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To: Monique Barbut
Chief Executive Officer and Chairperson
Global Environment Facility
Email: gcoordination@TheGef.org

Subject: Comments by Germany on Work Program November 2011

Dear Ms. Barbut,

Germany approves the Work Program May 2011. Attached, please find our comments on several of the PIFs and PFDs with the request to take these into account during the drafting of final project documents.

We welcome every opportunity in which close cooperation between GEF projects and German bilateral cooperation as well as cofinancing agreements are feasible. However, we are concerned that indicative cofinancing by German bilateral cooperation and its implementing agencies such as GIZ and KfW is sometimes mentioned in the PIFs without proper prior consultation (e.g. in this Work Program in project 35. Sustainable Forest Management and Multiple Global Environmental Benefits (Guatemala), GEF ID = 4479). While we do understand that a formal letter for the provision of cofinancing is required only at the stage of the final project document, we expect that initial consultations between the GEF Agency and the potential provider of cofinancing have taken place and have been documented informally in writing before the PIF is submitted to GEF-Sec.

With kind regards,

Matthias Seiche
on behalf of
Frank Fass-Metz

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

1. Global - UNEP - Support to GEF Eligible Parties (LDCs&SIDS) for the Revision of the NBSAPs and Development of the Fifth National Report to the CBD – Phase 1. GEF ID = 4513

Please see comments below on GEF ID = 4623.

2. Global - UNEP - Support to GEF Eligible Parties (LDCs & SIDS) for the Revision of the NBSAPs and Development of the Fifth National Report to the CBD – Phase 2. GEF ID = 4623

We would like to emphasize that in the present proposal in general, and specifically under its “Component 2: National Targets, Principles & Priorities of the Strategy”, the Nagoya Protocol on Access and Benefit-sharing (ABS) needs to be taken duly into consideration. The ongoing ratification and implementation processes of the Protocol need to be aligned with and integrated in the revision of the NBSAPs. Processes under the NBSAP revision, such as stocktaking of relevant policies, stakeholder identification / consultations, CHM development etc. should be designed and carried with components that address the provisions and specific requirements of the Nagoya Protocol as well as particular actors relevant for its implementation (e.g. Intellectual property offices, private sector, R&D institutions, etc.).

This “integrated approach” would allow for creating synergies and support mainstreaming of ABS issues into the different policy areas that are relevant for the mutually supportive implementation of the three objectives of the CBD – and not only targeted on conservation and sustainable use (for example, ABS as a potential mechanism to finance biodiversity conservation and help implementing the Aichi targets).

3. Angola - UNDP - Expansion and Strengthening of Angola’s Protected Area system. GEF ID = 4589

The final project proposal should elaborate more clearly on the following issues:

The capacity development strategy should be described more clearly. The question arises how a significant expansion of the protected area system in Angola can realistically be managed in view of the current low institutional and human resources base. To what extent will regional centres of excellence and training institutions be used to address existing capacity building needs for rangers and managers of protected areas (e.g. Southern African Wildlife Centre)?

The proposal should elaborate to what extent the Angolan legislation on forests, wildlife and protected areas allows for the participation of local communities in co-management of protected areas and wildlife, and how the project will address policy gaps taking into consideration benchmarks established in the context of the KAZA Transfrontier Conservation Area (communal conservancy approaches and game management areas). The project should establish mechanisms for exchange and learning from the rich experience of neighbouring countries. The links and synergies with sub-regional and regional programmes and structures (KAZA Secretariat; SADC Secretariat) should be strengthened.

It is emphasized that the project will have a strong focus on protected area finance, taking into consideration that MINAMB and the Forestry Development Institute have one of the lowest budgets in Africa. The project proposal should provide details on the measures that will be taken to identify new funding sources for the PA system.

4. Bolivia - FAO - Conservation and Sustainable Use of Agro-biodiversity to Improve Human Nutrition in Five Macro Eco-regions Biodiversity Documents. GEF ID = 4577

The project aims to conserve and use agrobiodiversity in a sustainable manner to improve human nutrition in five macro-ecoregions. It is generally in line with current activities of the German development cooperation in the field of agricultural development and natural resource management in Bolivia.

