

- Component 1. Strengthening the enabling environment to sustainably manage Varzea floodplain forests and mangrove wetlands. (capacity development)
  - Participatory processes require an analysis of power relations both between the target groups and between the target groups and those who are responsible for these processes. Such an analysis is lacking in the project document. Some more information can be provided on the empowerment of the local stakeholder. This point might be of higher relevance if considering that Brazil has a strong Agri-business sector (on a general basis). This analysis can be preventive and be useful in the mechanism to resolve conflicts reported under “Key assumption for the Theory of Change”.
  - Communication strategies can be considered to be included in this component.
  - Not much is explained on how the private sector is involved, something that can be necessary to include in detail, given the strong private sector in Brazil. According to the project document: “The private segment participating in the value chain is represented by associations of producers who will be directly beneficiaries of the project, and intermediaries and secondary beneficiaries.”
- Component 2. Sustainable use of protected areas and productive landscapes (implementation of the management plans and activities related to value chain development)
  - When working with the value chains of a product it is important to include an analysis of the supply and demand from the national and international market, at it is strictly related. This could also work as risk reducing measure.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- There could be a risk on delivery. This is mainly related to FAO eventually sub-contracting/outsourcing project implementation to third sector agencies. There seems to be an intention from the Brazilian Government to impose control over the performance of



non-governmental organizations (NGOs) in the Amazon, in order to have them fully scanned and monitored by 2022. If the Brazilian Government intentions materialise, we foresee a direct repercussion on donors, government or international organisations being prevented from making financial transfers to NGOs, which jeopardise final project delivery and effective impact on the ground. The UK are closely following demonstrations from environmentalists and jurists explaining that idea is unconstitutional and threatens civil rights.

✓ **United States Comments**

- We are very supportive of this project's aims, and the focus on community lead interventions. This is a very targeted project that makes a strong case for community-based natural resource management. Our domestic reviewers appreciate the flexibility for stake holder engagement within this proposal, however, the level of detail does not present a clear understanding of the management of this project, which leaves us uncertain of the successful trajectory of this project.
- On page 41 of the PIF, it states "The M&E strategy of the project will be formulated with the relevant stakeholders and the expected results will be clearly defined, as well as the expected time frames for its achievement and confirmation through objective indicators and means of verification." We are concerned this approach, while again offering flexibility and opportunity for stakeholder engagement, might not lead to as ambitious outcomes.
- We would like to see more developed risk management and mitigations strategies. This project is rated as a "high-risk" project by the GEF, and the proposed mitigation strategies are not sufficient for the level of risk posed. This project's success hinges on community participation, and the guidance and support of community leaders. Currently, the mitigation strategies focus on mapping risks, and developing plans, but does not adequately address those risks.

**6. China: Transformational Wildlife Conservation Management in China, UNDP, [GEF Project Financing: \$5,786,073] [GEF ID 10701]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **United States Comments**

- We welcome the project's stated goals of improving wildlife conservation, but have concerns about the ability of the project's proposed activities to effectively address the key threats to wildlife and achieve the stated conservation goals. Beyond habitat fragmentation, these include high levels of consumption and lack of political will to

reduce demand. The project would benefit from a clearer statement of the specific threats to wildlife, their relative importance, and how the project's activities explicitly address those threats could help clarify the projects anticipated outcomes.

- Given that inadequate consultation with and opportunities for local communities and livelihood demands for natural resources are listed among the root causes of biodiversity decline in production landscapes and biodiversity mainstreaming in China, we also recommend additional consideration in the design phase of the project to how local communities will be better involved in conservation and planning.
- Given the continued existence of major loopholes in the revised wildlife laws, we are concerned that lack of political will is a more substantial obstacle than lack of interagency coordination (which the project addresses) and may hinder the project's proposed work on policy. We recommend the inclusion of information about addressing the risks/assumptions around political will.
- Real-time monitoring is most useful in areas where poaching is the dominant driver of wildlife population declines and where on-the-ground ranger effort can be tasked for immediate response. Real-time monitoring and the development of shared data infrastructure, while very powerful, can be prohibitively expensive. We would encourage the project to explore the most tractable, maintainable options that provide sufficient information for the proposed landscape-level conservation support

**7. Colombia: Conservation and Sustainable Use of the Ciénaga Grande de Santa Marta, IADB, [GEF Project Financing: \$8,219,178] [GEF ID 10567]**

✓ *Germany Comments*

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

- The incentive scheme which will be created and reach most of the livestock and agricultural farms in prioritized watersheds to foster forest conservation and improve land management focusing on water use efficiency should favor ecosystem adaptation measures. The program should develop these adaptation measures and promote those with the private sector and indigenous communities.
- Inefficient and illegal use of water resources is widespread in the ecoregion, resulting in the water from the rivers not reaching the wetland complex during the dry season. Disruption of the hydrological dynamic affects the conservation status of threatened species. Control measures should thus be developed by the stakeholders themselves and implemented by the government agencies. This should be reflected in the risk management section of the document.
- With the establishment of the Interinstitutional Coordination Committee (ICC) for the Integral Management of the CGSM, the project aims for strong participation of the Tayrona Indigenous Confederation (CIT) and the Territorial Council of the Indigenous Governors of the SNSM (CTC). However, in order to develop and implement the innovative governance model, it would be important to ensure participation of all stakeholders - especially farmers and agri-businesses who are capturing an excessive amount of water before it reaches the Ciénaga and thus contribute to the alteration of the

water balance. Germany would thus like to request that broad stakeholder engagement from the start is ensured.

✓ *United States Comments*

- We recommend greater clarity on how the technical study to identify forest corridors will be essential to this project.

**8. Fiji: Safeguarding Marine & Terrestrial Biodiversity in Fiji (SAMBIO), CI, [GEF Project Financing: \$7,255,491] [GEF ID 10675]**

✓ *Germany Comments*

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

Germany welcomes this proposal, which aims to broadly support Fiji's protected area network  
Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany suggests to present more details on the specific distinction of this newly proposed GEF-investment to other cited and ongoing initiatives in Fiji. For example, under Outcome 2.3 the development of a management plan for the Lau Seascape is announced. As there is already an inter alia GEF-CI implemented project (GEF-7 ID: 10375, Blue Nature Alliance; 2020-2022) with the aim to establish the Lau Seascape, it would be beneficial to learn more about the complementarity of the two projects.

**9. Gambia: Effective Implementation of Access and Benefit Sharing of the Nagoya Protocol and Integration into Planned Co-management Arrangements in the Nyambai Forest Park of The Gambia, UNEP, [GEF Project Financing: \$3,074,886] [GEF ID 10677]**

✓ *Canada Comments*

- The objective of this project does not clearly relate to the problem diagnosis which is a description of the many interrelated threats facing biodiversity in the Gambia, including habitat loss, pollution and uncontrolled wildfire, caused by complex drivers. According to the STAP assessment, it is not clear how these broad biodiversity threats will be addressed by establishing an ABS regime. The project itself plans to only establish the enabling environment and some pilot efforts – it does not appear feasible to actually deliver the stated global environmental benefits in the timeframe involved. The STAP assessment has identified minor issues to be considered during project design and cleared the project for technical clearance. Canada supports the Secretariat's recommendation.

✓ *Germany Comments*

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

- Germany would like to acknowledge the relevance of the proposed objective and the involvement of the government agencies to strengthen the implementation. We would like to emphasize that the foreseen outcomes and outputs for setting up an effective national ABS system are sequential and interdependent. The proposal needs to set up a

logic timeline that e.g. foresees negotiation of ABS contracts coming after the adoption of the legal basis.

- The project logic should take into account that monetary benefit sharing in many cases only can be expected after many years of R&D with no guarantee for commercial success. In order to securing monetary benefit sharing in support of biodiversity conservation, the project should focus on developing ABS approaches for high-value biodiversity-based value chains.
- Germany also suggest reviewing those outputs/outcomes that mention “adoption” of official documents. The result of acts of parliament / government are not under control of a (GEF) project and should not be element of project outcomes/outputs.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- This is a lot of money for creating an ‘enabling environment’ and “commercialisation of genetic resources” from a Forest Park. Will there be safeguards or vetting in place? If the projects is a Payments for Ecosystem Services scheme to help an otherwise underfunded protected area, that’s acceptable, but this seems like it could have unintended consequences.
- Also, the project’s COVID19 screening. It seems like UNEP projects used similar language across two projects (this one and one in Madagascar) to explain why countries can handle COVID (“long experience of pandemic disease management”). Is this an accurate assessment of the situation?

**10. Haiti: Improving the Flow of Ecosystem Services in Biologically rich Watersheds of the Southern Region of Haiti, UNDP, [GEF Project Financing: \$5,055,479] [GEF ID 10684]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Germany Comments**

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

- Under component 1, the project aims to identify gaps in the current environmental legislation at the national level in terms of specific angles that prevent the full mainstreaming of BD conservation into watershed planning. Based on the analysis, the project then aims to make recommendations for draft updated laws and regulations for invasive alien species and genetic resources. In order to be most effective, the project

would greatly benefit from not only recommending draft legislation but making an effort to pass and implement the envisioned legislation. Considering that one of the barriers identified is the lack of adoption and implementation of laws, the project should more strongly aim at overcoming this barrier by identifying means of passing and implementing legislation accordingly.

- This component also foresees training to stakeholders to better understand how environmental rules and legislations should guide their activities. Which rules and regulations is the project referring to? Germany would like to stress that in this regard, it would be even more important for the project to work towards passing and implementation of new/updated legislation (see comment above).

**11. India: Mainstreaming Natural Capital Values into Planning and Implementation for Sustainable Blue Economic Growth in Indian Coastal Districts, UNEP, [GEP Project Financing: \$3,046,347] [GEF ID 10385]**

✓ **Germany Comments**

Germany approves the following PIF 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 very much supports the idea of establishing SEEA-based NC accounting as an important tool for the mainstreaming of biodiversity and natural capital into national policy and planning processes. For the project to be successful, we would like to stress the importance of governmental backing and involvement in the process of establishing the required frameworks. Even more so, it will be crucial to not only draft corresponding frameworks and policies but to actively work towards their adoption and implementation. We would therefore like to suggest that this aspect is particularly paid attention to in the course of project implementation, and involving all necessary stakeholders, considering that development and adoption any governmental policies and frameworks can turn out to be very lengthy and time-consuming.

**12. Indonesia: Investing in the Komodo Dragon and other Globally Threatened Species in Flores (IN-FLORES), UNDP, [GEF Project Financing: \$ 6,284,018] [GEF ID 10728]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ Canada Comments

- Canada believes it is worthwhile to note that, from the perspective of maximizing biodiversity outcomes, it would be beneficial for this project to focus on all relevant threatened species and not solely the Komodo dragon.

✓ United States Comments

- We understand there were concerns from environmentalists, conservation experts, CSOs, and community and local leaders about the lack of communications and poor field management associated with recent efforts to improve Labuhan Bajo and surrounding areas, including the Komodo habitat, and planned to transform the area as a premium tourism destination. We would appreciate greater clarity at the next phase of project development on how these concerns will be addressed.

**13. Indonesia: Strengthening Capacities for Prevention, Control and Management of Invasive Alien Species (SMIAS) in Indonesia, FAO, [GEF Project Financing: \$4,416,210] [GEF ID 10705]**

✓ Germany Comments

Germany approves the following PIF 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 welcomes the project proposal and would like to suggest the following points for improvement:
- Under component 1, output 1.3.1 – Financing mechanisms to support IAS management developed and tested would benefit from a more specific description of objectives and means of implementation. With a view to the long-term sustainability and ongoing financing of project activities, it would be very important to understand better how the financing mechanisms will work.

✓ United States Comments

- We recommend greater clarity at the next phase of project development on how the NISSAP work with the Omnibus Law's Horticultural import/export regulations.
- The introduction of exotic species, to control other exotic species, seems very risky in terms of further contributing to the problem. The safeguards are not sufficiently clear nor strong to ensure that the introduction, testing, and use of exotic Biological Control Agents would not further harm biodiversity.

**14. Madagascar: Inclusive Conservation of Sea Turtles and Seagrass Habitats in the North and North-west of Madagascar, UNEP, [GEF Project Financing: \$ 3,370,320] [GEF ID 10696]**

✓ France Comments

Coordination with other projects, for instance financed by the FFEM:

- This project is related to the WIOCOR project by IUCN which will target seagrass beds in the Indian Ocean, particularly in Madagascar, with the support of FFEM. An alignment between IUCN and UNEP on these projects is necessary.
- Link also possible with the projects of RASTOMA network on turtles funded through FFEM's [small-scale initiatives program](#).

✓ **Germany Comments**

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

Germany welcomes this proposal, which addresses integrated approaches for inclusive conservation of sea turtles and seagrasses and the sustainable management of their habitats in North west Madagascar. It is clearly structured and well-focused.

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

- Germany suggests to put a strong focus on stakeholder engagement in the coming project phase. As mentioned in the PIF-document the consultations so far – due to COVID-19 - were constraint to the central level. As remote small-scale fishers will be heavily affected in their lives and livelihoods, their early and thorough involvement will be crucial for sustainable and successful project outcomes.
- Germany suggests to consider the FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries (VGSSF) and related sources for finalizing the project proposal.

✓ **United States Comments**

- This project proposal seems significantly limited by travel restrictions due to the COVID-19 pandemic. These conditions resulted in no consultation with local or indigenous communities, which will be critical both for the success of this project and for the appropriate application of the GEF Policy on Environmental and Social Safeguards. If the COVID-19 pandemic had such a disruptive effect on the proposal preparation process, it is difficult to believe that the project will be successfully implemented if the pandemic conditions continue.

**15. Mexico: Fostering Sustainable, Legal and Traceable Use and Trade of Wild Native Species in Mexico, UNDP, [GEF Project Financing: \$9,791,743] [GEF ID 10689]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **France Comments**

Coordination with other projects, for instance financed by the FFEM:

- Project where there may be links with the "Paisaje biocultural" project in Jalisco co-financed by AFD and FFEM.

✓ **Germany Comments**

Germany supports the project proposal and its objectives. The project aims to promote the sustainable, legal and traceable use and trade of wild native species in order to reduce biodiversity loss and improve livelihoods in selected landscapes throughout Mexico. This proposal would be of great importance given the economic, social and environmental impacts of the COVID-19 pandemic and the surge of possible threats to human health caused by zoonosis. Biodiversity and natural resources, including wildlife, are facing growing threats from extended land use, deforestation and the reduction of natural habitats. As government programmes focus generally on economic and social aspects (poverty reduction, improvement of rural livelihoods), concepts to improve sustainable and biodiversity friendly management practices in the context of combating the pandemic and "green recovery" are therefore urgently needed.

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

- To enhance the effectiveness of the project outline we would like to provide the following suggestions for improvements to be made during the drafting of the final project proposal:
- In general terms the relationship between wildlife management, the use of native species for commercial purposes and the underlying threats to human health and well-being is not sufficiently addressed. These aspects should therefore be reflected in the project's theory of change, as well as specific project components.
- The opportunities linked to the COVID-19 pandemic should be highlighted. It is only seen as a restriction for project implementation, but the proposal does not comprise possible solutions for avoiding zoonosis.
- Executing and implementation partners, especially CONABIO, have a long standing and sound experience regarding the issues and outcomes to be developed by the project. Nevertheless, the risks associated to growing budget constraints (austerity policies) and subsequent impacts for technical implementation and counterpart contributions should be reflected in the projects "risk section". Further, potential mitigation measures should be devised.

✓ **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.*

Tropical forest-related programs (GEF ID #10726, 10689, 10678, 10718, 10688):

- We welcome these important tropical-forest-related programs, especially as they relate to productive forest supply chains and landscape restoration, which are issues that require urgent global attention. We support a rigorous data-driven approach to this field, and



wonder whether the focal agency on forest-related supply chain/ trade matters within the CPF and the main data provider for tropical forests to the FAO is involved i.e. the International Tropical Timber Organization (we only see the TFA mentioned). To better align with an inclusive multi-stakeholder approach, we request the involvement of specialist organizations/platforms as these with the relevant global data, expertise and networks to ensure efficient and effective approaches to relevant stakeholders and to reduce duplication of effort in the global arena. The organization also has relevant indicators and guidelines on legal and sustainable supply chains and forest landscape restoration related to tropical forests, which can help assess and measure impact of relevant projects.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- We understand that experience of working with the Sembrando Vida programme has not had the most successful implementation or MRV associated with it. However, if this is an opportunity to strengthen the programme's current work it could be a good project with strong buy-in from the government.
- We note the reference to budget cuts, and this project picking up costs for CONABIO to be able to continue data collection, until they receive funding again in budget next year. Can we be confident that it will not create a precedent?
- There is reference to engaging with indigenous groups and collecting data in 5 sites where IWT takes place (maps p. 64 ff). There might be a risk of the project taking Covid-19 to these communities – how will this risk be managed/mitigated? – note reference in risk register p. 52 to do videoconferencing until situation improves; will that be possible given remoteness, connectivity issues?

**16. Mexico: Green and Inclusive Recovery in Mexico (GreenMex): Making High-value Ecosystems and Rural Livelihoods More Resilient and Sustainable in a Post COVID-19 Scenario, FAO, [GEF Project Financing: \$10,103,670] [GEF ID 10717]**

✓ **Canada Comments**

- This is an ambitious program, which is well organized and may achieve significant environmental and social benefits based on nature based solutions. The most innovative aspect of this project has to do with its effort to mainstream biodiversity into a social program that is meant to alleviate poverty in rural areas. Canada believes this project is well-conceived that could serve as a model elsewhere and should be supported.

✓ **Germany Comments**

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

Germany supports the project proposal and its objectives. The project aims to mainstream biodiversity conservation, integrated landscape management and ecosystem connectivity into social policies and programmes in Mexico. This is even of higher importance given the economic,

social and environmental impacts of the COVID-19 pandemic. Biodiversity and natural resources are facing growing threats from overuse and climate change. As government programmes focus generally on economic and social aspects (poverty reduction, improvement of rural livelihoods), activities to improve sustainable and biodiversity friendly management practices in a context of integrated landscape management are therefore urgently needed. To enhance the effectiveness of the project outline we would like to suggest the following points:

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

- Component 1: The project indicator 1 (20% of the “Sembrando Vida” Program sites implementing environmentally friendly territorial plans) seems to be of low ambition given the scope of the Sembrando Vida Programme and should therefore be enhanced. In addition, there is no mentioning of the expected diversity of plants and trees’ species (incorporating native species of sociocultural importance and with economic potential), necessary to avoid monoculture and to promote agroforestry.
- Component 3: Project indicators 3 (at least two inclusive business models implemented/landscape) and 4 (at least 10 social economy organizations that participate in inclusive value chains of importance for BD and food security/land-landscape) seem to be too ambitious for durable impacts on the ground and should therefore be extended.
- In order to have a clear administrative and governance structure, the project should analyze the potential / feasibility of implementing partners against growing budget constraints (austerity policies) and subsequent impacts for technical implementation and counterpart contributions. This should be reflected in the risk section of the document and if necessary, include mitigation measures.
- German Development Cooperation has a long standing cooperation with key national implementing partners such as the Ministry of Agriculture and Rural Development (SADER), the National Forestry Commission (CONAFOR), the National Commission for Protected Natural Areas (CONANP), the Ministry of Environment and Natural Resources (SEMARNAT) and the National Commission on Biodiversity (CONABIO) in the field of sustainable land management, integrated landscape management, protected areas, sustainable ventures, biodiversity conservation and valuation of biodiversity and ecosystem services. Project results and lessons learnt from these experiences should therefore be considered.

