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

Subject: Comments by Germany on SCCF Intersessional Work Program March 2011

Dear Ms. Barbut,

Attached, please find Germany's comments on the SCCF Intersessional Work Program March 2011.

Germany approves the Work Program. Attached, please find our comments on one of the PIFs with the request to take these into account during the drafting of the final project document.

Germany requests that the project 2. *Tajikistan: Increasing Climate Resilience through Drinking Water Rehabilitation in North Tajikistan (EBRD)*. GEF ID = 4422 will be sent as final project document for Council review four weeks prior to CEO endorsement.

Best regards,

Matthias Seiche
on behalf of
Frank Fass-Metz

2. Tajikistan: Increasing Climate Resilience through Drinking Water Rehabilitation in North Tajikistan (EBRD). GEF ID = 4422

Germany approves the PIF but requests that the Project Framework is revised thoroughly during the drafting of the final project proposal:

Germany supports in principle the aim to reduce vulnerability to climate change in the field of drinking water in Tajikistan.

However, the PIF does not provide sufficient information on the relation between baseline investments and adaptation finance provided by SCCF:

- The co-financing structure and the project boundaries are not sufficiently clear: Two out of four components (components 1 and 3) have no indicative financing from SCCF. While, in principle, the high co-financing share is welcomed, there seems to be no link to the SCCF project regarding components 1 and 3 – both thematically nor regarding financial contributions.
- The share of national government's co-financing in the overall co-financing structure is extremely low: (2%).
- Germany therefore requests a clear outline of project boundaries and co-financing structure.

The project document does not provide sufficient information that the project is mainly focused on addressing adaptation needs. It seems that project activities are rather normal development investments. Relevance and contribution of the project to climate change adaptation should be clarified:

- Main justification and focus of activities of the SCCF contribution is diversification of sources for drinking water from ground water compared to surface water.
- There might be merit in diversifying water sources to include groundwater from the perspective of adaptation, but this needs to be substantiated:
 - It is not sufficiently clear that drinking water availability is really at risk from climate change. Further details, e.g. on climate change induced water quality problems or seasonal shortages, should be provided.
 - It is not clear whether or not sufficient information is available about the availability of groundwater to alleviate the problem. As both surface and ground water may originate from the same sources (e.g. glacier/snow cover), the proposed adaptation measure may only shift the problem.
- If sufficient information cannot be provided at this stage, further analysis as part of a PPG or with own resources may be recommendable. A starting point could be the development of an aquifer plan mentioned under component 4.
- Germany therefore requests a substantiation of relevance and sustainability of the approach: Does groundwater use in the specific context contribute to increased climate resilience of drinking water in a sustainable and cost-effective manner?