Germany suggests to concentrate in BD 2 (measures to conserve and sustainably use biodiversity incorporated in policy and regulatory frameworks) on the implementation of already existing laws which are favorable for the conservation and sustainable use of agrobiodiversity. These laws do already exist; the problem is their implementation and the monitoring and evaluation of the implementation.

An important additional step to achieve outcome BD 2 would be to build up platforms with the participation of the private sector, the civil society, non-governmental organizations, and representatives of the government in order to coordinate the different activities in the field of agrobiodiversity.

5. Botswana - UNDP - Improved Management Effectiveness of the Chobe-Kwando-Linyanti Matrix of Protected Areas. GEF ID = 4544

The Chobe-Kwando-Linyanti Matrix of protected areas play an important role in the KAZA transfrontier conservation area. Therefore it is recommended that:

The KAZA Secretariat should also be seen as key stakeholder (B.5.), and the final project proposal should elaborate on mechanisms for cooperation at the regional and transboundary level.

Coordination with other related initiatives: German Financial Co-operation (KfW) is a key donor at KAZA level with support including infrastructure development in the Chobe National Park. Within the efforts of donor coordination the implementing agency should actively seek contact in order to ensure synergies and complementarities. Such coordination will also be important with regard to socio-economic development measures linked to nature-based tourism and sustainable utilization of natural resources.

At the SADC level, German Technical Cooperation (GIZ) provides support to the implementation of regional programmes, including the SADC Regional Fire Management Programme and SADC Programme on Transfrontier Conservation Areas. It is recommended that in the final project design reference is made to these regional programmes and that regional authorities are consulted for improved coordination and cooperation.

The risk assessment should consider the risk of climate change on project objectives.

7. China - FAO - Securing BD Conservation and Sustainable Use in Huangshan Municipality Biodiversity. GEF ID = 4526

Component 1- policy, planning and institutional arrangements. In many projects the design and formulation of policies is one of the main objectives. However, it is not only policy formulation but rather the implementation of the policy that needs to be taken care of by the project. Here we suggest including activities and indicator(s) that show that policy implementation is being tackled. One activity could be the formulation of guidelines on how to implement the relevant policy.

Key stakeholders. We suggest including the Department of Agriculture at municipal level as one of the stakeholders when it comes to discussions with local communities and rural landholders on developing sustainable/alternative livelihood activities.

Sharing Benefits from National Scenic Reserve (NSR) and Protected Areas (PA). In many cases income from the National Scenic Reserve is not shared with local communities living in the reserves or protected areas. This has many reasons; amongst others are strict budget allocations and/or administrative hurdles. The project covers this aspect partly by providing alternative/system livelihood options. However, the project should look into possibilities and ways of how communities could be allocated a certain percentage of the annual income from the national scenic reserves as direct benefit/compensation for protection and effective conservation of biodiversity. One possibility would be to design an agreement with local communities, specifying their task and responsibility for protection and conservation of biodiversity in those specific areas. The amount can be used for village development projects.

10. Jordan - UNEP - Mainstreaming biodiversity conservation in tourism sector development in Jordan. GEF ID = 4586

A large portion of the suggested project approach seems to depend on co-financing agreements. It should be made clearer to what extent of certainty these agreements will materialize and which components of the proposal would be prioritized in case the budget target will not be met.

The project title suggests “mainstreaming” biodiversity conservation is the main goal of the project, implying that it specifically targets the country as a whole. However, there are only few references in the proposal that refer to activities relating to mainstreaming in the sense of evaluating lessons learned and distributing knowledge gained by project activities across Jordan. We strongly suggest that the project approach include a significant (and budgeted) component on the distribution of knowledge gained from the project, ideally not only within Jordan itself but also in exchange with other conservation and protected area projects facing similar challenges across the world.

Coordination with other related initiatives: Reference to page 10 (global environmental benefits): *“By promoting environmentally-friendly regulations and guidelines in the tourism sector the project will also contribute to the reduction of solid wastes and wastewater discharges and will reduce extensive abstraction of water ...”*. In this regard, it is recommended to consider the lessons learned by a Public-Private-Partnership between GIZ and the Hans Grohe AG in grey water recycling at the “Dead Sea Spa Hotel”.