✓ Switzerland Comments

Switzerland is supportive of the project. However, we identified some weakness and hope that these will be addressed in the further development and implementation of the project:

- Project Indicator 1:
  - 20% of SV Program sites implementing environmentally friendly territorial plans. We encourage to revisit this number as indicated in the agency response.
- Component 3 including several of the project indicator are somewhat weak, lack detail and/or ambition (e.g. Project Indicator 7: Added value generated by newly created social economy ventures (MXN)).
- Project Indicator 8: 50% of green businesses approved for financing through social banking alternatives

- It will be important to create synergies and links to the activities of national development banks (NAFIN, FIRA → e.g. Proinfor with KfW) and other national and local organization including CSOs (por ejemplo Grupo Ecologico Sierra Gorda)
- Moreover, while we understand the challenges posed by COVID19 we urge the agency to consult with local stakeholders (peasants and indigenous communities) nevertheless.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- How will the two projects in Mexico be coordinated given they're with two different implementing partners and in the same sector?
- Is the FAO confident that working with Sembrando Vida (SV) will, at minimum, deliver environmental benefits in the areas it will operate despite the programme's negative impacts, and if possible that Bienestar are signed up to apply learning and make changes more widely?
- The proposal aims to “only” work in a few geographies to try to improve the SV programme (Montes Azules, Huasteca, Durango). Will this be enough to achieve the programmatic shift required at national scale to provide reassurance SV does not have adverse impacts/effects?
- What are the assumptions/requirements to ensure this project will have positive transformational impact on SV as a whole?
- Is there reassurance/confidence that the responsible ministry for SV (Bienestar) will take on board the changes that may be recommended as a result of this project?

✓ **United States Comments**

- The outputs are framed in very soft language. In the next iteration of this proposal, we would like further development in the specific monitoring and evaluation outputs.

**17. Nicaragua: Sustainable Integrated Management of Biodiversity in the Indio-Maiz Biological Reserve, FAO, [GEF Project Financing: \$2,977,626] [GEF ID 10674]**

✓ **France Comments**

Specific attention:

- Regarding the project in Nicaragua, while recognizing the specific criteria and procedure of the GEF, coherence of the conditions of this project is needed with comments provided by members to the cofinancing project submitted to the GCF.

✓ **Germany Comments**

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

Germany welcomes the proposal to address the need of strengthened governance and landscape management to conserve biodiversity in the Indio-Maíz Biological Reserve (RBIM) in Nicaragua. We especially welcome the detailed Theory of Change. However, we also note that some of the project's activities and processes, such as the consultations of indigenous and afro-descendant communities and their independent and legitimate participation in the project governance and decision making process, are of a very delicate nature. Ensuring adequate oversight, transparency, inclusivity, financial management and governance of the project is therefore of crucial importance. We urge the GEF Secretariat in developing this project to closely coordinate with the GCF Secretariat to ensure compliance and coherence with the conditions the GCF Board adopted for the approval of its funding to this programmatic approach at its 27th Meeting.

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

- Coordination with the GCF Secretariat and compliance and coherence with the GCF Board conditions adopted for the associated GCF Bio-CLIMA project.
- Germany welcomes the drafting of a detailed action plan on stakeholder management. Given the critical feedback by civil society organizations to the associated GCF Bio-CLIMA project, we request that this action plan includes:
  - i. lessons learned from results of former consultation workshops with Rama and Kriol Indigenous Peoples, as well as REDD+ strategies,
  - ii. a targeted strategy to promote participation of indigenous and afro-descendant communities of all genders in the project's planning process, including dealing with project activities in religious sites.
  - iii. an outreach plan addressed at settler communities and private enterprises benefitting from encroachment into the buffer zone, as to limit the probability of sociopolitical conflicts. This should also be included in risk assessment and analysis (Section 5 of the PIF).
  - iv. Given the concerning human rights situation in Nicaragua, the action plan should also include a detailed, separate section on ensuring the effectiveness and transparency of the "free, prior, and informed consent (FPIC)" -process for indigenous/afro-descendent peoples.
- Civil Society organizations have pointed to the occurrence of illegal mining and settling activities in the area, that are not yet featured in the document. We request to include these potential risks in the risk assessment, and if necessary and possible, devise mitigation measures and/ or target project activities to reduce these risk factors (e.g. component 3 and theory of change).
- Germany recommends outreach activities with the Rama and Kriol Territorial Government (GTRK), as well as the territorial Governments of Greytown (San Juan de Nicaragua), Río Indio and Río Maíz to discuss synergies with the GTRK Action Plan on Protection and Sustainable Use of the Indio Maíz Biological Reserve. Many activities in terms of tourism, research and monitoring as well as mechanisms for biological conservation are well aligned with the project activities.

- Further, it should be considered if project activities could support the reactivation and strengthening of the joint management agreement of the protected areas between the territorial governments listed above and MARENA. There are synergies with regards to activities under Component 1, especially with regards to the training and coordination of rangers.
- We welcome the inclusion of a knowledge management strategy. We would recommend to include an additional section detailing learnings on GCF-GEF collaboration for other GEF agencies and focal points, detailing benefits and challenges in cooperation with the GEF-Secretariat.

✓ **Norway/Denmark Comments**

**General comments:**

- The objective of the project is to conserve the biodiversity and enhance the ecosystem services in the Indio-Maíz Biological Reserve (tropical forests). Different indigenous peoples groups live in this reserve. The right of Free, Prior and Informed Consent (FPIC) of indigenous peoples is recognized in the project proposal.
- It is positive that the GEF funding will complement the funding of the Green Climate Fund (GCF), and possible funding from the Forest Carbon Partnership Facility (FCPF). This GEF-7 and the project approved by the GCF will finance activities that implement the National REDD+ Strategy of Nicaragua. There is overlap between this project and the project approved by the GCF. Therefore, GEF may consider approving this project with similar conditions as the ones adopted in the GCF project.
- Currently, there are seven projects taking place in the Indio-Maiz reserve. These projects are financed by different organizations.

**Specific comments:**

- Overlap in the implementation area: The project approved by GCF will also be implemented, among others, in the Indio Mais Biological Reserve. There is overlap between different components of the GEF and the GCF projects. There is risk of double dipping/double funding. Overlap:
  - components 2 and 3 of the GCF project and outcome 1.1 of the GEF project;
  - component 2 of GCF and outcome 2.1 of GEF;
  - activity 1.1.1.4 of GCF and outcome 3.1 of GEF;
  - component 3 of GCF and component 3 of GEF;
  - output 3.3.1 of GCF and component 4 of GEF.
- Overlap in results and reporting: This GEF-7 project will generate: (i) more than 316,000 ha of terrestrial protected areas under improved management for conservation and sustainable use; and (ii) a reduction by 3.3 million tCO<sub>2</sub>e (GHG emissions avoided and removed between 2021-2025). The Bio-CLIMA project approved by the GCF will generate: (i) 541,826 ha of conserved natural forestland through sustainable forest management, and (ii) a reduction of 12.8 MtCO<sub>2</sub>e over seven years of project (2021-2027).

- One activity within the first component of the GCF project is to facilitate the celebration of forest conservation agreements between IPs and non-indigenous settlers. Several advisors questioned the appropriateness of this activity. If IPs are the owners of the territory, shouldn't the project enhance the capacity of IPs to claim their lands back instead of suggesting arrangements with non-indigenous settlers (activity 1.1.1.4 of the results framework)? The GCF project was adopted with this activity, but some conditions were drafted to ensure the proper consultation of IPs. The proposal submitted to the GEF includes a similar component. Therefore, GEF may consider including similar conditions to address this issue.
- When discussing the Bio-CLIMA project, some concern was expressed regarding the EEs capacity to execute the project properly. Some conditions were drafted to address this concern.
- The agreement with the FCPF for grant co-financing is planned to take place by the end of 2020. Therefore, the GCF Secretariat recommended that the disbursement of the GCF should take place after the FCPF co-financing FCPF was committed. GEF may consider a similar recommendation. Question to FAO on this regard: How will the project be affected if the signing of the Emission Reduction Program Agreement (ERPA) with the World Bank / FCPF does not materialize or take place later than December 2020?
- Overlap with other projects: Further information should be provided on how this GEF project is coordinated with the PAIPSAN and NICADAPTA project.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- As flagged in the GEF Council, we are aware that a related project FP146 in the GCF board was approved with conditions (particularly in relation to the programmes governance mechanisms), some of these resources are being used to co-finance this project. To ensure consistency and coherence between funding mechanisms we would like to ensure there are sufficient strong and robust assurances on safeguards – fiduciary, social, environmental in place in the project before it is endorsed by the CEO, so would like to see again before it is approved.
- The UK, like many of our international partners, has concerns regarding the potential misappropriation of programmes funding. Avoiding this is important. As a result, the UK puts great emphasis on ensuring programme spending is transparent, accountable and regularly audited. We would welcome further clarity on the programme's governance mechanisms covering how the GEF plans to: **1)** implement robust financial monitoring/oversight, **2)** ensure a clear and transparent funding stream, and **3)** whether there will be a mechanism to 'turn off' funding if needed. If the UK are satisfied that the appropriate structures are in place, we would support the project.
- The projects must ensure that the inclusion of indigenous groups is genuine and sustainable. A number NGOs and representatives from indigenous communities have questioned the engagement process to date (link here <https://redd-monitor.org/2020/01/12/nicaraguan-alliance-of-indigenous-and-afro-descendant-peoples->

[statement-of-concern-about-world-bank-redd-deal/](#)). Seeking reassurances that the process has been fair, open and under continual review is important.

- We would appreciate further clarification on how the GEF will ensure the ‘partnership with indigenous peoples and local communities’ is genuine.

✓ **United States Comments**

- The United States has serious concerns about the potential for successful, credible and effective implementation of this project. We are additionally concerned that project does not propose partnership with key organizations, including CANATUR, Nicaragua’s Chamber of Tourism, and Grupo Cocibolca. We have further concerns about the capacity of the main implementation partner, MARENA.

**18. Panama: Conservation of Biodiversity and Sustainable Development through Productive Innovation and Competitiveness of the Rural Sector, World Bank, [GEF Project Financing: \$3,505,936] [GEF ID 10709]**

✓ **Germany Comments**

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

- The project outline is currently lacking a detailed project description which specifies approaches and methods how to implement activities and achieve the objectives. 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 activities are to be carried out. This refers in particular to:
  - Component 1: How are governance structures being strengthened and how does the dissemination of knowledge relate to that? What kind of knowledge and to whom? We would like to request that, under this component, a strategy for the long-term retention of changed/strengthened governance structures is developed and implemented.
  - Component 2: Under this component, a lot of different kinds of investments, in multiple sectors and targeting different stakeholders seem to be planned. We would like to request that the project proponents reevaluate the feasibility of the planned investment strategy and specify in more detail what kind of investments are intended and where. In addition, this should include a strategy to ensure long-term sustainability of the intended investments (how is financial support guaranteed in the future?).
- Given the overall lack of information and detail in the project proposal, Germany would like to request that the proposal is substantially expanded and revised in terms of content and methodology.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- What measures will be established to ensure a more competitive rural sector doesn't threaten conservation efforts?

✓ **United States Comments**

- This proposal does not include risk management or mitigation measures, which should be included in the next phase of project development

**19. Philippines: Philippine Rise Integrated Conservation for Enduring Legacies through Ecosystem Support Services (PRICELESS), CI, [GEF Project Financing: \$3,662,844] [GEF ID 10568]**

✓ **Germany Comments**

Germany approves the following PIF 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 considers this to be an ambitious project, supporting necessary actions for the Philippines.
- Under component 1, the project proposal includes the preparation of a Republic Act or a draft legislative measure for consideration by the Philippine Congress. Considering the current political context in the country, it seems rather ambitious to achieve this during the project duration. We would therefore like to suggest that the project includes a strategy for following up on the legislative procedure even after the project has ended. This should also be reflected in the project's theory of change.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- How will the two projects in the Philippines be coordinated with two different delivery partners?

✓ **United States Comments**

- We recommend coordinating project activities with the Philippine Department of Foreign Affairs Maritime and Oceans Affairs Office to be aware of current sensitivities associated with research and unidentified vessels that visit the Philippine Rise without permission.
- We recommend expanded efforts to coordinate marine scientific research in association with this project, including engagement with additional local state universities and colleges, like the Aurora State College of Technology. The U.S. Embassy at Manila would welcome the opportunity to coordinate such efforts.



**20. Sao Tome and Principe: Improving Biodiversity Mainstreaming in the Agro-forestry and Fishery Sectors in São Tomé and Príncipe, IFAD, [GEF Project Financing: \$3,543,379] [GEF ID 10570]**

✓ **France Comments**

Coordination with other projects, for instance financed by the FFEM:

- Principe is one of the pilot islands in the SMILO project to help Principe becoming an island labeled as sustainable.

**21. Tanzania: Building the resilience of forest biodiversity to the threats of climate change in Tanzania's Nature Forest Reserves, UNDP, [GEF Project Financing: \$4,837,010] [GEF ID 10690]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Canada Comments**

- Canada views this project as one that seeks to strengthen the local operational capacities of nine high-risk, low-capacity NFRs to: (i) implement measures in response to the emerging threats to biodiversity as a result of climate change; and (ii) to test alternative income-generating opportunities that could help finance the continued implementation of these threat reduction measures in the targeted NFRs beyond the term of the GEF investment.
- The project is largely practical in its approach and has not been designed to develop and test innovative methods, but rather implement and scale up proven approaches that are new to the specified areas, which is a sensible approach. Canada would like to note that the STAP guideline document points to concerns over specified scientific/technical methodological issues, barriers, or omissions in the project concept which need to be addressed around climate change data and models that will be used, as an example. There may also be too much dependence on tourism and other funds that COVID-19 has proven are unreliable.

✓ **Germany Comments**

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

- Germany would like to acknowledge the relevance of the proposed objective and components and commends the inclusion of various government agencies to strengthen the implementation. Some suggestions:

- We would appreciate a more coherent, and durable strategy for knowledge-management. The modular structure of the program has potential to include learning experiences, however, the document is largely silent on lessons learned from other programs focusing on management of nature reserves or functioning reserves – it would be beneficial to program development to draw cross-references to similar initiatives both in Tanzania and adjoining countries like Kenya. This would also present an opportunity for South-South exchange and would increase potential for upscaling. This applies particularly for income generating activities which various donor-funded project have tried to develop.
- Private sector involvement (p. 44): the listed options seem to be rather a laundry list than prioritized alternatives with realistic potential. It would be beneficial to be more concrete and focused.
- We suggest to revise the projects steering structure: Senior Investors, i.e. GEF should be represented in the Investment Board. Similarly, including civil society observer in the steering structure could be beneficial.
- The program determines high risks regarding community involvement, the legal situation is unclear and needs more clarification. According to the document, there has not yet been any community consultation – feasibility/ general buy-in of communities should be proven before approval of the program.
- Observation: The rates of deforestation are estimated at 469,000 ha/annum – despite variation according to source this number very likely represents a large overestimation – Global Forest Watch estimates an average of about 150,000 ha per year for tree cover loss (which is usually higher than actual deforestation). This could be revised.

✓ *Norway/Denmark Comments*

**General comments:**

- The project can become an important contribution to reduced deforestation and forest degradation in these forests. The NFRs host a considerable proportion of biodiversity in Tanzania. Furthermore, sustainable forest management is part of the national draft NDC. The NDC has not yet been submitted to the UNFCCC.
- The proposal is deemed very relevant as Tanzania is currently promoting local tourism and in addition Tanzania Nature Forest Reserves have significant Fauna that need interventions to safeguard it from current climate change challenges.
- The proposal has a good description of the current situation, stakeholders and challenges in forest management (see also specific comments below).
- The proposal includes a good analysis of the challenges of managing the NFRs. This includes challenges with some of the planned income generating opportunities such as eco-tourism. There is minimal numbers of visitors/tourists in the NFRs in normal years, and not something that is occurring as a results of Covid19 only but that is exacerbated by travel restrictions due to COVID. Stakeholders such as TFS should assess the tourism potential – this could include looking at the potential of domestic tourism to NFRs.
- The approach of supporting response to climate induced threats to biodiversity (component one) combined with income generating opportunities to reduce threats to

deforestation (component two) seem to be a conducive approach. However, the role of local authorities particularly at district level to support income generating activities and their participation in reducing threats to biodiversity is missing. This role is important as also emphasized in the Participatory Forest Management policies in Tanzania.

- The importance of recognizing and improving local user rights should receive a higher focus in the project. The project plans may however benefit from being more explicit on the need for clarification of tenure and user rights in an around NFRs.

**Specific comments:**

- Regarding the context analysis, we would recommend that the project provide an analysis of the larger context of the different types of forests and management systems of forests in Tanzania. Examples would be participatory (or community) forest management systems that have existed for a long time – in community forests. It should be considered to include improving joint forest management, particularly for NFRs where the central and local governments agree with communities to jointly manage government owned forests. Joint management is provided for in the forest policy. Cost-benefit arrangements remain as the main barrier for joint management. Challenges in land-use planning and resource allocations for the management of NFRs vs community forests could also have been further elaborated on. Lack of regulatory frameworks and/or need for updating of these that take into account social and environmental rights of communities and safeguards could have been included. This would include delegation of responsibilities between government agencies in managing NFRs vs local government responsible for well-being of communities living adjacent to NFRs.
- The roles of key agencies in the implementation of the project are not well described in the proposal. The Vice President’s Office (VPO) is listed as the executing partner. This organization does not have field implementation capacity and will depend on the capacity of MNRT and TFS and other partners.
- More clarity is required on the VPO’s specific role in this project given its limited capacity and mandate under the Environment Act and why UNDP did not opt for Tanzania Forest Services as an executive partner.
- The proposal mentions a Technical Working Group, but the mandate and working modalities of the key stakeholders to the project are not described. The implementation arrangements should be elaborated more in detail than is the case in the PIF. There is ample room for conflicts, inefficiencies and lack of clarity of responsibilities in the project implementation as it is presented. This may jeopardize project results.
- One of the key stakeholders in the project, the Tanzanian Forest Services (TFS) Agency plays a key role in the management of the NFRs. TFS has strengthened its role in the past years, including receiving increased budget allocations through the national budget. TFS is by many (especially communities) perceived as a law enforcement agency. The integration of Human Rights issues and conservation is important in a context where communities have perceived or actual experiences of lack of respect for human rights in forest conservation efforts.
- TFS is administratively placed under MNRT, whereas VPO is the national implementing agency listed in the proposal. These are two different ministries. We recommend more

clarity to be made on the planned set-up of the programme management unit and coordination with relevant projects, agencies and organisations.

- There are some reservations of seeing UNDP being the programme holders of a forest biodiversity project as biodiversity is not within their core mandate in Tanzania, there would be other UN agencies that would be more relevant as programme holder. In general, the Danish embassy in Tanzania has informed us that they are not impressed by UNDP as an implementing partner seen in a Tanzanian context. This is built on the fact that they currently have cooperation with UNDP in two governance programmes and none of them are performing as expected. It would be pertinent to rather see UNDP focusing in on fewer areas instead of spreading to new areas where they may not have a comparative advantage.
- UNDP should be encouraged to take an active part in the donor group on environment and sub-group on forestry in order to ensure that they are actively engaging with relevant actors and issues in this thematic area and to enhance donor coordination.
- The proposal includes Tanzania Forest Fund (TaFF) as a partner. TaFF provide grants that supports management of forest project at national level. Some of these projects are implemented in the proposed areas and it will be useful for the proposed project to find synergies.
- It is very positive that the applicant has provided a list over initiatives that relate to sustainable forest management in Tanzania and the list demonstrates that there is potential for improved coordination and utilisation of synergies. To our knowledge, there are projects listed that have not yet secured financial support and others that have yet to be initiated. Norway has supported EAMCEF since 2011 and is aware that this funding is the only financing that EAMCEF receives, except from its endowment fund. The indicated figures for EAMCEF of annual budget of USD 2Mill are higher estimates than what may be realistic. It should be noted also that the current grant agreement with EAMCEF expires in 2020 and a new Grant Agreement is yet to be signed. EAMCEF has supported projects implemented by TFS as a contribution to implement Management Plans of NFRs, including development of ecotourism potentials in several NFRs. UNDP was one of the founding agencies behind EAMCEF when it was initiated and the idea of EAMCEF then was to establish an organisation supported by bilateral, multilateral donors together with the Government. Experience shows that government funding ended and EAMCEF has continued with bilateral donor funding only. It is important to ensure that this experience does not repeat itself with the proposed GEF funded project supporting TFS. It is important for the proposed project to aim for sustainability by ensuring future Government ownership and budgetary allocations for forest services such as TFS.
- Although the proposal has included relevant projects, there are some additional initiatives we would like to mention that are relevant to the planned project:
  - Tanzania has received support from the UN to develop a forest financing strategy – which will be part of the next national 5 year development plan. The forest financing strategy is still under development and should be highly relevant for the proposed project.

- Norway signed an agreement with Tanzania in July 2020 for support to the national coordination on REDD+ - where VPO is the implementing agency. TFS is represented in the project technical committee. The main objective of the project is increased coordination between government ministries in sustainable governance of forests with the aim of reduced emissions from deforestation and forest degradation.
- Sweden has signed an agreement with VPO for support to the National Environmental Management Council (NEMC), for development of regulations under the national Environmental Act.
- The total budget seems a bit blown-up, and the contributions in kind and in the form of public investments (e.g. from VPO, MNRT and TFS) seem to include regular budget allocations. These may not be specifically allocated to the work related to the 9 specific NFRs presented as project focus areas. For example, the figures listed in Table 1 for TFS budget allocations to all of the 17 NFRs are lower than the TFS project contribution listed in section C of the proposal. This may indicate a somewhat imprecise listing of partner contributions to the project in section C. This could pose complications in reporting from the project – will it be possible to report project relevant results based on all of these funds?

## CLIMATE CHANGE MITIGATION

### 22. China: Facilitating Cleaner and Energy Efficient Phosphate Chemicals Industry in China (PhosChemEE) Project, UNDP, [GEF Project Financing: \$ 9,845,662] [GEF ID 10722]

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

#### ✓ Germany Comments

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

- Outputs 1.1.1 and 1.1.2 are quite broad and multifaceted (formulation, recommendation, approving and enforcement of policy and institutional framework/implementing rules). It might be worthwhile breaking these outputs down into multiple ones.
- Output 3.2.3 could be complemented by or based on a critical evaluation of the management technologies in the phosphate chemicals industry applied in this project.
- Being not perfectly aware of the precise policy context and the detailed distribution of responsibilities among different ministries, it might be worthwhile to assess collaboration

with China's Ministry of Ecology and Environment, e.g. in the development of frameworks and safeguards for all three components.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- The project is providing technology to be a demo project. If this technology is successful, what's the strategy to support its uptake?
- What's the case for a GEF intervention here and how will the mines/plants be selected to receive support?

✓ **United States Comments**

- We would like to see in the next iteration of the proposal, a clearer statement that the participating enterprises will have to demonstrate good environmental and social management practices.
- We would like to see stronger engagement with ethnic minorities who live within the mining areas. These local, communities will be impacted by this work, and should be involved beyond the initial consulting stage.

**23. Pakistan: Combating Climate Change through the Promotion and Application of Sustainable Biomass Energy Technologies in Pakistan (PASBET), UNDP, [GEF Project Financing: \$3,439,041] [GEF ID 10720]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Germany Comments**

The proposal and its objectives are particularly relevant for Pakistan considering the current situation in the environmental (air pollution), energy (30% renewable energy by 2030) and climate change (20% less CO2 emissions by 2030) sector. However, the advancement of a technology sector (such as the promotion of biomass with USD 24 million) should be integrated into a national energy and climate strategy.

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

- Germany requests that the establishment of a policy and regulatory framework for sustainable woody biomass energy production and utilization is mentioned in component 1 and contributes to an overall integrated energy plan. This was already suggested by the

documents “Pakistan 2025 One Nation - One Vision” (“there is an urgent need to develop an integrated energy development plan”, May 2014) as well as in the “Renewable Readiness Assessment Pakistan” (April 2018) provided by IRENA. Recommended actions included the development and implementation of an integrated energy plan as well as setting of targets for renewable energies.

- We further request that additional indicators relating to the additionality of measures to achieve national renewable energy targets shall be added in project design, as well as in the M&E system.
- We request that the proposal should more clearly differentiate between agricultural waste and woody biomass, as there is an apparent confusion in the PIF. It appears that the PIF only prioritizes woody biomass. If this is indeed the focus, it should be better explained why, especially in the context of many reforestation projects in Pakistan at the moment. It appears very counterintuitive to focus on “the establishment, operation and maintenance of dedicated fuelwood lots or energy plantations”. Moreover, forest residues are of environmental value and should not be considered as waste products.
- Regarding air pollution, we request to outline the contribution, additionality, and theory of change of the projects measures in the Pakistani context in more detail. The statement that the issue of air pollution could be “eradicated” in Pakistan looks very ambitious. Therefore, it is important to answer the questions of “how” and “when”, especially if the project does not have a focus on agricultural waste.
- Further, the project design should include further information on cooperation, co-financing and additionality of measures, compared to other bilateral and multilateral donor projects, as well as national initiatives in the agriculture, public health and climate change sector.
- Especially the link to the new Pakistan NDC that is currently being developed, would be relevant. CO2 emissions cuts by this project, may be included in the new NDC.
- Regarding ownership and governance, Germany requests that the limited capacity/competence of the MoCC to manage such projects and coordinate so many different actors from different political levels is taken up as a major risk in the project design. Even if we understand that the MoCC is a FP of GEF, some mitigation solutions should be developed.

✓ *Norway/Denmark Comments*

- In support of the comments from the STAP Review about the need to justify why the project is only proposing biomass as an option for renewable energy it would be very pertinent to have an approach that ensure the promotion of biomass for energy does not negatively impact food security.
- The proposal does not seem to have addressed the issue of cultural preferences with regards to sources of energy for cooking and thus the need to be very focused and sensitive regarding activities focused on behaviour change.

✓ United States Comments

- This project is well considered given the need for reforestation, resource management, industry development, energy provision within the framework of green growth and CO2 reductions. Additionally, it fits in very well with previous intentions, policies, and existing projects. However, it needs of considerable investigation before it can support its financial and value chain sustainability.
- We would like to see further development on the policy and implementation plans, and additional information on resource availability and distribution channels.

**24. Senegal: Promoting cleantech innovation for climate action in Senegal, UNIDO, [GEF Project Financing: \$ 2,342,018] [GEF ID 10715]**

✓ Canada Comments

- Canada believes that clean tech plays a critical role in protecting the environment and addressing climate change. This project seeks to support Senegal to strengthen and connect the clean tech entrepreneurship ecosystem. Consultation with stakeholders and counterparts will allow for SMEs to define areas of focus for funding pertinent to the region that support current initiatives or tackle new ones. The project could be complementary to related environmental initiatives. Senegal is currently receiving financial and technical support to reduce emissions and encourage sustainable growth. As such, Canada does not see any reason to remove this project from the work program. Senegal provides opportunities for increased clean technology and environmentally conscious development. Canada would ask stakeholders to consider revising the funding model to support SMEs after scale up and deployment. Given the instability/unpredictability of markets during COVID-19, support for SMEs at the development stage will be beneficial but continued support to endure market uncertainty will be important for longevity.
- Canada would also like to ensure at the front end of project design that the distinct barriers faced by women are identified, key gender issues are addressed and presence or absence of women in the innovation ecosystem is documented. The lack of data availability and collection efforts in Senegal mentioned in the introduction in the PIF can be addressed by this project, by building the capacity of stakeholders to collect and understand the value of (disaggregated) data.
- Additionally, we believe there is a need to ensure a focus on results and impact that will last, such as new or strengthened business networks, strengthened links within and outside the ecosystem, improved and lasting access to credit options for small businesses including those led by women, change in attitudes towards women and youth in the sectors.
- Finally, Canada would like to consider a wider definition of innovation which encompasses the ways in which Senegalese women innovate, which may in some cases be overlooked for being “low-tech,” while their potential for scalability and impact may be great.



✓ **Germany Comments**

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

- Germany requests that indigenous peoples and local communities are included in project design and stakeholder management in a transparent and inclusive manner.
- Further, we request to provide detailed information about supported clean tech products and their additionality in the national context..
- Moreover, Germany requests that the barriers faced by cleantech SMEs in developing and scaling-up innovative cleantech solutions are specified by studies or concrete examples. Overall the barriers mentioned are very generic. It is for example not clear, what supportive policy is missing for the barrier “limited enabling policy and regulatory environment” or how the conclusion of the barrier “lack of public awareness” was reached.
- Further, the risk management section should also include the recently found petrol and gas reserves as a potential risk, as they might change political priorities in the energy sector. This could affect the project and should be evaluated in the project design.
- Germany would suggest to reference the LDPSE (Letter politique de Development du Secteur d’Energie) and its action plan for 2019-2023 in the baseline scenario.
- Germany also recommends to further engage with GIZ and KfW projects besides the GIZ project ICT4Agriculture that is already mentioned in the proposal. This would include amongst others the “Programme for sustainable energies”  
[https://www.giz.de/projektdaten/projects.action?request\\_locale=en\\_GB&pn=201522176](https://www.giz.de/projektdaten/projects.action?request_locale=en_GB&pn=201522176)

**25. Thailand: Accelerating the Adoption and Life-cycle Solutions to Electric Mobility in Thailand, UNIDO, [GEF Project Financing: \$ 2,913,465] [GEF ID 10681]**

✓ **Germany Comments**

Germany approves the following PIF 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 full proposal should lay out in more detail and referring to concrete suggestions how in particular the Project Outputs 1 and Outputs 2 are to be achieved. This should also be reflected in the project’s theory of change.
- More detail should be added on how the integration of electric mobility with the (renewable) energy system is to be achieved, taking into account main systemic shortcomings as well as potentials on both supply and demand side, i.e. with regard to electric vehicles (batterie and charging) state-of-the-practice technology capabilities as well as grid provision and management requirements.
- Financial and non-financial incentives created for uptake of electric public and private fleets (Output 1.1.3) should be further specified or exemplified as to the target group, policy design and scope of implementation.

- Framework for addressing life-cycle issues for electric mobility and sustainable use of batteries (Output 1.1.3) should be further specified or exemplified as to the underlying objectives and the methodological approach.
- With regard to electric mobility promotion additional policy alternatives could be taken into account to enhance the EV uptake through a gradual deterioration or disadvantage of ICE vehicles (“push policies”).
- Within the context of the Master Plan for Sustainable Transport System and Mitigation of Climate Change Impacts of the Thai government and the A-S-I approach adopted in transport policies it should be pointed out how the proposed project monitors can prevent non-intended negative impacts, such as increasing motorization rate due to EV uptake.
- With regard to the risks it could be analysed whether the strong role of biofuels in transport and climate policy may present any risk to the project goal.
- With regard to EV uptake in public transport it could be checked whether other modes and partners beyond cooperatives operating songthaews in Rayong could be included.

✓ **United States Comments**

- We are supportive of the aims of this project, but are concerned about the management strategies. There are many potential risks to the successful implementation of this proposal, and we are concerned that the level of risk mitigation does not adequately match the level of risk.
- Our domestic reviewers appreciate the acknowledgement of a potential lack of local capacity to execute the project according to the relevant UNIDO and GEF policies, and that could pose a risk to the success of the project. However, the sole recommendation of an external assessment did not seem like a sufficient response to this risk. Further development of these strategies would be welcome in the next iteration of this proposal.
- This project requires sufficient capacity to develop and scale renewable energy systems for charging infrastructure. These facilities and infrastructure take time to build, and the PIF does not satisfactorily address these needs and timelines.

## LAND DEGRADATION

### 26. Azerbaijan: Towards a Land Degradation-Neutral Azerbaijan, FAO, [GEF Project Financing: \$ 2,091,781] [GEFID 10708]

✓ **Germany Comments**

Germany welcomes the proposal which has a concise aim to define Land Degradation Neutrality baseline and targets and is accompanied by a comprehensive and concise implementation strategy.

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

- The Regional Environmental Centre for the Caucasus (RECC) is an important non-governmental stakeholder that carries out projects to combat land degradation, financed

inter alia by the European Commission and the GEF. Germany requests to include the RECC as a stakeholder to consult with and use existing synergies.

- With view to the assessment of the current natural capital and ecosystem services using the ELD approach (output 2.1.1), Germany recommends contacting the Secretariat of the ELD initiative to make best use of existing material and established procedures, e.g. for the trainings.
- While the ECOserve project (GIZ/Ministry of Agriculture) is mentioned and it is planned to use lessons learned and collected data, Germany emphasizes the need for close collaboration given multiple existing synergies such as the ongoing setup of a MRV system for environmental indicators that could be supplemented.

✓ **Switzerland Comments**

- Switzerland is supportive of the project.
- We appreciate the thorough project proposal and welcome the indicated share of co-financing. We encourage that the level of co-financing should be verified during project implementation in particular because it is primarily indicated in in-kind contributions.
- We also welcome the involvement of the private sector (i.e. MoU with Azersun) and encourage to strengthen this part during the further development and implementation of the project.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- We understand this project is not implemented in the newly liberated territories.
- Our concern is about the staff capacity in the Ministry of Ecology to support this project given that the potential attention in exploring opportunities in the newly liberated territories.

**27. Bahamas: Integrated Landscape Management for Addressing Land Degradation, Food Security and Climate Resilience Challenges in The Bahamas, UNEP, [GEF Project Financing: \$5,329,452] [GEF ID 10694]**

✓ **Germany Comments**

Germany welcomes the proposal of integrated landscape management approach under the framework of land degradation neutrality (LDN) and acknowledges the broad stakeholder engagement that has already taken place, the consideration of land rights as well as the link to international networks and programmes, e.g. WOCAT, trends.earth, and TEEB.

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

- Ensure that the respective Ministry, institutions, and private investors responsible for conversion of productive agricultural lands into commercial and residential uses are

actively involved in the project as important actors regarding trade-offs between environmental and development goals.

- Develop a comprehensive Capacity Development and Knowledge Management Strategy as a basis for long-term institutional learning and behavioral change. This should also be reflected in the theory of change.
- Refer to and use international key documents and guidelines, especially Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT); soil sampling according to internationally agreed standards and guidelines under FAO and UNCCD.
- Link to specialized ongoing global initiatives, especially to: the LDN Initiative of the Group on Earth Observations (GEO-LDN) and the new FAO Task Force on Restoration (for addressing trade-off analysis as well as the existing gap between on-the ground monitoring of restoration or SLM measures and national reporting network); consider applying the Economics of Land Degradation (ELD) 6+1 approach to communicate economic benefits of investing in SLM (to deal with the risk of limited policy buy-in); consider linking IICA's AgriEx App with mobile apps for citizen science like the Land Potential Knowledge System (LandPKS).
- Clarify the proposal's targets of 10,000 ha or 20,000 ha (both numbers are mentioned).

**28. Lesotho: Regeneration of Livelihoods and Landscapes (ROLL) Project, IFAD, [GEF Project Financing: \$ 3,515,982] [GEF ID 10723]**

✓ **Germany Comments**

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

- The proposal should provide more detail on how the project is going to address the issue of governance and management of natural resources in Lesotho. Particular focus should also be given to better coordination between relevant ministries. This should also be reflected in the section on risk management.
- Germany welcomes that this proposal aims at enhancing the enabling environment. However, Germany invites the applications to elaborate in more detail on how this will be achieved (making use of UNCCD's dimensions of an enabling environment), especially in the context of land tenure rights, which the project rightly identified as a major challenge. Generally, Germany welcomes the explicit focus on LDN.
- As highlighted in the proposal, the EU and BMZ (with GIZ as implementing agency) support a national programme for Integrated Catchment Management (ICM) in Lesotho since 2020. Six national ministries are involved and the programme is being implemented under an inter-ministerial coordinating mechanism. There is a lot of overlap between the goals of this proposal and the ICM (e.g. avoiding soil erosion, protection of key ecosystems while also strengthening livelihoods and resilience in rural areas). We suggest close collaboration between the two projects.
- In its current stage and with the Ministry of Forestry, Range and Soil Conservation being one of the implementing agencies, there is a risk that the proposed project will not make

use of the inter-ministerial coordinating mechanism. Germany invites the applicants to make use of the existing synergies and to elaborate in more detail on how it intends to do that in the proposal. Germany further suggests using the proposal to strengthen the role of the Ministry of Forestry, Range and Soil Conservation within the national ICM Programme.

- This proposal should focus on increasing the national coordination for the management of natural resources, for instance by including binding contributions to Lesotho's national catchment management targets, or by contributing to the development of national guidelines for integrated catchment management. Overall, the proposed project implementation should be closely aligned to the implementation of the ICM.

**29. Pakistan: Combating Land Degradation through Integrated and Sustainable Range and Livestock Management to Promote Resilient Livelihoods in Northern Punjab, FAO, [GEF Project Financing: \$2,183,105] [GEF ID 10693]**

✓ ***Germany Comments***

Considering the environmental and socio-economic conditions in the Northern Punjab region of Pakistan, combating land degradation through sustainable and integrated rangeland and livestock management becomes pivotal. Germany welcomes this project proposal, because there are no other relatable projects which cover the issues of rangeland restoration through effective livestock management.