12. Global - UNEP - Umbrella Programme for National Communication to the UNFCCC GEF ID = 4498

Germany welcomes the Umbrella Programme for National Communication to the UNFCCC and the planned efforts to help the 22 identified SIDS and LDCs to enhance ownership and improve capacity for the production of national communications. The Consultative Group of Experts (CGE) has documented extensively the challenges and risks for NA1 countries seeking to fulfil reporting requirements under the convention, and the UNEP Umbrella Programme should frame its proposal to more completely consider the specific challenges and recommendations set forth by the CGE in the documents FCCC/SBI/2011/5/Rev.1 and FCCC/SBI/2011/5/Add.2.

The CGE identifies several challenges that are not adequately addressed in the proposal, particularly in the section on risks. Please provide additional information about how the following challenges and potential risks could be managed:

Technical and Capacity Building Challenges: the umbrella programme seeks to “update and improve” GHG inventories; however, the issue of *how* data for GHG inventories can be improved needs to be addressed, e.g., the development of national emissions factors is one recommendation of the CGE. What can concretely be achieved in the context of SIDS and

LDCs where data is notoriously sparse or of poor quality? **Accessing data** is another issue: how will the programme help parties gain access to information that is often in the hands of the private sector?

Financial Challenges: one problem that the CGE highlights is the prohibitively high cost of consultants to carry out tasks for NatCom development, which in turn prevents the National Communication process from being sustainable in the long-term. UNEP proposes assisting parties to identify consultants; however, the cost of consultants and the CGE-cited rule against using GEF-funding to pay for civil servants to carry out work is not addressed. What are options for balancing the need for external technical experts with increasing local capacity to manage technical aspects? Are there long-term options for increasing national ownership?

General observation on NatCom Challenges: lack of ownership in the NatCom process is a key challenge. Until parties see the reporting requirement as a useful tool for guiding decision-making rather than a burden under the convention, the process will remain unsustainable. The Umbrella Programme is correct to integrate the NatCom findings into national development processes. Please provide more information about how such an integration would work.

14. Regional: Asian Sustainable Transport and Urban Development Program. GEF ID: 4638

The objectives and outcomes outlined in the PDF seem well designed to achieve the desired GHG emission reductions in urban transportation.

The project outputs “policy support for low-carbon transport and urban systems and technologies” as well as “improved NMT access” do not fit under the AVOID section under Programme Component 1. These outputs refer to SHIFT to more sustainable modes, without necessarily reducing the need to travel. They should therefore be put under Program Component 2, where reference to NMT is already made.

Under Program Component 2 (SHIFT), possibilities for fostering NMT beyond the access to transit stations should be explored more deeply. NMT should have a higher overall priority, as it is the least GHG emitting mode (zero emissions!). In addition, the SHIFT component should explicitly refer to MAINTAIN, as in many developing cities the issue is rather to maintain the current high modal shares of NMT and public transportation.

With regard to knowledge sharing (component 4), the well established Sustainable Urban Transport Project (www.sutp.org) as well as the current GEF-funded project “Promoting Sustainable Transport Solutions for East African Cities” (GEF Sustran East Africa, <http://www.sutp.org/gefsustran/>) should be considered for knowledge sharing purposes.

17. Colombia- UNDP - Third national communication to the UNFCCC. GEF ID = 4619

Germany welcomes the proposal for Colombia’s Third National Communication. For the final project proposal, please expand consideration of different potential risks to address how specific problems faced in the first and second national communication processes will be addressed. Please also address how some of the typical reporting problems, such as availability and quality of data for GHG inventories, coordination between institutions to foster ownership of the national communication process (the PIF mentions a NatCom “team”, please describe the make-up of the team), as well as availability of technical expertise to perform the various functions, will be managed for the TNC. What steps will be taken to ensure continuity of processes in the future?

19. Suriname: Development of Renewable Energy, Energy Efficiency and Electrification. GEF ID: 4497

We support STAP comments in that an assessment of the cost-effectiveness and mitigation potential of different RE technologies should be performed before a decision is taken on which technologies are applied as pilot projects under component I and III. Such assessment should also consider the scaling-up potential of RE and EE technologies taking into account the national circumstances.

With a view to promoting a broad sustainable project impact, further project development should put more focus on how the pilot demonstration projects will lead to the adoption of clean technologies beyond the project boundary, i.e. across the country. The proposal to disseminate successful experiences, while indeed important, might on its own be insufficient as an upscaling strategy.