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

- Nevertheless, to develop and successfully execute inter-sectoral policies and regulations, it is crucial to specify and convince all relevant stakeholders in this field. Germany therefore requests to specify all stakeholders to fully clear their commitment to the project. Germany suggests depicting how exactly the community will be engaged in livestock management in order to become the main driver of change.
- Additionally, Germany suggests specifying the local actors (NGO, CSO, grazier organizations, local businesses etc.) to better focus on local participation.
- Germany requests to include key companies in the stakeholder analysis to support private sector involvement to improve existing value chains around livestock produce.
- Germany further suggests, to additionally involve the 'Ministry of Planning, Development and Special Initiatives' as the overall project is focused on planning processes. To reduce pressure on rangeland resources, expanded stall feeding is considered a solution. However, newly arising challenges from solutions, e.g. nitrogen accumulation, should be taken into consideration.
- Finally, global benefits for Pakistan in terms of climate change appear rather limited according to their presentation. In terms of mitigation, the benefits are marginal compared to the national projections (a share should be displayed, either based on a sectoral approach or on a provincial approach). The main benefits are in terms of adaptation; thus, it should be defined how newly restored land will benefit the overall climate change objectives of Pakistan.

## CHEMICALS AND WASTE

### 30. Global (Albania, Burkina Faso, India, Montenegro, Uganda): Phasing Out Mercury Measuring Devices in Healthcare, UNEP, [GEF Project Financing: \$7,980,000] [GEF ID 10716]

#### ✓ Canada Comments

- This project is in line with the Minamata Convention text and Canada supports this project in principle, but we believe that the project could be strengthened by further developing the specifics for each of the proponent countries. For example, there should be an expanded discussion on barriers in transitioning to mercury-free measuring devices each project area, particularly on policy/regulatory barriers and strategies to change consumer purchasing behaviour. Additionally, more specific information on the proposed project implementation activities in each country would be helpful.
- Canada appreciates the coordination with GEF project 10349 “Demonstration of production phase-out of mercury-containing medical thermometers and sphygmomanometers and promoting the application of mercury-free alternatives in medical facilities in China” to share experiences and early lessons learned.

#### ✓ Germany Comments

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

Germany fully supports the proposal, it has great potential to reduce the mercury use in healthcare devices in the target countries in accordance with the Minamata Convention.

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

- In some instances, facts about Armenia are still mentioned in the proposal. at two points, although it was replaced by Albania. E.g. in the description of the regulatory context, no information on Albania is provided as the information given still relates to the Armenian context.
- Please explain why five countries in a broad and heterogenous geographic area, from 3 continents and characterized by distinct in economic and social compositions were selected, instead of focusing on a specific region.

#### ✓ United Kingdom Comments

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- It is not clear how countries other than India are involved in this.

### 31. China: Green Production and Sustainable Development in Secondary Aluminum, Lead, Zinc and Lithium Sectors in China, UNDP, [GEF Project Financing: \$15,750,000] [GEF ID 10673]

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval.*

*This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **France Comments**

Coordination with other projects, for instance financed by the FFEM:

- Interesting subject and ambitious project. But the theory of change must be developed, green technologies must be better presented, the engagement by the private sector - which co-finances this project – must be more detailed, and activities aimed at ensuring sustainability and encouraging replication by other companies must be specified.

✓ **Germany Comments**

Germany approves the following PIF in the work program, it has great potential to clean Chinas' aluminum, lead, zinc and lithium sectors.

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

- In F) Global Environmental Benefits, under 60., please specify if and how the project will contribute to the international agenda on sound management of chemicals (e.g. Stockholm, Minamata, Rotterdam conventions, Strategic Approach to International Chemicals Management (SAICM))
- Concerning outputs 2.1.3 and 2.2.2 please specify the scale of the demonstration projects, how they are selected and how it is ensured that they will be effective during the timeframe of the project.
- Concerning the risks caused by COVID-19, the mentioned mitigation measures seem insufficient to reducing the risk and impact from high to low. E.g. they do not consider additional economic pressure on private actors (which might lead to lower commitment)

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- Why will only one enterprise be selected before CEO endorsement and not the full two that are planned to be worked with?

**32. Ethiopia: Promotion of Circular Economy in the Textile and Garment Sector through the Sustainable Management of Chemicals and Waste in Ethiopia, UNIDO, [GEF Project Financing: \$3,000,000] [GEF ID 10683]**

✓ **France Comments**

Coordination with other projects, for instance financed by the FFEM:

- Although indicating circular economy as an objective, the project seems to focus on downstream activities. Treatment at source is still necessary.

✓ **Germany Comments**

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

Germany welcomes this proposal, which aims at strengthening the sound management of industrial chemicals and their wastes, hence promoting a transition towards a circular economy.

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

- Please explain whether compliance with social safeguards and employment standards was taken into account in the pre-selection of sites for the pilot demonstration.
- Concerning the risks mentioned:
  - Please specify in greater detail what type of mechanisms will be established to cope with the lack of technical capacity from both public servants and technicians of the private sector.
  - If economic recovery funds are provided to participating companies to prevent that they are not able to meet their financing obligations; how will it be ensured that the recovery funds do not constitute the main (short-term) motivation to participate for those companies?

✓ **Norway/Denmark Comments**

**General comments:**

- We support this project, which looks to increase the circularity along the entire textiles and garment sector.
- We commend that this project is supporting and in line with the Ethiopian government's Green Manufacturing strategy which aims to promote circular economy through creating new green industries and greening of existing industries.
- We appreciate the approach to address, as a major component of the project, the phasing-out of PFOS. The project description sets out how the phasing-out will be able to deliver non-toxic, recyclable textiles and thereby also reduce the amount of textiles containing perfluorinated compounds going to landfills.
- The project will benefit from the proposed gap analyses of legal frameworks and institutional capacities in Ethiopia. This will provide a sound overview of key areas to prioritize, enable targeted revisions and establish a framework to guide implementation of other components.
- The described project seems to incorporate many important elements of the value chains, and the focus on chemicals management is important.
- The focus on transparency in the development of national databases and data collection systems is crucial in order to scale up impact. While measures have been identified to incentivize user engagement, it is important to continuously monitor engagement over time to maintain data quality.



- The partnership with the private sector will ensure a high potential for the sustainability of this project.
- We are pleased to see the project will include a sustainability assessment and development strategy in order to explore opportunities for scaling up impact.
- We find the multi-stakeholder approach key for the project's implementation.
- 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.
- This and similar projects have the potential to showcase a circular approach to a non-toxic material cycle which can be scaled up and implemented elsewhere.

**Specific comments:**

- An earlier project in Bangladesh (10523) intended to address also other chemicals of concern (as identified in a private labeling scheme and potential PFAS). If this project intends to phase out only Stockholm POPs we would question why it doesn't go as far as the Bangladesh project. This project proposal should also be clear how it will coordinate and collaborate with the other similar GEF projects referred to in the proposal.
- We find it particularly interesting that the project will engage renowned international brands and use BAT/BEP but this could be more clearly spelled out with reference to how far this has already been addressed with the specific companies. However, we do not find information on which BAT/BEP that will be used. These may differ from one jurisdiction to the other but will usually require more advanced practices than only avoiding Stockholm Convention POPs. The earlier project in Bangladesh intended to use ecolabels, but that would usually be more demanding than BAT/BEPs.

**33. Panama: Environmentally Sound Management of Hazardous Wastes Containing POPs and Mercury, UNDP, [GEF Project Financing: \$ 2,730,000] [GEF ID 10721]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Canada Comments**

- Canada agrees with the findings and recommendations of the STAP review. We note that projects 10721, 10682, and 10419 have many of the same objectives and are close in proximity and therefore suggest that there should be some degree of collaboration between these projects to share experiences and best practices. Additionally, there may be

some knowledge or lessons learned gained under previous GEF projects in Argentina (10094) and Colombia (6928) that could be applicable to these projects.

✓ **Germany Comments**

Germany welcomes this proposal, which supports the implementation of the Stockholm and Minamata conventions in Panama

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

- Component 1, Output A2: Please specify how a clear mechanism of enforcement at national scale will be established, given the limited resources for this component (and probably implications for various stakeholder groups). What form of stakeholder engagement is planned in order to reach this output?
- Concerning the mentioned risks:
  - Risk 6: Please specify, what implications the mentioned development of “innovative virtual and remote methods for working and implementation” would have for the project’s success. Could everything go rather unchanged? Or would outputs potentially need to be adjusted, timelines shifted, and budgets raised to meet the expected outcomes?

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- 10721, 10682, and 10419 look very similar, but with 2 different implementing partners - what's the plan to coordinate?

**34. Paraguay: POPs and Mercury-free Solutions for Environmentally Sound Waste Management in Paraguay, UNIDO, [GEF Project Financing: \$4,000,000] [GEF ID 10682]**

✓ **Canada Comments**

- Canada agrees with the findings and recommendations of the STAP review, however, there are some additional areas of the proposal that may require further elaboration and consideration. In particular:
  - For output 1.1.1, there may be some misunderstanding of the intersessional work being undertaken by the secretariat. We recommend that the proponents review the programme of intersessional work under the Minamata Convention and contact its Secretariat to ensure the intersessional work is accurately reflected in the project proposal.
  - For output 2.1.2, Canada suggests that the proponents may wish to consider the existing technical guidance on managing hazardous waste under the Basel Convention as well as the Stockholm Convention’s BAT/BEP documents.
- Projects 10721, 10682, and 10419 have many of the same objectives and are close in proximity. Canada suggests that there should be some degree of collaboration between these projects to share experiences and best practices. Additionally, there may be some

knowledge or lessons learned gained under previous GEF projects in Argentina (10094) and Colombia (6928) that could be applicable to these projects.

✓ **Germany Comments**

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

This is a straightforward designed project addressing the implementation of the Stockholm and Minamata conventions in Paraguay. It is well designed, only one minor comment at this point.

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

- Please refer explicitly to how this project can be aligned with the Strategic Approach to International Chemicals Management (SAICM) and its priorities.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- 10721, 10682, and 10419 look very similar, but with 2 different implementing partners - what's the plan to coordinate?

**35. Peru: Environmentally Sound Management of PCBs, Mercury and Other Toxic Chemicals in Peru, UNDP, [GEF Project Financing: \$ 4,725,000] [GEF ID 10419]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Canada Comments**

- Canada supports this project as it is in line with previously adopted Stockholm COP decisions and proposed actions to the GEF in the 2018-2022 priority areas. The project is in line with the Minamata Convention text and will assist Peru with its treaty implementation.
- There are however, some aspects of the proposal that would benefit from further elaboration/development. For example, the barriers identified in the project could be expanded, particularly with regard to mercury. Political/regulatory barriers should also be considered. Canada agrees with the findings and recommendations from the STAP review.
- Projects 10721, 10682, and 10419 have many of the same objectives and are close in proximity. Canada suggests that there should be some degree of collaboration between these projects to share experiences and best practices. Additionally, there may be some

knowledge or lessons learned gained under previous GEF projects in Argentina (10094) and Colombia (6928) that could be applicable to these projects.

✓ **Germany Comments**

Germany welcomes this proposal, which supports the implementation of the Stockholm and Minamata conventions in Peru.

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

- Component 3 might be linked/might benefit from mutual knowledge exchange with GEF-Project 10716 which has a similar aim and collaborates with five pilot countries.
- Please specify Output B1: What intervention is planned? What scale will the pilot communication have?
- Concerning the mentioned risks:
  - Risk 4: Please specify, what implications the mentioned development of “innovative virtual and remote methods for working and implementation” would have for the project’s success. Could everything go rather unchanged? Or would outputs potentially need to be adjusted, timelines shifted, and budgets raised to meet the expected outcomes?
  - Risk 4: Due to COVID-19, health care sector officials and hospitals might be absorbed by dealing with the effects of the crisis and less willing or capable to promote actions concerning the use of mercury. Does this pose an additional risk to your activities? If yes, how will it be addressed?

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- 10721, 10682, and 10419 look very similar, but with 2 different implementing partners - what's the plan to coordinate?

✓ **United States Comments**

- We welcome this project, particularly as there will likely be increasing pressure in the ASGM sector as the Peruvian economy reopens after the COVID-19 pandemic. We believe the project would benefit from enhanced coordination efforts with domestic, indigenous, and international organizations, including USAID.

**36. Philippines: Reduction of POPs and UOPs through Integrated Sound Management of Chemicals, UNDP, [GEF Project Financing: \$ 6,562,500] [GEF ID 10686]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being*

*completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Germany Comments**

Germany welcomes this proposal, which addresses the implementation of the Stockholm convention and enhancement of an integrated sound management of chemicals in the Philippines.

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

- Please refer explicitly to how this project can be aligned with the Strategic Approach to International Chemicals Management (SAICM) and its priorities. What potential does it hold to be upscaled/expanded to also meet general targets of SAICM and its post-2020 objectives?
- Concerning the financing mechanism FREEME:
  - Please describe what experiences have been made with financing mechanisms similar to FREEME
  - Please describe what potential FREEME holds to be upscaled. Either to other sectors or as a general financing instrument of sustainable chemistry in developing countries, e.g. under the future implementation of SAICM.

✓ **United States Comments**

- Indigenous communities are often located in or adjacent to mining areas. We recommend proactive consultation and collaboration with such communities, even if individuals from those communities are not explicitly working within the supply chain of ASGM production.
- We recommend a positive messaging strategy about the benefits of the chemical greening initiative, particularly in light of recent killings and harassment of environmental defenders associated with ASGM reform.

## **INTERNATIONAL WATERS**

### **37. Regional (Algeria, Lebanon, Morocco, Montenegro, Tunisia): Build a Blue and Stronger Mediterranean, through the Mediterranean Network of Effective and Sustainable MPAs, CI, [GEF Project Financing: \$5,000,000] [GEF ID 10685]**

✓ **France Comments**

Coordination with other projects, for instance financed by the FFEM:

- Project presented and supported jointly by MedFUND (financed by FFEM and AFD) and MedPAN (which FFEM has been helping to organize for more than ten years).

✓ **Germany Comments**

Germany appreciates the proposal to build back a blue and stronger Mediterranean, which supports the Barcelona Convention and builds on existing projects in the region

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

- We request to revise the Theory of Change as to adequately demonstrate the effectiveness of programme activities in terms of impacts, e.g. successful accomplishment of project indicators in terms of overfishing and degradation of marine ecosystems. The main activity is the investment in the MedFund to generate revenues for further grants. From the ToC it is not clear how the programme will improve the main global environmental problems such as decline of biodiversity, decline in fisheries and degradation of coastal ecosystems and loss of related services.
- To do so, both the ToC and indicators should be revised to clarify how the programme will reach the core indicators of 612,000 ha of MPA under new or improved management. Also, a well evidenced sound reasoning needs to be provided to show how project activities will impact the core global environmental problems such as decline of biodiversity and fisheries, degradation of coastal ecosystems and loss of its services can be efficiently addressed.
- Lastly, we would like to stress that setting-up an M&E system should not be an outcome on its own. Please revise Component 4 and its outputs and provide further information on how the impacts of the programme's will be measured, including relevant baseline indicators. This revision should also include a detailed strategy on knowledge management to improve the sustainability and durability of project outcomes.

✓ Switzerland Comments

- This GEF proposal is of great importance considering that the question of Marine Protected Areas (MPA) does not meet the necessary priority by the concerned Governments. However, it is not clear from the proposal how the project is complementary with other similar initiatives (e.g. by UNEP) nor to what extent the concerned countries are adhering to the project. Please further clarify this in the course of the project preparation.

**38. Regional (Angola,Namibia): Enhanced Water Security and Community Resilience in the Adjacent Cuvelai and Kunene Transboundary River Basins, UNDP, [GEF Project Financing: \$ 11,167,890][GEF ID 10565]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ Germany Comments

Germany welcomes the proposal, as it is in line with German development cooperation support for the newly starting cooperation with CUVECOM. Germany invites the project to coordinate closely with the project implementing units from GIZ, KfW and BGR in the region. Some references in the PIF do not fully reflect the current relations between Germany and CUVECOM.

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

- **BGR-CUVECOM:** Kindly note that with respect to groundwater, **CUVECOM is in consultation with Germany** for a technical cooperation support for transboundary groundwater resources in the Cuvelai-Etосha Basin through BGR on behalf of BMZ, which will start shortly. Please revise all notes that already confirm this cooperation on p. 27, para 2; p. 33, para 4; p. 42, para 3 and 4; p. 53, para 3; p. 57, endnote [2].
- Detailed suggestions for the revisions are available and can be shared upon request.
- Germany requests that UNDP and implementing partners are closely consulting with BGR and CUVECOM on all groundwater-related components during the design of the final project proposal.
- **GIZ-CUVECOM:** Kindly note that GIZ on behalf of BMZ is not planning to continue its direct support to CUVECOM. Please revise p. 53, para 3. Nevertheless, cooperation with RBOs and the SADC Water Division in the GIZ-SADC Transboundary Water Management programme will continue and provide potential for cooperation with this project proposal.
- Germany appreciates that the proposed project builds on the existing IWRM plan for CUVECOM and is in consistency with regional priorities. Germany would like to request that the link to priorities identified in the Regional Strategic Action Programme (RSAP) on Integrated Water Resources Development and Management within the SADC region as well as the link to the current IWRM plan of CUVECOM is made more explicit under 7. “Consistency with national priorities”.
- We further propose the following suggestions for improvements:
  - **Output 3.3:** Germany kindly asks that the assessment of relevant regional and international legislation, policies, strategies and plans should be included in this output, in particular in relation to SADC policies, strategies and plans and to international water law.
  - Germany would like to stress that concrete activities to incorporate the **project M&E** into the (future) RBOs’ M&E need to be planned and budgeted. Attention should be given to not setting up a parallel M&E. M&E capacities of the two RBO need to be enhanced. Such activities should be incorporated in component 1 and 2.
  - **Output 4.2 & 4.3:** Germany asks that the risk of staff fluctuation should be addressed and a concept on how to ensure sustainability of technical capacity on the institutional level and not only on individual level should be included in the concept.

- Germany supports the need for improved **forecasting** and **real-time warning systems**. The activities leading to 1.4 should link to regional efforts in harmonization of meteorological forecasting / flood and drought forecasting (e.g. HYCOS). Attention to data and technology coherence should be given. Learning from previously set up flood early warning systems in the region should take place: e.g. the SADC Water Division pilot in Mozambique.
- Germany welcomes that the **stakeholder involvement, community-driven activities** and **gender mainstreaming** approaches will be taken.
  - The identified gap on stakeholder involvement should however be prominently addressed in all components and not only on the community level (component 5). Consultations with indigenous People and local communities in the basins, CSOs, Private Sector entities should take place at a very early stage and a potential review of the projects focus shall be supported.
  - The developed capacities in communities should not remain on the individual level (staff that accompanies the pilots) but also include institutional structures, strategies or agreements that are developed in this regard.
- The involvement of the national Gender Focal Point structure of SADC Water Division should be considered.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- The UK would like clarity on what the project will do. It sounds like it is focusing on governance, planning, and some aspects of restoring land, is this correct?