The project will contribute to the improvement of the enabling environment for private sector investment by putting in place a regulatory framework and by supporting techno-economic analysis of RE technologies. However, the proposal does not adequately consider the key role of the private sector as investor, technology supplier, plant operator or regarding maintenance of technologies. Further project development should therefore take a closer look at training and capacity development needs of the private sector in Suriname and include measures to address these needs. For example, there might be a need to train local banks on the specific benefits and challenges of RE and EE investment.

26. Regional - ADB/IBRD - Greater Mekong Subregion Forests and Biodiversity Program (GMS-FBP). GEF ID = 4649

We have concerns that the program with a high volume of funding and a quite short implementation period requires a significant capacity for coordination. The timing of the different projects under the program will be very important. How will the implementing agencies ensure the proper timing of the different projects and the timely implementation of the regional program? We therefore request, that all settings for implementing the national projects are well defined and in place before the regional project starts, to ensure that there is no delay for the regional project.

28. Regional - IBRD - MENA-Desert Ecosystems and Livelihoods Program (MEA-DELDP). GEF ID = 4620

The concept of «desert ecosystems» is not clearly explained. Is it about deserts being arid, but productive ecosystems and their degradation or does the project refer to drylands and desertification in a larger sense?

The project seems to focus on the local level, intending to provide for a network of demonstration sites. All countries concerned have long standing experiences in SLM practices (Morocco: GIZ and WB projects, Jordan: GIZ, WB, ACSAD projects, ...) We recommend to put more emphasis during the further elaboration of the project concept on the identification of best practices and strategies for upscaling them.

Algeria: Dryland agriculture depends on the North Sahara Aquifer, being a non-renewable overexploited water resource. Impact of the project on the NSA should be explored and explained.

Value chains for desert products are one action line. We recommend to further elaborate on certification, e.g. UNDP has developed a Fair wild certification for MENA countries that might be a good reference.

We recommend as well to further explore linkages with existing projects such as

1. GIZ : Regional Silva Mediterranea
2. GIZ : Adaptation au changement climatique, Morocco
3. FAO : Adaptation to climate change in forest ecosysteme, MENA

4. others

Please specify the key partners and focal points of the national projects. What is the role of the respective UNCCD FP?

30. Belize - IBRD - Management and Protection of Key Biodiversity Areas.

Multi Focal Area. GEF ID = 4605

The project focusses mainly on terrestrial key biodiversity areas (KBA) and forest management. Belize's marine and coastal ecosystems provide for much of the country's income (tourism, fishery) and cultural identity (reef recognized as World Heritage site) – but these are highly sensitive to human and climate change impacts. According to Belize's NBSAP, the negative influence of land-based activities is very marked and affects the program for Marine Protected Areas (MPA); thus integrated conservation and development approaches are needed. The multi-sectoral linkages for the integrated management of coastal resources are showing first results in Belize, but need to be consolidated and incorporated into the design of new measures.

The full proposal should therefore clearly identify how:

- Belize's approaches in Integrated Coastal Management (ICM) will be linked with the proposed forest/ terrestrial KBA management activities;
- Concrete synergies will be built with the World Bank / GEF project on the Mesoamerican Barrier Reef System (MBRS II).
- Integration in the greater regional context is planned, e.g. Mesoamerican Biological Corridor, SICA, and specifically in the context forest & climate change with the REDD Programme of the Comisión Centroamericana de Ambiente y Desarrollo (CCAD-GIZ).

35. Sustainable Forest Management and Multiple Global Environmental Benefits (Guatemala). GEF ID = 4479

The proposed project claims that more than 80% of the co-financing volume (i.e. more than 60% of the total project costs) is contributed by the "Dry Forest Project" of the German development Bank (KfW). We note that there is no agreement yet between UNDP (GEF-Agency in charge for the proposed project) and the KfW-program on this potential co-financing.

36. Honduras - UNDP - Delivering Multiple Global Environment Benefits through Sustainable Management of Production Landscapes. GEF ID= 4590

The proposed project aims at intensifying cattle production through sustainable land management practices and enabling favorable conditions regarding policies, markets and finance. Implementing the proposed methods such as planting of trees in pasture, zoning of cattle production, semi-enclosed management of cattle with fodder banks and cut and carry systems or pasture rotation, through a significant number of farmers are very demanding procedures and considered little realistic in the working regions in Honduras for the time, the financial setting and the concept of the project presented.