✓ **United States Comments**

- We would like to see further inclusion of indigenous people in this project, particularly the San communities in the Cuvelai river basin and the Himba in the Kunene basin.
- This project might consider partnering with local celebrities and influencers to promote project materials in addition to the outlined outreach campaign.

**39. Regional (Ecuador, Peru): Implementation of the Strategic Action Programmes and the National Strategic Action Plans for the Integrated Water Resources Management in the Puyango-Tumbes, Catamayo-Chira and Zarumilla Transboundary Aquifers and River Basins, UNDP, [GEF Project Financing: \$8,000,000] [GEF ID 10700]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party*



*review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Germany Comments**

Germany welcomes the project proposal on supporting the implementation and further advancement of IWRM in above basins.

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

- The full proposal should clearly identify how the development and implementation of a binational information platform for water resources management (output 4.2) will be set up, what kind of institutional structure is envisaged, and how this structure will ensure long-term operability regarding the required information services.
- Germany recommends to take into consideration Peru's experience with the Water Resources Observatory of the Chillón, Rímac, Lurín basins (Lima) that was implemented by the National Water Authority of Peru (ANA) and supported by the German government.

**40. Regional (Fiji, Indonesia, Madagascar, Philippines, Solomon Islands, Tanzania): Reefs, Resilient Communities, WWF-US, [GEF Project Financing: \$7,000,000] [GEF ID 10575]**

✓ **Germany Comments**

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

Germany welcomes the proposal to build capacity and solutions to ensure the long-term survival of coral reefs that are comparably resilient to climate change but exposed to urgent local threats. The global scope and the selection of sites based on transparent scientific criteria are commendable. Since the project focuses on local impacts on coral reefs, the involvement of local communities is particularly important.

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

- Germany suggests to include members of the communities dependent on coral reefs in the peer-to-peer learning events planned as project output 1.1.1.
- Large parts of the project concentrate on knowledge generation and exchange. Germany would like to point out that the changes in behavior that are necessary in order to reduce the negative effects on coral reefs on site are probably also linked to deep-seated values, beliefs and practices within local communities. Germany suggests to include the consideration of such socio-cultural aspects under outcome 2.2.
- Germany suggests to add thoughts on local ownership to the section on "Institutional Sustainability".

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- The summary paragraph doesn't say what the project will do. This is a relatively small amount of money when split over six countries plus a global component. It is unclear what "scalable solutions" the project will showcase.

✓ **United States Comments**

- We recommend potential collaboration with Dr. Al Licuanan of De La Salle University on the use of citizen science to monitor coral reef status and conditions.
- We are concerned the Philipian Department of Environment and Natural Resources (DENR) is listed as TBC as an executing partner. We would like to see confirmation of that partnership in the next stage of this proposal.
- This proposal includes a number of excellent institutional and CSO partners. We think it would be advantageous to see these CSO partners further engage with smaller, local organizations to build stronger community engagement.
- Ships in the Sulu-Celebes Sea are at risk of piracy and armed robbery. We recommend the development of a risk-management strategy for any vessels entering that area.

**41. Regional (Fiji, Solomon Islands, Vanuatu): Enhancing Water-Food Security and Climate Resilience in Volcanic Island Countries of the Pacific, FAO, [GEF Project Financing: \$6,000,000] [GEF ID 10712]**

✓ **Germany Comments**

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

Germany approves this proposal, which aims to enhance water and food security and climate resilience, sustain ecosystem services, and relieve pressure on over-exploited coastal aquifers by assessing the role of volcanic aquifers and by introducing sound groundwater governance frameworks.

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

- Urbanization has been identified as a main factor of natural resource degradation in the project area. The proposal could provide more details, however, on how the absolute population increase in Melanesia challenges the implementation logic.
- The cooperation of FAO and SPC seems very worthwhile considering their extent of regional and country experience. The involvement of other stakeholders, such as the civil society (as described in Component 2, (iii)) could be explicated furtherly, e.g. the suggested consultative participatory process.

✓ **United States Comments**

- We recommend collaboration with USAID's Pacific American Fund in this region.

- We also recommend greater clarity at the next phase of project development on whether the feasibility studies for groundwater will be in large towns / higher population islands, or will it focus on small islands and towns.
- We further recommend greater clarity and a justification at the next phase of project development on why this project is not focused on spring water development? Spring water, although smaller in volumes, is a significant and largely under-developed resource for remote communities. It is significantly less costly and easier to manage than boreholes. These are especially abundant in Vanuatu, Solomon Islands and Fiji.
- There have been failed borehole development projects in other regions of the world. How will this project build off of those projects to ensure success?

**42. Regional (Guinea, Guinea-Bissau): Integrated Natural and Water Resources Management Project in the Corubal River Basin, IUCN, [GEF Project Financing: \$ 6,300,000] [GEF ID 10508]**

✓ **Germany Comments**

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

Germany welcomes the project proposal on supporting the advancement of transboundary water resources management in the Corubal basin.

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

- Germany recognises the risk assessment of diplomatic and political conflicts as high and suggests to elaborate further on the mitigation measures for the facilitation of a successful multi stakeholder dialogue, particularly regarding the ongoing tensions between the presidents Condé and Umballo.
- The success of the project would benefit from a strong ownership from partners in both countries, as well as the regional institution Organisation de Mise en Valeur du Fleuve Gambie (OMVG). Further, the involvement of riparian communities in project design, implementation and monitoring is regarded as crucial. Incentives, shared understanding, as well as tangible benefits for local communities are necessary for long term participation.
- Sustainable forestry in partnership with communities in the entire basin is indispensable for permanent water availability and therefore project sustainability.
- Impacts resulting from of potential future dam construction in Guinée-Bissau could be addressed in component 1 of the proposal with a feasibility study for social and environmental compatibility for such infrastructure projects.

**43. Regional (Indonesia, Timor Leste): Management of Indonesian and Timor-Leste Transboundary Watersheds (MITLTW), CI, [GEF Project Financing: \$ 4,999,541] [GEF ID 10679]**

✓ **Germany Comments**

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

Germany approves this proposal, which aims to enhance joint watershed management as well as food, water and livelihood security for communities in the Loes/Mota Masin drainage system (crossing the borders between Indonesia and Timor-Leste).

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

- Germany appreciates the detailed description of outputs to support the outcomes. However, Germany would like to point out some discrepancies between the formulation of outputs in the main text (Part II: Project Justification) and in Part I: Project Information – Section B) that should be addressed (e.g. In Part II, Output 2.2.4 reads “SAP and SAP sub-plans endorsed by the necessary agencies” In Part I, Output 2.2.4 reads “SAP and SAP sub-plans endorsed at Ministerial level”).
- Germany would like to suggest testing some best practices and findings from previous CSDA activities (e.g. within management plan) already at an earlier project stage. Such field testing in all dimensions could start early during project implementation on a trial basis. Findings could be used to inform the formulation of the SAP/SAP sub-plans.
- Germany would like to underline that activities building on existing efforts of both countries in the field of climate change (e.g. as part of climate change adaptation strategies) should always be aligned to existing national climate strategies and policies. Furthermore, respective line ministries and governmental agencies should be consulted during the project implementation phase, where appropriate

✓ **United States Comments**

- We would like to suggest the additional consideration of a mechanism, such as Payment for Environment Service (PES) that enables the downstream users to incentivize for the community’s or government agency’s effort to manage, protect and conserve the catchment area in the upstream.

**44. Regional (Philippines, Viet Nam): Blue Horizon: Ocean Relief through Seaweed Aquaculture, WWF-US, [GEF Project Financing: \$6,000,000] [GEF ID 10573]**

✓ **Australia Comments**

*The below comments from Australia 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.*

- Regarding the regional project in the Philippines and Viet Nam, we note that it is working in the South China Sea. Could you provide more information as to where in the South China Sea this project will be operating?

✓ **Germany Comments**

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

Germany welcomes the proposal to work in the coastal and marine ecosystems of the Philippines and Viet Nam for the expansion of seaweed aquaculture and the respective value chains. The regional scope for relevance of expected results and impact beyond the two countries is comprehensible.

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

- Germany suggests to seek cooperation and synergies with the ongoing bilateral cooperation between Viet Nam and Germany “Working for a climate-resilient future for the Mekong Delta” which works on improving coastal zone management, climate change resilience impact, gender mainstreaming, regional coordination of investment planning, sustainable value chains for aquaculture products, and cooperation with the private sector and civil society to further develop value chains (<https://www.giz.de/en/worldwide/73408.html> ).
- Germany suggests to consider what form of continuation the four planned demonstration farms can have, beyond the lifetime of the project, in order to continue to serve the purpose of capacity building for farmers and other stakeholders.

✓ **Norway/Denmark Comments**

**General comment:**

- Overall, this is a good project that aligns well with Vietnam’s marine economy priorities and taps into a potential resource of the country.

**Specific comments:**

- Further elaboration on rationales for selecting Vietnam and the Philippines for this project and how they could complement or cooperate in this project;
- The mapping of the related projects should include on-going and upcoming projects on climate change, marine plastics and blue economy and how this project could cooperate and synergize;
- The role, division of work and labour among the project’s regional, national and local partners and stakeholders should be further spelled out. Private sector, sea culture associations and local NGOs should be given adequate attention;
- The risk mitigation should be improved as the overall risk assessed is from medium to high. There is also little or no assessment of potential risks negatively affecting cross-cutting issues, especially with regard to environmental impact. Reference is made to assessments and methodologies for ecosystem carrying capacities and ASC & MSC seaweed standards with guiding principles for sustainable seaweed production. This is important but needs to be further assessed.

- Even though seaweed potentially could have many positive effects on food security and climate change, there are still large knowledge gaps attached to the potential negative impacts on the ecosystem from large scale seaweed production and will necessitate a more complete understanding in order to balance environmental risks with the benefits that seaweed cultivation projects can offer. Large amounts of seaweed biomass can lead to oxygen deficiency, changes in biodiversity and poor ecological condition. Large uptake of nutrients will be able to outcompete natural seaweed and algae growth which in turn can affect the basis of the food chain, fish stock and ultimately humans. Whether seaweed cultivation contributes to the unwanted spread of species, genes and diseases is currently largely unknown.
- The Scottish Association for Marine Science is an important partner in this regard. They have published work on the environmental risks associated with the development of seaweed farming, and identified potential risks, effects, mitigating measures and monitoring requirements with regard to seaweed cultivation (Addition of Artificial Material, Absorption of Kinetic Energy, Release of Dissolved and Particulate Matter, Habitat for Diseases, Parasites and Non-native Species etc.). This could be an important tool in developing a sustainable contribution.
- As a regional project, the national ownership does not seem to be strong and as a result, the project’s sustainability might need to be further looked into. The implementation structure within each country should be more detailed and prior stakeholder consultation is necessary;
- There should be more description of the implementation plan (description of potential demonstration sites/criteria, private sector engagement plan, discussion/alignment with local socio-economic development and environment protection, climate change adaptation plan...);
- The result framework should include planned activities to achieve the expected outcomes/outputs with measurable indicators;
- Knowledge dissemination, model scale up, technology incubation/development measures need to be thought through.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- We note GEF has to be careful that projects do not inadvertently appear to support territorial claims in disputed territories. Climate change and biodiversity are global issues and are not separated by political/geographical boundaries. The South China Sea is also a sensitive area although we do note that the project is flagged as “international waters”.

✓ **United States Comments**

- The USAID Protect Wildlife Program, which closed in December 2020, has supported three community-based organizations in southern Palawan and Zamboanga City with conservation-oriented seaweed production. We recommend that this project utilize the lessons learned from that work.

- When looking at adaptations and new technologies, we recommend looking at the negative impact of climate change on seaweed production, and its connection with “ice-ice disease.” We also recommend exploring “aged” seaweed in later iterations of the project to increase carbon sequestration.

## MULTI-FOCAL AREA

### **45. Regional (Afghanistan, Tajikistan): Institutionalising Transboundary Water Management between Tajikistan and Afghanistan for the Panj River Sub Basin, FAO, [GEF Project Financing: \$ 7,991,781] [GEF ID 10714]**

#### ✓ Germany Comments

Germany welcomes the project on transboundary water management to manage nexus trade-offs in the Panj River basin. The project would benefit from a consolidated focus on thematic areas that will be addressed, as well as further development of the water management component, which should take into account political settings and relations in the relevant water governance institutions.

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

- Germany would like to stress that the involvement of UZB and TKM in transboundary water management elements is necessary. Furthermore, a possible Afghan membership in the International Fund for Saving the Aral Sea (IFAS) could be discussed in this context, as well as TAJ having taken over the presidency of IFAS for the next three years.
- All technical projects at the up-stream Amudarya will be monitored critically, especially by TKM, as there is considerable fallout between TAJ and TKM. TAJ will have to develop regional priorities with the other IFAS member states. These will touch upon cooperation along the Amu Darya. Up-scaling will be made impossible, if the downstream countries are not on board with this project.
- Please note, that the Panj and Vaksh are forming the Amu Darya River, which is one of the main tributaries to the Aral Sea (p. 35). Concerning the function of the Interstate Commission for Water Coordination in Central Asia (ICWC) (p. 38), ICWC is part of IFAS and the body of the five water ministers of Central Asia (CA). A sustainable development agenda is not part of the mandate of the ICWC but resides with the ICSD- Interstate Commission for Sustainable Development, which is a body of the environment ministers of the five CA states. Germany suggests as an innovate approach to support the inclusion of AFG into IFAS.
- “*Output 1.1.2:*” → Germany kindly reminds that both countries are already implementing IWRM principles, TAJ has adopted a new Water Code on 12/02/2020, which is based on IWRM principles. Germany asks to consider that basin plans are prepared for all Tajik basins with the help of different international organisations (EU, Helvetas/GIZ, JICA, etc.).
- “*Output 2.1 & 2.5:*” → It is not clearly described who should be represented in the Joint Technical Committees (JTC). If a wide array of stakeholders should be represented in the

JTC like in the Basin Councils, for example, a gender balance is nearly impossible. There is an unclear definition between JTC and Bilateral Basin Coordination Committee. Germany kindly asks for an explanation if this is supported by the new Tajik Water Code.

- “Output 4.3:” → Once a year is not enough to inform the stakeholders. Germany suggests intensifying stakeholder participation as this does not qualify as a participatory approach.

✓ **Switzerland Comments**

**Relevance/Orientation:**

- In general, the project seems highly relevant and very interesting to Switzerland. But, taking a closer look at the proposal and considering the context, Switzerland questions, whether it will be successful in the current format. Please find some comments and recommendations below, which should be considered in the further development of the project.

**Project setup – main observations:**

- the *ambitions are very high* (kind of silver bullet for Panj, even if the project mainly focusses on “water for and from agriculture”, so is by far not “integrated” in its approach), the *timeframe for implementation is unrealistic* (5 years?),
- the *designated implementer FAO has an unclear track* record with International Water Resources Management in Central Asia. We recommend that the implementing agency will strongly engage with other agencies in International Water Resources Management from the region to ensure that the project is well embedded and builds on existing experiences and results;
- the *links to other initiatives are unclear* in particular the EU-Nexus initiative running in Central Asia for several years now does not seem to be known to FAO, as they consider their *nexus-focused assessment to be an innovative perspective for the region*
- the *budget is impressive but probably rather unrealistic*  
The 54 million USD co-financing don’t seem to be implementable. Have the 39 million USD in kind from MoWR and TJ as mentioned on p10 really been confirmed and can they be provided? We also question the figures on p27 ff of the budgets/contributions of the different projects, eg we don’t believe that in TJ, MEWR and MoF will invest 168.1 M USD per year into the “national basin planning process” Please ensure that the indicated figures are sound and that the co-financing indications can really be implemented otherwise we strongly argue for a lowering of the figures to realistic implementable levels.

**Project setup – more detailed points:**

- In many places, the wording is overly optimistic (eg “this will be achieved by putting mechanisms and processes in place that reverse the present trends in overexploiting natural resources”).
- Confusion of means and objective: in our understanding Component 2 is the objective and other components are a means to the end. Therefore, the used methodology is not



understandable here. Similarly, boundaries between outcomes and outputs are blurred; the project does unfortunately not make any commitments towards a result, it remains process oriented and the benefits both for people nor environment are not intelligible. Outcomes are extremely vague and do not provide useful information and the "what is going to be done". And they don't inform about the expected results

- Component 2: looks interesting; but is not really integrated. Energy and water quality are mentioned, but the former is not mentioned in the following, the latter only linked to agriculture; Output 2.5 speaks about the establishment of a bilateral basin coordination committee embedded in national legislation, but does not mention that such committees also will need to be funded
- Component 3: USD 23 mio for pilot projects ? Seems very expensive.
- Baselines: no mentioning of IFAS (only IWCW mentioned), no mentioning of any treaties with the TJ-lead agency on water (Ministry of Energy of Water)
- Water quality issues (related to agriculture) are prominently mentioned – but and joint action plan to reduce pollution will most likely be depending on further funding of donors (a strategic action plan, pushed by an international partner, does not guarantee its approval, as we could learn from the case in Chu-Talas between KG and KZ).
- Context analysis (project justification) does not mention overgrazing and soil erosion as threats to availability of water and its quality. The consequences of "peak waters" is not mentioned though a large volume of water will result in the melting of glaciers.
- The associated base-line projects seem to consider only WB and GEF(?) projects. There are other interventions worth mentioning such as the Pamir Energy company or the Khorog Urban Resilience Project. The latter just created an electricity producer/supplier company in Afghanistan (Faizabad). That again gives the impression that *this project tends to apply a stand-alone approach.*
- "Output 3.1: Transboundary data-sharing mechanisms to inform effective drought and flood risk management." In TJ, there is already a platform called Open Centre. It pools the data from various ministries and allows common understanding as well as coordination.
- Security situation in AFG not really considered except in the risk table. The latter might be overly optimistic for some risks (eg climate risks, lack of sustained political support, risks related to COVID)
- The transboundary institutional structure is first based on Joint Technical Committee and next Bilateral Basin Coordination Committee;
- The link to the Aral Sea, i.e. to improve the situation of the Aral Sea is completely unrealistic. If they work on the Panj, the benefits should be for the riparian states above all. Some wording in the text is much too optimistic: "once this has been achieved, it is envisaged that the cooperation between TJ and AFG for the Panj River could be expanded to cover the entire Amu-Darya River Basin..." and "After successful completion of this project, these [foundations] will serve as promising platform for connecting the upper catchment with the existing institutional structures of the existing AD-River basins" – The countries and international community have been working on

such issues for the last 30 years...The impact on these issues will probably be modest at best.

**Conclusion:**

- The proposal is interesting but lacks coherence. It looks like an addition of interventions, each of them being (more or less) important, but without clear red thread and detached from other (ongoing) interventions; the project appears to work in isolation. Thus, the proposal fails to convince in its present form and should undergo a major revision. One idea - apart from better embedding it into the context (through i.a. close interaction with active stakeholders incl. Swiss Development Cooperation) - could be a step-by-step approach: A jointly agreed and evidence based transboundary diagnostic analysis could provide the necessary fundamentals for further discussions (incl. the international community) and further development of more realistic interventions. The governments and officials from both sides should then approve the further development of such interventions.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- Why is this not an international waters project?

**46. Bangladesh: Community-based Management of Tanguar Haor Wetland in Bangladesh, UNDP, [GEF Project Financing: \$4,050,913] [GEF ID 10702]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Canada Comments**

- Canada would like to note that this project is not tagged to Biodiversity Rio Marker (only climate change mitigation and adaptation listed).

✓ **Germany Comments**

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

- The proposed project is ambitious and aims at employing a whole-of-wetland approach, including conservation, restoration, sustainable resource use, livelihood support and monitoring, embedded in an integrated co-management framework of the Ramsar site Tanguar Haor.

- The project proposal could benefit from specifying the role of the different actors involved, especially Bangladesh's Department of Environment (DoE), in the cross-sectoral planning, the consultations planned with local communities and indigenous peoples and the development of a participative co-management framework.
- A stakeholder mapping and the development of specific strategies for their engagement (especially women, local indigenous peoples and local communities) seems to be necessary.
- Germany suggests including the issue of land tenure security in the project proposal, being this a major source of conflicts among key stakeholders identified.

✓ Norway/Denmark Comments

- The proposal has not clearly presented the role that UNDP will have in the project or what their added-value to the project is. Given the number of actors in the sector as outlined in the stakeholder analysis. It would be important to understand UNDP's comparative advantage in being the project holder. It is understood that one of the major barriers is the lack of coordination in the sector, is this the area where UNDP would use its expertise?
- The Danish embassy in Dhaka has explicitly mentioned that it has had quite some concerns over the financial management by some of the government partners in Bangladesh over the past years due mainly to concerning accountability findings that seem institutional in nature and have pointed out that therefore that it is incredibly important that UNDP takes a proactive approach to ensuring proper financial management and accountability if supporting any of these institutions.

✓ United States Comments

- We recommend collaboration with USAID's Ecosystem Activity (Protibesh) in this region.

**47. Chile: Restoration of Biodiversity and Ecosystem Services at the Landscape Scale on Productive Agroforestry Areas and their Natural Environment, FAO, [GEF Project Financing: \$5,674,032] [GEF ID 10718]**

✓ Canada Comments

- Canada would like to note that it is important to look to local and regional examples of success that can be used as a launching point for new work. Natural Resources Canada-Canadian Forest Service hosts the International Model Forest Network (IMFN) Secretariat which provides leadership and technical support to over 60 large scale landscapes in six regional networks covering 73 million ha in 35 countries. Chile has been a member of the IMFN since 1998 and has advanced sustainable forest management efforts through the Model Forest approach. Chile has three Model Forests encompassing more than 1/2 million ha, addressing issues as varied as strengthening public-private partnerships, forest landscape restoration, and land-use conflict resolution.

- Specifically, Chile's three Model Forests - Panguipulli, Araucarias del Alto Malleco and Cachapoal - are representative of three unique forest types and are being used as landscape level demonstration sites to build capacity, calibrate models and pilot forest management plans for eventual use at a national scale.
- Inclusive and shared governance approaches to natural resource management are critical to addressing challenges in diverse landscapes around the world and these approaches will be even more relevant in the COVID-19 recovery. The inclusive nature of Model Forest partnerships coupled with a commitment to networking helps local actions in the integration and in some cases, shaping of national, regional and international commitments.
- The IMFN is a growing, global, voluntary network dedicated to sharing innovative practices and advancing sustainable landscape management through concrete action.
- The Model Forest approach offers an effective and flexible process that creates broad and inclusive partnerships and convenes stakeholders representing the environmental, social and economic forces at play on the landscape. It is an approach that is founded upon principles of Partnerships, Sustainability and Landscapes (Good Governance, a program of activities reflective of stakeholder needs and knowledge sharing, capacity building and networking).

✓ **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.*

Tropical forest-related programs (GEF ID #10726, 10689, 10678, 10718, 10688):

- We welcome these important tropical-forest-related programs, especially as they relate to productive forest supply chains and landscape restoration, which are issues that require urgent global attention. We support a rigorous data-driven approach to this field, and wonder whether the focal agency on forest-related supply chain/ trade matters within the CPF and the main data provider for tropical forests to the FAO is involved i.e. the International Tropical Timber Organization (we only see the TFA mentioned). To better align with an inclusive multi-stakeholder approach, we request the involvement of specialist organizations/platforms as these with the relevant global data, expertise and networks to ensure efficient and effective approaches to relevant stakeholders and to reduce duplication of effort in the global arena. The organization also has relevant indicators and guidelines on legal and sustainable supply chains and forest landscape restoration related to tropical forests, which can help assess and measure impact of relevant projects.

✓ **Germany Comments**

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

Germany welcomes the planned efforts to combat land degradation in Chile's Mediterranean ecoregion where deforestation is such a serious issue. It similarly commends the information provided on past initiatives and ongoing national efforts so as to highlight synergies the project

will create during implementation. Moreover, notes on gender-sensitivity and the inclusion of indigenous communities are well received.

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

- However, in section 3, more information could be provided on how the wide range of expected outcomes cited are to be achieved, and potential trade-offs could be formulated. Also, while possible nature-based solutions and agroforestry practices are suggested and economic instruments for the implementation of project component 2 are named, benefits for biodiversity are only described in very general terms. Biodiversity benefits could be characterised with greater reference to the project region.
- Finally, since the project's name mentions 'productive agroforestry areas', the project description could include a characterisation of the region's agroforestry systems, i.e. both present and planned agroforestry approaches, and how the latter will contribute to incentivising more sustainable land management approaches.

**48. China: Innovating Eco-Compensation Mechanisms in Yangtze River Basin (YRB), ADB, [GEF Project Financing: \$8,073,396] [GEF ID 10711]**

✓ Canada Comments

- Canada would like to note that this project is not tagged to Biodiversity Rio Marker in the PIF (only climate change mitigation 1).
- The proposed project objective is to promote innovative eco-compensation mechanisms which contribute to improved and sustainable terrestrial and freshwater ecosystem health in the upper and mid-Yangtze River Basin but, under the gap analysis section, the PIF states that there is no known comprehensive analyses which has assessed biodiversity and ecosystem services in nature reserves. Of the 32 existing Protected Areas within the Chishui River Basin, 11 are nature reserves.
- Canada would like to note some concerns with how progress will be assessed in terms of improved and sustainable terrestrial and freshwater ecosystem health for those areas beyond the proposed indicators for interventions in the Chishui River Basin (currently listed as : 1) 80, 000 hectares Terrestrial protected areas newly created ; 2) 480,834 hectares Terrestrial protected areas under improved management effectiveness and 3) 2,000 hectares Area of forest and forest land restored ).

✓ 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 proposal considers creating and strengthening sufficient local ownership. The proposal mentions under output 2.1. that additional 80.000 ha of the area should get under protection but that most of this land is owned by local communities.
- Additionally, it is mentioned under output 2.4. that "Local communities will contribute their collective owned land for conservation". It can be expected that this will lead to a major problem of acceptance, even if monetary compensation will be provided. In order

to create such acceptance, the measures will have to be flanked by information campaigns explaining the necessity to local governments, communities and individual farmers, including on the overall gains that a healthy environment creates.

- The proposal stresses the situation of red-listed species as a reason for the necessity of enlarging the protected areas. From a conservation perspective this makes absolute sense, but from a campaigning perspective it should be avoided to create the feeling that locals have to abandon their land for these species, as this creates a negative attitude against these species which can endanger them even stronger (poaching, killing, etc.). Education on the values of biodiversity could also be integrated into school curricula.
- Overall, the project proposal is lacking measures for capacity development and trainings for local stakeholders that could help to foster local ownership. This could include trainings on the use of adapted fertilising techniques and alternative pesticides, avoiding/reducing/changing the use of the plastic films, treatment of waste etc.
- In addition, the assumption of the Theory of Change it is mentioned that local communities are not fully engaged. One would expect therefore that under strategic approaches to tackle this problem the full engagement would be mentioned as a goal to be reached. We would therefore like to request that full engagement and consultation of local communities, as described in the first point, is fully integrated into the project proposal.
- We would further like to request that the proposal states the obvious links to the Aichi-Targets and the Sustainable Development Goals by stressing how the planned outcomes would help to implement some of them. This could either be done by referring to individual targets under each outcome or by inserting a table that lists the outcomes against the Aichi-Targets/SDGs. Specific Aichi-Targets that get implemented would include AT1 (mainstreaming), AT2 (integration into planning), AT4 (sustainable production in business), AT6 (avoid overfishing), AT7 (sustainable agriculture), AT8 (reduce pollution), AT11 (protected areas), AT12 (endangered species), as well as SDG 14 and 15 (biodiversity) and those dealing with poverty reduction, reducing hunger, provision of clean water (SDG 6) and others.
- The funding programme “CLIENT II” by the German Federal Ministry for Education and Research (BMBF) is currently financing several water-related adapted research projects in the Shanghai area. The BMBF project office "Clean Water," Shanghai, (<https://www.bmbf-client.de/en/offices/shanghai>) helps to coordinate these projects. Findings of the programme could be relevant for the implementation of the proposed project.

✓ **Norway/Denmark Comments**

**General comments:**

- The proposed project is highly relevant to China’s major policies and priorities. In particular, President Xi stressed the importance of advancing the integrated development of the Yangtze River Delta again at a symposium he chaired in November 2020. The proposed project takes environmental, social and economic factors into consideration which is in line with the national priorities. The proposed GEF support will also

contribute to the implementation of SDGs and several multilateral agreements such as CBD, the Stockholm Convention, the Basel Convention, and the UNFCCC.

- The proposed project will demonstrate the GEF's unique strength in catalyzing institutional reform at project area and national levels by refining eco-compensation mechanisms in China, changing behaviors of cooperatives and private industries in project areas, and sharing knowledge and experiences through the proposed natural lab virtue platform at regional and global dimensions. The expected project results can be sustained and widely shared through the above changes and innovations.
- The proposed project presents a strong partnership led by ADB and the National Development and Reform Commission (NDRC- the coordinating planning and management Ministry). The proposed project will build upon ADB's investment in Yangtze River Economic Belt and make sure the results complement each other. NDRC can play a significant role in coordinating relevant line ministries and local authorities to agree on an integrated approach.
- The risk analysis identified several major risks such as information availability and sharing, interprovincial relationships, commitment of project agencies to cooperation and coordinated efforts and so on, through mitigating options had been suggested such as NDRC's role and setting up a project steering committee. It is important to make sure a good monitoring plan is developed, followed and that actions are taken in a timely manner towards the expected overall objectives.

**49. Cuba: Mainstreaming Biodiversity Conservation and Climate Change Mitigation in Sustainable Tourism Development in Cuba, UNDP, [GEF Project Financing: \$ 35,98,630] [GEF ID 10670]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Germany Comments**

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

- The proposal would benefit from setting (preliminary) targets and indicators for Outcomes 1.1, 2.2, 2.3 and 3.1., which could be revised during PPG phase.
- In component 2, the link between the tourism sector and biodiversity conservation activities (such as connecting ecosystems or managing invasive alien species) could be elaborated more in depth, e.g. addressing the issue of which actors are going to be responsible for which kind of conservation activities, based on which kind of ecosystem/environmental assessment.

- Component 4 could be developed more in depth, especially the scaling-up of the lessons-learned from the pilot sites concerning biodiversity conservation.
- The gender mainstreaming and specially the gender action plan could benefit from more specification, since gender aspects are not mentioned in the description of components 1 to 3.

**50. Iraq: Promotion of Integrated Biodiversity Conservation and Land Degradation Neutrality in Highly Degraded Landscapes of Iraq, UNEP, [GEF Project Financing: \$ 4,538,128] [GEF ID 10672]**

✓ **Canada Comments**

- Canada notes that this projects seems to focus on achieving land degradation neutrality in the Middle Euphrates landscape through integrated landscape management. However the primary mechanism for doing this seems to be by establishing four new protected areas, which is not really restoration and / or a seemingly new or innovative approach.
- Canada notes that STAP welcomes this proposal and highlights minor issues to be considered during the project design. Assuming the appropriate steps are taken to ameliorate the components of the project that are currently lacking. However, Canada would welcome more detailed information about how the project will show that there will be clear activities to facilitate land neutrality other than by protecting areas.

✓ **Germany Comments**

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

Germany welcomes the project on improving biodiversity and land degradation neutrality (LDN) in the targeted areas in Iraq and commends the synergies with other similar projects and initiatives that were listed.

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

- Importantly, we endorse the project’ integration of gender in several components but recommend that the percentage of female beneficiaries is made more precise and is further targeted in stakeholder management.
- Additionally, we recommend that local women’s organizations be included as stakeholders in the project to better address gender aspects.
- Furthermore, while the proposal states relevant information on land degradation in Iraq, we recommend providing an updated land degradation baseline to better measure the project impacts in the future.

**51. Kyrgyz Republic: Integrated Community-based Management of High Value Mountain Ecosystems in Southern Kyrgyzstan for Multiple Benefits, UNDP, [GEF Project Financing: \$ 2,639,726] [GEF ID 10692]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be*



*circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Germany Comments**

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

- With the exception of the forestry sector, responsibilities of the management of natural resources in Kyrgyzstan are not well defined and monitoring of respective management activities (pasture, water and agricultural) land is not very well developed, resulting in an increased deterioration of natural resources and a need for projects like the one proposed here.
- Considering the challenges Kyrgyzstan faces when implementing conservation measure, it is suggested to connect with the GIZ project “Ecosystem-based Adaptation to Climate Change in high mountainous regions of Central Asia”. The project aims at providing policymakers in Central Asia with structured guidance and concrete examples on how to analyze climate risk information and integrate it into public policy planning and public planning. This project has also developed a methodology on the Conservation Standards Applied to Ecosystem-based Adaptation (CoSEbA) which is a multi-stakeholder approach to developing and implementing a climate change adaptation strategy. This approach can help identify priority ecosystems, assess climate-related and non-climate-related threats and find the most appropriate measures as well as identify responsibilities for different natural resources and how they are managed.
- We also recommend to further engage with GIZ offices located in the region to promote synergies and mobilize co-financing, as the current phase of the project “Sustainable and climate land use for economic development in Central Asia (SUSTAIN-CA)” will cease activities in 2020.

✓ **Switzerland Comments**

**Relevance / orientation:**

- In principle, the topic is relevant: safeguard globally significant biodiversity of high value Pamir-Alai mountain ecosystems, restore degraded lands, and ensure maintenance of critical ecosystem services for sustainable livelihoods in the Kyrgyz Republic. This is a real need in KG as well as in many other mountain ecosystems.
- But it is less clear, how high such a need is really on the list of priorities of the government which is currently absorbed (including its financial capacities) with the COVID crisis. It can be assumed that the actual “demand” of the GoKG and thus the needed political willingness to walk the talk beyond this project might not be that solid, simply due to other priorities. That puts the question of how sustainable such an ambitious initiative will be in the first line of concern. And speaking of ambition: safeguard biodiversity, restore degraded lands and ensure critical ecosystem services are

all likely to include a considerable amount of transformation of the current “business-as-usual” to a better approach. That does take (a lot of) time and cannot be achieved in the frame of one project (of which the duration is unclear).

### **Project Setup:**

- Finances: the GEF contribution of 2.6 M USD is expected to be complemented with 14.5 M from other sources, including from national sources. For instance, the State Agency for Environmental Protection and Forestry shall contribute 3 M USD with public investment. Are these amounts really all secured (particularly in view of the budget pressure due to COVID) or not (yet)? Please ensure that realistic co-financing figures are included in the project documents which are implementable and will also be monitored.
- Embedment and partnership: it is rather unclear, how deep the understanding of the context and the past/ongoing/future initiatives from other partners actually are. The proposal does focus on mountain ecosystems, but makes no reference to e.g. high-level policy events in KG (2002 Global Mountain Summit; 2018 World Mountain Forum, see [IISD/ENB+ @ WMF 2018 | 23-26 Oct 2018 | Bishkek, KG | IISD Reporting Services](#)). Nor does it mention UNEP and their recent activities in the region on CCA (see eg [Climate change action in developing countries with fragile mountainous ecosystems | UNEP - UN Environment Programme](#)).
- The proposal mentions (p54), that the project will *coordinate closely with other relevant work by multilateral, bilateral, and civil society partners (e.g. World Bank, Asian Development Bank, GiZ, FAO, GCF, Swiss Development Cooperation)*. *The scope of this proposed project has been carefully designed to be thematically synergistic with other current ongoing efforts in Kyrgyzstan, and to avoid any geographic overlap in the target region.* The latter might be true, but it is not clear how far the coordination and the efforts for synergies actually went up to now.

### **Conclusion:**

- This proposal should be further improved with national/regional experts and in collaboration with other agencies to ensure it is well embedded, does not operate in isolation and meets realistic targets.

### ✓ **United States Comments**

- Given the broad scope of this project, we would recommend strengthening training activities in rural livelihood skills, including refresher trainings on GIS mapping, and pasture management.

**52. Madagascar: Evaluation of Natural Capital to Support Land Use Planning, Improved Management Effectiveness of Terrestrial Protected Areas, Deployment of SLM Practices and Creation of Eco-Villages in Central Madagascar, UNEP, [GEF Project Financing: \$ 5,653,425] [GEF ID 10389]**

✓ **Canada Comments**

- Canada believes that this project would benefit from additional clarity in terms of how success will be measured (e.g. in terms of how an eco-village would be defined and how this would be measured).

✓ **France Comments**

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

- A joint project (called TOTEM) has been presented to the FFEM by the French NGO, GRET. The FFEM Scientific and Technical Committee and Steering Committee have several question on the financing plan of the hydropower infrastructure. According to the FFEM, this infrastructure is not the innovative part of the project. The FFEM is a lot more interested in the innovative community governance, based on the “commons” approach, for this infrastructure and the energy transition in general in the area. However, this part is obviously directly related to the hydropower plant. In this context, the FFEM could envisage to finance a minor part of the hydropower alongside robust cofinanciers. The GRET mentioned that the GEF would cofinance the hydropower infrastructure. As in the PIF, the FFEM is identified as financing the hydropower plant, I would like to check with you if the GEF is considering financing a part of the hydropower?

✓ **Germany Comments**

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

Germany welcomes the strong rationale and community-centered approach of the project that aims to link natural capital assessment, capacity development and the establishment of Ecovillages in order to create change for sustainable development.

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

- Revise the project component structure and clearly assure that the different components that build on each other are consistent, e.g. how will the results of the NCA process feed into land use plans, at which level are the proposed plans, how are ecovillages delineated by communal level and/or catchment level?
- Elaborate on defined indicators and re-consider feasibility of change that can be achieved within the sphere and timeframe of this project, taking into account the high ratio of co-financing using major parts of a GCF funded project (COFAV NPA). Even following a theory of change logic, defining indicators that correspond to the level of either component, outcome and/or output of the project, seems to be useful to monitor and achieve impact indicators.