Market incentives through certified products aiming at better prices in Honduras (and Central America) are related to export products only. Often these are niche products of small farmer groups with only limited impact in area. The local consumer in Central America and especially Honduras does not show capability and willingness so far to reward investments in sustainability. Meat and dairy products in Honduras are principally for domestic consumption with only very limited destination for export.

Results of former KfW-projects in the Río Plátano Biosphere Reserve suggest that intensifying the production system for cattle ranching with increasing per area income leads to rising cattle numbers and does not lower the pressure on forest remnants or slow down the advance of the agricultural/ranching frontier without strong governance control. The nearly absence of state authority and the threats and shortcomings in terms of governance and management are the main reasons that the RPBR has been inscribed on UNESCO's World Heritage List in Danger again. The PIF does not show perspectives to improve this situation. We request that these risks are addressed in the final project document.

37. Kazakhstan - UNDP - Improving Sustainability of PA System in Desert Ecosystems through Promotion of Biodiversity-compatible Livelihoods in and Around PAs.

GEF ID: 4584

Especially in dry areas such as steppe, desert and semi-desert ecosystems, there are many apparent interlinkages and co-benefits between sustainable management of natural resources, biodiversity protection and adaptation to climate change. We would therefore recommend

- a) to elaborate more on linkages and co-benefits between components 2 & 3, between biodiversity and sustainable management
- b) to focus more on use and up-scaling of existing best practices of sustainable and decentralized management of natural resources in Kazakhstan, e.g. rangeland and forest management.
- c) to widen the project approach to include adaptation to climate change and specifically address aspects of Ecosystem-based Adaptation (EbA) in the Final Project Document, since steppe, semi-desert and desert ecosystem are especially threatened by climate change

Regarding Engagement of NGOs (page 9), Germany strongly supports a strong involvement of civil society organizations in the projects. We would emphasize that there are possibilities to engage NGOs in far more areas than Outputs 1.3 and 3.3.2.

German development cooperation has cooperated with the Association for Biodiversity Conservation in Kazakhstan (ACBK) in areas such as co-management approaches (Output 3.1.), biodiversity monitoring including GIS mapping and monitoring procedures and arrangements (Outputs 2.2, esp. 2.2.2. & 2.2.3) and is therefore aware that NGOs have reached very high levels of professional expertise in such activities. We would therefore recommend to extend the engagement of NGOs to other Outputs than 1.3 & 3.3.2. and specifically build upon existing experience in Kazakhstan, e.g. from the Altyn Dala Initiative.

38. Malawi - IBRD - Shira Natural Ecosystems Management Project. GEF ID= 4625

The activities and methodology envisaged to achieve the mentioned outcomes and outputs under each project component need to be elaborated more explicitly, e.g. with regard to the involvement of partners listed and community participation. Thus, in addition to the technical comments of STAP (date of screening: October 8, 2011), more specific reflections on activities and the methodology applied for each project component should be given in the final proposal and reflected in the ongoing reporting requirements.

39. Russian Federation - UNEP/EBRD, UNDP, IBRD - ARCTIC GEF-Russian Federation Partnership on Sustainable Environmental Management in the Arctic under a Rapidly Changing Climate (Arctic Agenda 2020) GEF ID = 4664

Germany welcomes the very ambitious GEF Project Framework Document designed to establish a partnership on sustainable environmental management in the Arctic. Improving environmental quality in the Russian territory of the arctic zone is of critical importance to the

whole circumpolar Arctic. The proposal notes that the most profound environmental change driver in the Arctic is climate change, where temperatures are rising at twice the global average and that incentives are needed to stimulate energy-savings and rehabilitate environmental hotspots. An ambitious and comprehensive multi-sectoral programme is set forth that is designed to have multiple global environmental benefits in the areas of climate change, biodiversity and international waters.

Germany is pleased to see the significant co-financing structure that is being put into place – indeed the GEF contribution represents only 8% of the total cost of the project – as well as the participation of multiple local and international NGOs, who will bring a wealth of experience and knowledge to the project. The final project documents under this program should contain more information about the co-financing that will be provided by the private sector.