- Elaborate and reconsider the taken approach in relation to the objective of sustainable development: Focusing on conservation within the ecovillage component seems a very conservative approach, as the aspect of sustainable development seems to be neglected and contradictory to the very value of the ecovillage concept. To confirm the cross-sectoral aspect advocated, the governance structure at municipal level through the Municipal Committee for Spatial Planning should be enhanced so as not to duplicate existing structures and to experiment with other governance models. To bring a land use planning/landscape approach in line with the evaluation of the natural capital, re-considering the chosen area of intervention in relation to large catchment areas using FLR seems appropriate.

**53. Myanmar: Mainstreaming Biodiversity Conservation and Restoring Forest Landscape Connectivity in Bago Region, Myanmar, UNDP/WWF-US, [GEF Project Financing: \$ 7,122,693] [GEF ID 10699]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Canada Comments**

- Canada observes that some local CSOs could successfully initiate eco-tourism initiatives in this area.
- Please note that KESAN, a partner of InterPares, won the Goldman Environmental Prize this year, and is also working with some communities in Taungoo district on biodiversity conservation.

✓ **France Comments**

Coordination with other projects, for instance financed by the FFEM:

- Possible links with the [second phase project on the Indo-Burma hot spot](#) (funded by AFD and FFEM).

✓ **Germany Comments**

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:

- The program makes reference to lessons learned from other initiatives – however, the potential for South South exchange is not yet developed. Vietnam, Cambodia and

particularly Laos have received support with similar challenges and could help with learning experiences, especially through the network(s) established by WWF.

- These learning programmes should also be reflected in the knowledge management strategy and the projects theory of change to ensure durability and sustainability of project outcomes after completion.

✓ **Norway/Denmark Comments**

General comments:

- The applicant demonstrates good knowledge of relevant sectors in Myanmar and the project is highly relevant in terms of addressing land use planning, protected area management and land governance. Biodiversity loss, lack of connectivity between habitats and land degradation is prevalent in Myanmar and in this region in particular.
- On the relevance and coherence of partner selection for the project both partners are relevant.
  - UNDP – its long presence in Myanmar with some experience in supporting the Government in the development of national environmental policy, their work around formation and establishment of community forest user groups, supporting the communities and sub-national governments in development planning (bottom-up) and other community development work would probably make UNDP a qualified partner for this project. UNDP needs to present a more clear reference regarding their technical capacity/experience in the area of biodiversity conservation approach.
  - WWF- There are a limited number of other actors working in wild life conservation in Myanmar and WWF according to the Forest Department is actively involved in the elephant affairs. The embassy has cooperated with WWF on renewable energy related activities and have had a good working relationship with the organisation in that area.
- Land governance is recognized as key for sustainable land management. The project reflects this and has a strong focus on the role Community Forest User Groups (CFUG).
- The risk of further deforestation, forest degradation and loss of biodiversity and ecosystems, is high. Inadequate management frameworks together with weak law enforcement and prevailing illegal logging, call for urgent action.
- The barriers identified in the application and the project components seem relevant.
- The project has a well-developed structure with a plausible ToC, relevant outputs and indicators, a good approach to knowledge management but under-communicates the challenges caused by strong economic forces/political economy that may resist the foreseen changes. The project document does not also display a convincing awareness about and sensitivity towards the ongoing ethnic conflicts in the area, in which land rights play a central role.
- Parts of Bago are under KNU control. In these areas, forest management and land use are sensitive dimensions of the ongoing conflict (see more specific comments below on this issue).

- In the extent that the project will operate in KNU-areas, conflict sensitivity is critical, but not very thoroughly discussed in the application.
- Other projects do related and sometimes overlapping work in the same area, among them Norway's bilateral environment program (an institutional cooperation involving the Norwegian Environment Agency). Coordination will be important.

**Specific comments related to the land conflict:**

- The document mentions involvement of IPs in the stakeholder analysis but does not spell out any major risk or any risk mitigation measures pertaining to the Ethnic Armed Organizations, of which the Karen National Union (KNU) is active in parts of the Bago region. Unless the project detailed operation plans avoid disputed territory, the project should have a more visible strategy related to land conflicts. The KNU has an elaborate stand on land policy issues, and land conflicts are identified as a key barrier to the peace process.
- If the project area does not overlap with areas of KNU control or influence, these elements may be of less importance. If, however, that is not the case, it seems as if the project has an insufficient strategy to address these obvious risk elements. This could lead to severe challenges in achieving project outputs and outcomes. The project document should specify how the project will address these factors. Addressing them in a comprehensive manner could potentially lead to substantial changes to the project plans.
- The proposal makes reference to the national policy and targets such as MRRP, NBSAP that to a large extent does not cover KNU and other EoA controlled areas. The KNU's land and forest management policy, not like national policy, is largely influenced by the collective ownerships, indigenous conservation systems and the decision making authority of customary leadership/councils. If the project is going to cover those EoA controlled areas, it would be necessary to adopt a different approach. Moreover, from the project proposal and the GEF document, it is understood that the project does not deal with the armed conflict areas and thus reference made to KNU/EoAs can be considered less relevant.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- The UK is content to have GEF investments in Myanmar and welcome the initiatives; it's particularly good to see links between biodiversity and livelihoods opportunities
- We would like to ensure this is linked up with other central funding.
- We Welcome the community-based approach, yet bearing in mind conflict and ethnic presence, the project shall ensure adequate conflict-sensitivity is at core and think through modalities to work at local-regional-central level, esp. to share good practices. In particular, land and forestry is contested in Myanmar with multiple layers of laws and community practice. Much will depend on specific areas that the project will cover, yet in the proposed areas there are mixed control (Karen National Union) areas in Bago (Eg. Kyaukkyi) – so who own what land or forest based on what / whose law is quite sensitive.

- Inclusion of local communities and civil societies should take place since in the beginning of the project for it to be impactful.
- In terms of forest landscape planning, we recommend looking into a community-based bamboo plantation/management in Bago which is a promising growing area.
- Could the partners be a bit more ambitious in terms of results; the number of beneficiaries to project value ratio a bit low. We assume it may not be easy to define a clear, numeric, accountable link between ecosystems, biodiversity and livelihoods, yet, we would also expect impact (of improved ecosystem services for example) to local communities to be much larger.

**54. Philippines: Sustainable Management of Natural Resources towards Rehabilitation and Preservation of the Key Biodiversity Area along Bataan Province to Manila Bay, FAO, [GEF Project Financing: \$ 2,731,050] [GEF ID 10704]**

✓ **Germany Comments**

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

Mainstreaming biodiversity in local policies is important to sustain project efforts and gain political support for ecosystem protection as an investment for the future. Germany welcomes the project with its highly participatory approach and the link to the Master Plan for Sustainable Development in Manila Bay. It demonstrates a potential for the scaling-up of lessons learnt and good practices through several key partnerships.

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

- Germany proposes to consider the following aspects for the final project proposal: During PPG clearing of how the core indicators are calculated and carrying out and document full consultation process to reflect stakeholder needs, their relevance and how their engagement will be activated.
- Multi-stakeholder platforms with mandates could prove difficult in practice as mandates are already allocated to different levels of government and cannot be easily delegated - if this requires new policies/legislation, this can take a long time. This should be carefully considered whether it can realistically be achieved by the project.
- It is recommended to explain how investments in Bataan province will be safeguarded against inconsistent implementation of the policy for rehabilitating Manila Bay. A recent government project on beach feeding in Manila Bay, which is not part of the master plan, has raised questions about the government's view on the principles of ecology in relation to policy direction.
- Apply do-not-harm principles, particularly in areas with indigenous communities.
- PH sustainable development targets should be included, e.g. Philippine Biodiversity Strategy Action Plans (national, regional and provincial levels) and NEDA's 2040 target).
- Suggested synergies and additional, potential partners for cooperation are the national ICP (Integrated Chemists of the Philippines) and FPE (Foundation for the Philippine

Environment), which has experience with community-based natural resources management in the area.

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- How will the similar projects in the work programme for the Philippines be coordinated with two different delivery partners?

✓ **United States Comments**

- We recommend greater clarity at the next phase of project development on how the project's activities would address the specific threats to biodiversity listed in the PIF.

**55. Solomon Islands: Safeguarding Solomon Islands Endemic and Globally Threatened Biodiversity and Ecosystem Services from Key Threats, particularly Invasive Alien Species and Unsustainable Land Use Practices (SAFE project), UNDP, [GEF Project Financing: \$ 7,845,662] [GEF ID 10698]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Germany Comments**

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

- The overall project approach is very comprehensive, involving a number of very different intervention points. It would therefore be important to ensure that the overall project objectives are met sufficiently, leading to the intended changes in operations and behavior, and the project's long-term sustainability is guaranteed.
- Germany would thus like to suggest that project proponents reevaluate overall feasibility and likelihood of the long-term sustainability of the project. Each project component should receive adequate resources (time, human and financial) in order to ensure overall project success. This should also be reflected in the projects risk management and theory of change.

✓ **United States Comments**

- We recommend additional collaboration with the USAID's Strengthening Competitiveness, Agribusiness, Livelihoods and Environment Program, and the Pacific



Island Forest Restoration Initiative, which could enhance the project's capacity and resiliency.

**56. Sri Lanka: Natural Capital Values of Coastal and Marine Ecosystems in Sri Lanka Integrated into Sustainable Development Planning, IUCN, [GEF Project Financing: \$ 2,656,194] [GEF ID 10552]**

✓ *Canada Comments*

- Canada supports this project but shares two notes of caution:
  - 1) In the COVID context, there is uncertainty about the state of public finance in Sri Lanka, with the likelihood of Sri Lanka defaulting on debt repayments. This situation will have an impact on the government's ability to sustain improved protection of protected areas (this is in reference to the statement that "Integration into government activities will provide for sustainability");
  - 2) The agenda of the newly elected government with regards to the environment is unclear. It is difficult to assess whether the protection of biodiversity will be given priority. However, there is a high level of public awareness (NGOs and media) on this issue, with public pressure in favor of conservation policies.
- The UNDP has identified that loss of biodiversity is an important issue in Sri Lanka, with a Red List Index value of 0.574 (from 0 – all species on the IUCN Threatened Species are categorized as extinct, to 1 – all species categorized as least concerned). Sri Lanka is deemed to be the 6th most vulnerable country to Climate Change, while contributing only 1.1 M tons per capita of CO<sub>2</sub> annually. There are strong arguments that support the inclusion of Sri Lanka as a priority country under the GEF and other regional or global projects could benefit the country. We note that Sri Lanka could be considered for inclusion in projects such as FAO's Food Systems, Land Use and Restoration (FOLUR) Impact Program 3rd Addendum (GEF ID #10726) (p. 14, para 39-45). This year, the GEF is expected to approve the extension of FOLUR to Madagascar. A similar case could be made for Sri Lanka, which is listed as one of 25 Global Hotspots for Biodiversity.

✓ *Germany Comments*

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

- Germany requests that the overall project approach, planned activities, outcomes and outputs are revised to reflect available time, human and financial resources. The overall project approach, especially under component 1, seems extraordinary broad and comprehensive. Given the allocated timespan for the project as well as the planned budget (especially through in-kind contributions), it seems unfeasible that the project can be implemented as planned.
- In addition, Germany request that exact sources and amounts from private sector sources are identified and that the scope and budget of the project is adjusted accordingly. The project proposal is based on a significant amount of co-financing from a large number of sources of co-financing. It is however not clear whether this co-financing has actually

been secured. It seems that especially the co-financing from the private sector has not yet been identified. In addition, the amount of co-financing required from the private sector seems unreasonably high. We are therefore not convinced that private sector companies will be able to contribute such amounts.

✓ *Norway/Denmark Comments*

**General comments:**

- We are very positive to projects involving increased investments in environmental preservation in Sri Lanka, and appreciate the proposed project's clear focus on preserving biodiversity and mainstreaming natural capital assessments in the country. Working with financial institutions and government policy makers focusing on natural capital management is an ambitious and, in some way, innovative approach, and it will be very interesting to follow the progress.
- The project appears to align well with the current government's priority areas, as outlined in the policy document "Vistas of Prosperity and Splendour," including its emphasis on protecting forest cover, rivers, streams and wildlife.
- However, despite the government's policy focus on the areas targeted by the project, insufficient resources are currently being dedicated to follow up issues of environmental preservation and biodiversity. It will be important to emphasize change also at higher levels of the government administration if the NCAA/SEEA/EEA approaches are to be mainstreamed into the planning processes.
- While much of the project's contribution from the Government of Sri Lanka are in the form of in-kind contributions of staff time and resources, how will IUCN work to ensure that there is sufficient resource allocation on the part of the GoSL, in terms of both human and financial resources, to follow up on the commitments?
- We appreciate the project's bottom-up approach and its ability to involve a multitude of stakeholders in the assessments. We also appreciate the emphasis on being able to quantify not only biodiversity benefits but also negative pressures on the natural environment from development and human actions.
- It is also commendable that the project aims to build on existing efforts and that synergies are envisioned with other projects, such as those funded by GCF and GEF6.
- It is a bit unclear exactly how the project will draw on global experience (and how that is defined) on co-management of nature-based businesses and ecosystem-based approaches in quantifying and sharing benefits. This should be explained in more detail for better overview and it would enable identification of possible synergies with other initiatives in the same thematic area.
- The project envisions significant financial contributions from the private sector, and particularly the tourism sector. It also recognizes as a risk that post-Covid-19 recovery may take significantly longer than expected. We therefore question whether the planned contributions from the private sector will be able to materialize themselves when planned. The tourism sector is currently harboring significant debt and will need to dedicate much of its earnings to debt service before being able to contribute to other efforts.

- The project’s recognition of the different use and impact of the natural environment by men and women is important. However, it will be important to also consider the gender dimension during project implementation and in the interaction with local communities.
- Existing challenges relating to corruption in relation to land allocation and tourism developments also need to be taken account of. While the government now appears to give emphasis to combating the commercial exploitation of protected areas, and judgements have been passed where lands have to be restored, these are still relatively new developments, and the risks of corruption should be considered. We believe the project would benefit from having a corruption risk assessment included in the project document identifying the risks, where the responsibility lies and identify relevant mitigation measures.
- It is positive that the project will focus on safeguards to ensure the sustainability of conservation areas and the livelihoods of coastal groups depending on the resources available in the coastal areas. However, the PIF document does not include any information or description of the human rights situation in Sri Lanka. Considering recent development in the country there is an indication of a strong need to emphasize the importance of including the human rights principles in the dialogue with government authorities in Sri Lanka.

**Specific comments:**

- It should be mentioned that another GEF project (10069 FAO is the GEF-agency) will be implementing a five-year project starting in 2021 in 8 countries part of the Bay of Bengal Large Marine Ecosystem and IUCN is one of three executing agencies. Sri Lanka is one of the countries and a focus area in the Bay of Bengal project will also be the Puttalam Lagoon. The Bay of Bengal project will also use Management Effectiveness tracking with METT, the same as in this project.
- IUCN should, together with FAO and the government authorities in Sri Lanka, coordinate between the projects to avoid any overlap and identify possible synergies. Also, the Bay of Bengal project will work in the Palk Bay area, but on the Indian side of the Bay. Again, IUCN and partners should coordinate and inform each other in order to ensure coherency among efforts to improve the management of coastal and marine resources in the Palk Bay, including the southeast Palk Bay.
- Often the capacity within government authorities is limited and that is one of the reasons why plans developed are not properly absorbed in the national systems, I.e., not used or applied. Donors should take a responsibility and contribute to lowering the workload by coordinating their initiatives to the degree possible.
- It is mentioned that Sri Lanka “tried Natural Capital Accounting approaches to establish a “Green Accounting System” for the “System of National Accounts (SNA)” but it was not mainstreamed into decision-making nor national budgets.” How will this project make use of lessons learned from previous efforts? At which level has the commitment to this project been made and from all involved stakeholders?
- We recognize that efforts have been made to simplify the project and its results framework. However, are the methodologies that are now suggested sufficiently simple to be followed up by local-level officials, also beyond the project’s lifetime?

- It is positive that the project uses a community involved multi-sector multi-stakeholder approach in biodiversity mainstreamed planning and implementation. However, it should be further elaborated how the project will meet the needs of the groups described as “traditional fishermen and people” in the PIF document, ensuring the safeguarding is present in all activities during implementation. How will the project integrate the Do-no-harm principle?

✓ **United Kingdom Comments**

*For the United Kingdom comments below, an initial agency response has been provided and can be found in the list of documents specific to the project in the GEF Portal.*

- How will the host government will be informed about the programme and how is the implementing partner chosen?

**57. Venezuela: Integrated Management of Multiple Use Landscapes and High Conservation Value Forest for Sustainable Development of the Venezuelan Andean Region, FAO, [GEF Project Financing: \$5,329,452] [GEF ID 10678]**

✓ **Canada Comments**

- The focus on agroforestry is important and we are pleased to see its inclusion. Additionally, focusing on the sustainable production of commodities such as cacao in terms of reducing deforestation is critical in attempting to slow down deforestation rates in Venezuela.

✓ **France Comments**

Specific attention:

- Regarding the project GEF ID 10678 in Venezuela: while recognizing the importance of a sustainable cocoa and coffee production, we are concerned about the governance standards observed in this country, especially with regard to international aid. This is why we insist that this project be subject to robust monitoring of the use of the allocated funds.

✓ **Germany Comments**

Germany welcomes the well thought out proposal and particularly the significant government support and commends the inclusion of various government agencies and programs the proposed project intends to strengthen. However, there some section that would require strengthening.

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

- Germany requests to revise project components as to further detail how local communities and drivers of degradation are addressed. The Program lists a variety of activities but looks rather generic in various aspects, lacking a specific focus derived from the circumstances in the program area/selected communities. For example, it is unclear how component 3 could realistically create a price premium for sustainability or establish co-investment schemes in the current difficult political and economic

circumstances. Linking it to established supply chains would be an even bigger challenge (see private sector engagement)

- Given the emergency it's unrealistic that the project could deliver on addressing food shortages induced by the COVID19 pandemic. The project plans to develop a training program and implementation of home gardens with the aim of producing different nutritious foods to meet household needs. However, the risks and local circumstances are not sufficiently addressed.
- Section 7 – Innovation: Given that improving sustainability and productivity in small scale coffee and cocoa farming has been tried in various countries, it is unclear how exactly this qualifies as an “innovative approach”. We request to further detail the projects additionality and innovation, as well as engage with similar projects in the region to build on existing knowledge.
- Private Sector involvement: given that the coffee and cocoa value chains are important components, the project lacks detail on how productive engagement can be achieved. Price premiums or access to export markets requires direct links to the private sector and identification of potential partners. We request to re-elaborate this section and provide a detailed private sector engagement plan.
- The risk assessment does not reflect the difficult political and economic circumstances in Venezuela – the risk ratings should make clearer reference to the political context and detail both mitigation measures and potential consequences.

✓ **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.*

Tropical forest-related programs (GEF ID #10726, 10689, 10678, 10718, 10688):

- We welcome these important tropical-forest-related programs, especially as they relate to productive forest supply chains and landscape restoration, which are issues that require urgent global attention. We support a rigorous data-driven approach to this field, and wonder whether the focal agency on forest-related supply chain/ trade matters within the CPF and the main data provider for tropical forests to the FAO is involved i.e. the International Tropical Timber Organization (we only see the TFA mentioned). To better align with an inclusive multi-stakeholder approach, we request the involvement of specialist organizations/platforms as these with the relevant global data, expertise and networks to ensure efficient and effective approaches to relevant stakeholders and to reduce duplication of effort in the global arena. The organization also has relevant indicators and guidelines on legal and sustainable supply chains and forest landscape restoration related to tropical forests, which can help assess and measure impact of relevant projects.

✓ **United States Comments**

- While we believe that this project would have significant and positive regional impact, the current political instability is likely to hinder successful implementation.

- The proposed Theory of Change includes various components and an overarching objective. It would be useful to see short- and longer-term outcomes to help better define the project's trajectory.
- The proposal focuses on farmer support motivated by improved economic conditions driven by improved ecological and environmental agricultural practices. One of the largest risks to the success of the program is the volatile nature of the raw goods market. We are concerned about the level of risk this component poses, and would like to see additional information on the mitigation strategies.

## MULTI-TRUST FUND

### 58. Benin: Strengthening Human and Natural Systems Resilience to Climate Change through Mangrove Ecosystems Conservation and Sustainable Use in Southern Benin, FAO, [GEF Project Financing: \$ 2,689,726] [GEF ID 10166]

#### ✓ Canada Comments

- It is important to take into account short-term issues (COVID-19) and long-term concerns (adaptation to climate change) and with a view to improving the economic and environmental resilience of the most vulnerable populations in these projects.
- Canada believes that the joint attention of FAO Forests and FAO Food Security initiatives will be central to success of this approach.

#### ✓ France Comments

Coordination with other projects, for instance financed by the FFEM:

- This project implemented by FAO should be coordinated with the WACA program, which is co-financed by the WB and, for its nature-based solutions component, by the FFEM. It should also be coordinated with the [mangrove project in Costa Rica and Benin](#) (methodology/governance) supported by the FFEM, knowing that the Ministry of the Environment of Benin is the common interlocutor and that the project areas must be identical or very close, given the small extent of mangroves in Benin.

#### ✓ Germany Comments

Germany welcomes this project, which aims to resilience of mangrove ecosystems and their dependent agricultural, forestry and fishery communities in Southern Benin. The community-centric ecosystem conservation approach to increase the resilience of mangroves and livelihoods depending on them is promising. This project has the potential to ensure the resilience of the two target areas while also linking related and complementary approaches in other areas. Synergies with and co-financing through several on-going projects have also been identified. Furthermore, Germany appreciates the consistency with national strategies and clear linkages to NAPA, INDC and the Low Carbon and Climate Resilient Development Strategy.

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

- GCF co-financing: Germany welcomes the high volume of co-financing. Among others, the proposal refers co-financing from a GCF-financed initiative (\$30,000,000) Germany shares the view of the GEF Secretariat (PIF Review) on the importance of including more detailed explanations on what that project is financing exactly.
- COVID 19 strategy: Germany appreciates that COVID-19 addressed in its risk section as well as project design. Still, Germany shares the view of the GEF Secretariat (PIF Review) that a strategy or action framework for the pandemic should be added.
- Vulnerability assessments: Germany welcomes the preparation of in-depth vulnerability studies planned under component 1 of the project. However, Germany recommends highlighting how the results of these studies will be used in strengthening knowledge availability, awareness and decision-making support under component 3. In addition, the vulnerability studies should take into consideration the cross-border effects of measure in the coastal zone in the region.
- Key stakeholder: Germany welcomes the implication of the National Fund for the Environment and Climate (FNEC) in the Steering Committee of the project since FNEC plays an important role in mobilizing national and international funds (e.g. Adaptation Fund, Green Climate Fund). In this frame, FNEC is supporting local actors in mangrove related activities. It is recommended that the role of FNEC as a key stakeholder is strengthened in the frame of the project especially with regard to capacity development activities A stronger implication of FNEC in the project allows furthermore for better identifying interlinkages with ongoing and planned small- and large-scale projects as well as with future call for proposals by FNEC in order to upscale project activities.
- Gender: Germany welcomes that the gender gap has clearly been identified with regards to social and economic disadvantages. However, no link has been shown between gender and adaptation to climate change. Germany recommends that the gender aspect is stronger included in the vulnerability studies and the identification of alternative nature-based livelihoods under component 2 in order to strengthen gender-empowering alternative livelihoods.
- Cooperation with other projects: Germany welcomes the consideration of the WACA project in the project proposal to take into consideration the cross-border nature of interventions in the project zone. However, Germany recommends that greater consideration be given to what mechanisms are available or needed to ensure transnational exchange and decision-making with implication of the relevant stakeholders on national and local level to increase the effectiveness of the activities proposed by the project.
- Conceptualisation of biodiversity: Germany appreciate the biodiversity approach to increasing resilience. However, in the proposal the term “biodiversity” is used in a general matter. It is not clearly defined which species are looked at specifically in the frame of the project. Therefore, Germany recommends listing the species that will be looked at by the project to evaluate its contribution to biodiversity conservation.
- Project Area: Germany appreciate the selection of the project areas. The proposal mentions the Mono Delta Biosphere that overlaps partly with the project area. Other than this, the biosphere reserve created in October 2020 in the Basse Vallée de l’Ouémé

should be taken into account as well in the project design to analyse potential overlaps with project sites and to analyse endangered species in this site to be taken into account.

**59. Benin: Achieving Land Degradation Neutrality and Securing Climate Resilience in the Niger Valley, Alibori Sud-Borgou Nord-2KP and Zou-Couffo Agricultural Development Areas of Benin, UNDP, [GEF Project Financing: \$4,566,667]] [GEF ID 10688]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Canada Comments**

- It is important to take into account short-term issues (COVID-19) and long-term concerns (adaptation to climate change) and with a view to improving the economic and environmental resilience of the most vulnerable populations in these projects.
- If designed and executed effectively, Canada believes that this project will enable Benin, one of the most vulnerable countries to climate change, to develop more climate-smart production systems and infrastructure as well as strengthen ecosystem and biodiversity protection. These outcomes will be important to help the country overcome projected climate impacts and threats related to drought, desertification, and floods, which are significantly affecting the availability and productivity of agricultural lands. This is problematic as a significant proportion of Benin's population is dependent upon agriculture, most of which is rain fed and small scale. This project will therefore not only help to reverse land degradation and enhance Benin's climate resilience, but also improve livelihoods for communities in the target areas. Capacity building activities will also generate stakeholder awareness and support agricultural land managers in scaling up climate risk-informed land management approaches in the agricultural development areas.
- Canada notes that STAP has welcomed this proposal and highlights minor issues to be considered during the project design. Assuming the appropriate steps are taken to ameliorate the components of the project that are currently lacking, Canada supports this proposal and the recommendation of the Secretariat.

✓ **Germany Comments**

Germany acknowledges, that the proposal provides useful content to the land degradation neutrality (LDN) process, which Benin initiated. In this regard, the project may provide options to strengthen synergies between the sectors land and forestry and contributes to improved framework conditions for climate adaptation and sustainable land management.



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

- Germany requests a final theory of change and a final work plan with budget overview. In particular, Germany requests to develop a more detailed planning of activities to make use of synergies with other related projects identified. In this regard, the project may contribute to an upscaling of climate adaptation and sustainable land management activities of the GIZ Project “Soil protection and rehabilitation for food security, Benin”
- Germany recommends taking into account the security situation in project areas close to the northern and northeastern border, when it comes to estimate potential losses of impact on project areas due to the conflictual situation between agriculturalists and pastoralists. Regarding the calculations on carbon gains, Germany recommends including permanence and additionality perspectives. It would be beneficial to include the training concept in existing structures (e.g. to make use of synergies and multiplication options).

✓ 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.*

Tropical forest-related programs (GEF ID #10726, 10689, 10678, 10718, 10688):

- We welcome these important tropical-forest-related programs, especially as they relate to productive forest supply chains and landscape restoration, which are issues that require urgent global attention. We support a rigorous data-driven approach to this field, and wonder whether the focal agency on forest-related supply chain/ trade matters within the CPF and the main data provider for tropical forests to the FAO is involved i.e. the International Tropical Timber Organization (we only see the TFA mentioned). To better align with an inclusive multi-stakeholder approach, we request the involvement of specialist organizations/platforms as these with the relevant global data, expertise and networks to ensure efficient and effective approaches to relevant stakeholders and to reduce duplication of effort in the global arena. The organization also has relevant indicators and guidelines on legal and sustainable supply chains and forest landscape restoration related to tropical forests, which can help assess and measure impact of relevant projects.

**60. Mali: Climate Security and Sustainable Management of Natural Resources in the Central Regions of Mali for Peacebuilding, UNDP, [GEF Project Financing: \$2,639,726] [GEF ID 10687]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit*

*and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Germany Comments**

Germany welcomes the proposed measures as they are highly relevant. Notably, in order to strengthen the private sector, electrification is fundamentally important, particularly mini-grids in remote areas. However, some of the approaches mentioned already exist, which calls for an extensive scoping mission to prevent overlaps.

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

- We request that security conditions should be referenced more strongly in the risk management section. There is a possibility that the current security condition might hinder project implementation, especially in the Mopti region. As such, questions on the sustainability and the possibility of field implementation arise. Risk mitigation measures should be detailed and planned before implementation starts.
- We suggest to consider whether the installation of solar-powered mini-grids could be included in project activities. It is not one of the measures listed, despite it having a great potential for mitigation, adaptation (reduction of firewood felling) and overall improvement of living conditions, including private sector development.
- We request to revise some issues in the presented analysis on climate and land degradation in the first part:
  - Rainfall has been increasing again since 1990 at the latest, but with great variations.
  - Land degradation does not seem to have played a major role for some time. Deforestation rate of 500,000 ha /year is being questioned.
  - The decrease in the flow of the Niger River is also controversial. We do not expect a further decrease and the only flow station that seems reliable is Koulikoro, all others have been changed / relocated over the years.

✓ **Norway/Denmark Comments**

- This project is highly relevant and important for Mali. The management of natural resources, including access, is an important aspect of peacebuilding between different ethnic groups and communities (nomads / cattle farming versus resident farmers) in Mali which is in conflict precisely due to competition for access to natural resources.
- The description of the context is assessed to be correct especially related to the climate related challenges which have led to conflicts between ethnic groups in local communities.
- The different barriers are well described, and the solutions suggested are assessed as adequate and realistic.
- The Danish embassy had the opportunity to exchange with UNDP about this project and very much supports it. Its analysis and frame of the complex interlinkages between issues is precise and much appreciated. They are furthermore support the approach, which is

similar or complementary to what the Danish embassy is currently funding through WFP and will also be funding in a project through PATRIP Foundation among others.

- Strengths:
  - Emphasis on partnering with state and local authorities. This is neglected and a prerequisite for durable advances.
  - The mix of access to resources, livelihoods and governance / cohesion is pertinent.
  - Praise to the inclusion of gender. Must be maintained as this is a relevant dimension for all aspects of the proposed interventions.
- Risks:
  - Emphasis on partnering with state and local authorities. It is the central question as return of the state and local authorities is not something UNDP can do much about. Will require continuous dialogue with the governments (national and local) and probably collective push / alliance with other partners of Mali.
  - Risk of duplication and overlap. The targeted regions are currently the focus of interventions throughout to HDP-nexus in Mali – thus coordination and cooperation within and outside UN will be of outmost importance throughout the UNDP nexus.
  - Security. The regions suffer daily from security incidents and as an example humanitarian staff is regularly kidnapped for shorter or longer durations. This entails many risks incl. on implementation and monitoring.
  - There is currently an ongoing Danish and Norwegian financed project “Danish Regional Sahel Peace and Stabilisation Programme” that has similarities with the GEF proposed project and we would therefore encourage coordination and collaboration to ensure there is no over-lap and make the most of potential synergies.

## SMALL GRANTS PROGRAMME

- 61. Global (Afghanistan, Argentina, Bahamas, Belarus, Belize, Bhutan, Botswana, Burkina Faso, Cabo Verde, Cameroon, Central African Republic, Colombia, Congo DR, Cote d'Ivoire, Cuba, Dominican Republic, Eritrea, Eswatini, Ethiopia, Gabon, Gambia, Guinea-Bissau, Jamaica, Liberia, Madagascar, Mali, Micronesia, Mongolia, Morocco, Myanmar, Niger, Nigeria, Panama, Senegal, Seychelles, Sierra Leone, Somalia, South Africa, St. Kitts and Nevis, St. Lucia, Tanzania, Tunisia, Turkey, Uganda, Venezuela, Togo, Tonga, Uzbekistan, Vanuatu, Yemen, Zimbabwe, China, Palau, Nepal): GEF SGP 7th Operational Phase - Strategic Implementation using STAR Resources Mainly in LDCs and SIDs (Part 3), UNDP, [GEF Project Financing: \$ \$43,235,008][GEF ID 10655]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being*

*completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Australia Comments**

*The below comments from Australia 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.*

- Regarding the Global Project on Strategic Implementation using STAR for the Small Grants Program, could you please highlight which SIDS will be participating?

✓ **Canada Comments**

- Canada would like to note that the project is not tagged to Biodiversity Rio Marker in PIF (only climate change mitigation 1 and adaptation 1).

## **NON-EXPEDITED ENABLING ACTIVITY**

### **62. China: Enabling China to Prepare Its Fourth National Communication, and Biennial Update Reports on Climate Change, UNDP, [GEF Project Financing: \$ 4,566,210] [GEF ID 10707]**

*In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, as well as the independent, risk based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the management responses and note them in the endorsement review sheet that will be made available to Council during the 4-week review period.*

✓ **Canada Comments**

- Projects such as this one, that support non-Annex I Parties meet their UNFCCC obligations by building institutional capacity for data collection and management, as well as monitoring and reporting on the implementation of actions, are well received by Canada.

✓ **Germany Comments**

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

- Germany welcomes this project but suggests to make the following changes: Increase transparency on reported data/information; reduce inconsistencies between different reporting years; clarify relation with other existing MRV systems (i.e. historic emission data collection for the preparation of the ETS).
- We suggest to consider the consistent use of the most recent IPCC guidelines, also for the recalculation of inventories to ensure data consistency. According to the PIF, China

intends to use 1996 IPCC guidelines for the national GHG inventories for years 2017 and 2018. Only for the year 2020 China intends to use 2006 IPCC guidelines.

- The section on the domestic MRV system could be explored in more detail: The PI refers to the domestic MRV system to support the preparation of the NC and BUR. However, little information on details is provided.
- We note the limited amount of co-financing compared to similar GEF proposals for similar projects in other countries (e.g. India and Indonesia). Further avenues to ensure adequate co-financing and project sustainability should be explored.
- We further suggest to engage with the following projects:
  - Capacity Building to support the establishment of a National Emission Trading Scheme (ETS) in China (Extension phase 2020-2022: Sino-German Cooperation on Emissions Trading Systems, Carbon Market Mechanisms, and Industry related N2O Mitigation) The project supports the establishment and further refinement of the Chinese national ETS, including support on MRV procedures in accordance with the requirements of international reporting (relevant rules, IPCC, NDC). ([https://www.international-climate-initiative.com/en/details/project/capacity-building-to-support-the-establishment-of-a-national-emission-trading-scheme-ets-in-china-11\\_I+002-319](https://www.international-climate-initiative.com/en/details/project/capacity-building-to-support-the-establishment-of-a-national-emission-trading-scheme-ets-in-china-11_I+002-319))
  - Initiative for Climate Action Transparency (ICAT): ICAT builds up capacities to strengthen national MRV systems and establish institutional arrangements. At national, regional and global levels, the project finances activities that have an immediate and long-term impact and improve the administrative, legislative and institutional MRV infrastructure in developing countries. ([https://www.international-climate-initiative.com/en/details/project/initiative-for-climate-action-transparency-15\\_I\\_252-453](https://www.international-climate-initiative.com/en/details/project/initiative-for-climate-action-transparency-15_I_252-453))

✓ **Norway/Denmark Comments**

**General comments:**

- The project is highly relevant to China especially in the context of China's recently announced target to aim for carbon neutrality in 2060 and to achieving the objectives of the UNFCCC and the Paris Agreement.
- The project will enhance China's understanding of the appropriate policies to enable proper planning and implementation of climate change mitigation actions.
- There is a continued need for improved data quality and data sets for emissions from different sectors, and this project will contribute to that. It is positive that the baseline for the project partly builds on recent analysis from the UNFCCC secretariat. The project will also provide relevant information on GHG emissions and sinks in Hong Kong and Macao Special Administrative Regions.
- We welcome that the project involves different ministries such as the Ministry of Ecology and Environment, the Ministry of Finance, the Ministry of Science and Technology, the Ministry of Agriculture, etc. This sectoral coordination shows ownership of the project by the government. The project partners could however be challenged to

further define the main parties for the project steering committee and other entities for project implementation and management.

- We welcome the fact that the project will implement measures to ensure that women gain equal opportunities to engage in the design and implementation of the project activities. It is also positive that the National Circumstances chapter of the 4NC will include gender-disaggregated data.
- It is positive that the project will build on findings and recommendations from previous NC and BUR work. For example, the project will consider the recommendations on transparency identified in International Consultation and Analysis (ICA) of BUR1 and BUR2.
- China will use the 2006 IPCC guidelines in the preparation of the National GHG Inventory for the BUR4. Considering that the IPCC has adopted the “2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories”, why will the 2019 Guidelines not be used?
- The national GHG inventories for years 2017 and 2018 will be prepared using 1996 IPCC guidelines, and the GHG inventory for the year 2020 will be prepared using 2006 IPCC guidelines. What is the reason for distinguishing the use of Guidelines among GHG inventories?
- In the project proposal, it is stated that the 4NC will cover the same sectors as the 3NC, namely: i. energy, ii. industrial processes, iii. agriculture, iv. land-use, land-use change and forestry, and v. waste. Has the possibility of including new sectors for 4NC been assessed?
- Will the same five sectors covered in the Fourth National Communication be analyzed in the assessment of Adaptation and Climate Change?

**Specific comments:**

- China’s national carbon market, expected to become operative shortly, is mentioned in the project document and has potential to strengthen the quality of data also in China’s greenhouse gas inventory. The project partners could be challenged on how to integrate these emissions data in the work on the inventory as the national carbon market gradually will expand to new sectors.
- The financing proposed for this project is \$4,566,210. This implies a reduction from the amount approved for the project GEF ID 4882 which allocated \$7,280,000 to cover the same type and number of reports and led to the preparation of China's Third National Communication and first two Biennial Update Reports. What is the reason for this reduction?
- The project states that the draft reports of the 4NC and BUR3 and BUR4 will be presented to stakeholders for their review and comments. We don’t find CSOs in the list of stakeholders provided on page 21 of the funding proposal. Will CSOs/NGOs be included in this project?