As the program moves forward, Germany would like to support the comments made by the STAP with regard to creating more synergies amongst the global environmental benefits and drawing upon existing studies and sources of information about vulnerability in the Arctic.

42. Uzbekistan - IBRD - Sustainable Agriculture and Climate Change Mitigation Project. GEF ID = 4642

We would like to emphasize that the envisioned mitigation impact should be specified and, if possible quantified, as clearly as possible.

Climate Mitigation is only achieved if fossil energies or unsustainable use of biomass are substituted by renewable energy. Therefore, while supplying renewable energies to rural areas has a clear development impact, the additional mitigation impact should be specified as clearly as possible. We would recommend to clarify in the Final Project Document what kind of energy supply (electricity, gas, fuel, biomass) is actually substituted by renewable energies, and to which amount.

Regarding coordination with other related initiatives, we would recommend to coordinate with ICARDA, which has office in Tashkent and Urgench and extensive experience in researching and promoting sustainable agriculture, especially in irrigated areas, in Uzbekistan.

43. Zambia - UNDP - Strengthening Management Effectiveness and Generating Multiple Environmental Benefits within and around Protected Areas in Zambia. GEF ID = 4639

With regard to component 1 the project should consider the KAZA secretariat as a key stakeholder. German Financial Co-operation (KfW) is a key donor at KAZA level and within the efforts of donor coordination the implementing agency should actively seek contact in order to ensure synergies and complementarities.

At the SADC level, the German Government through German Technical Cooperation (GIZ) provides support to the implementation of regional programmes, including the SADC Programme on Transfrontier Conservation Areas and the SADC Support Programme on REDD. It is recommended that in the final project design reference is made to these regional programmes and that regional authorities are consulted for improved coordination and cooperation.

44. Zimbabwe - IBRD - Hwange-Sanyati Biological Corridor (HSBC) Environment Management and Conservation. GEF ID = 4645

We share the substantial concerns expressed in the STAP screening. The problem analysis is simplistic and should consider existing challenges in the governance of natural resources, including an analysis of the political, legal and institutional framework. A more in-depth

review of the CAMPFIRE experiences should be provided, and the scope for reintroducing and improving sustainable CBNRM should be assessed taking into consideration the political and socio-economic conditions. An institutional capacity assessment is missing even though component 3 aims at strengthening technical and institutional capacities for improved “management of ecosystems using a landscape approach”. Bilateral donors are mentioned as the main contributors for funding sustainable alternative livelihood activities under component 1, but are not identified under B.5. (key stakeholders) nor B.6. (Coordination). The PIF contains (spelling) errors which need to be corrected, e.g. “SADAC investing in Transboundary Conservation Areas.”. It is also surprising that SADC is mentioned as a cofinancier. With regard to component 1 (Improving PA management effectiveness), the following issues should be considered:

- The KAZA Secretariat should be seen as key stakeholder, and the final project proposal should elaborate on mechanisms for cooperation at the regional and transboundary level.
- Significant opportunities for sharing lessons and for synergies also exist in the implementation of regional programmes, such as the SADC Programme on Transfrontier Conservation Areas and the SADC Support Programme on REDD.

45. Algeria - UNIDO - Environmentally Sound Management of POPs and Destruction of PCBs Wastes. GEF ID = 4508

It can only be assumed - but it is not clearly expressed - that investment from the private sector is envisaged during project implementation. Therefore, we advise to consult the implementation team of GEF project ID 2770. In this project the valorization of reclaimable material of PCB wastes is used, at least in parts, to meet the costs for ESM.

46. China - IBRD - Municipal Solid Waste Management. GEF ID = 4617

The baseline scenario is presented in a clear and comprehensive way. However, further clarification is needed as to why the overall release of PCDD/PCDF is expressed according to WHO standards, i.e. TEQ (338g TEQ/a; it is assumed that the number refers to the country) and the possible savings on the other hand are expressed according to the NATO standard, i.e. 22g I-TEQ/a. These savings presume that the pilot project is implemented in the remaining 40 fluidized bed incinerators (it is not clear whether the 40 incinerators refer to the pilot region or to the country).

Assuming that the 22g I-TEQ/a refers to the country, then why are the savings so small compared to the baseline scenario of China of 2004?