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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 May 2011**

Dear Ms. Barbut,

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

Germany requests the World Bank and the GEF Secretariat to provide, starting at the spring 2012 Council meeting, an annual information document on the status of the Program: Sahel and West Africa Program in Support of the Great Green Wall Initiative. This information document should provide answers to the attached comments on page 4 below.

With kind regards,

Matthias Seiche  
on behalf of  
Frank Fass-Metz

***Germany approves the following PIFs and PFD in the work program but asks that the following comments are taken into account and improvements are made during the drafting of the final proposal:***

**3. Sao Tome and Principe - IFAD - Integrated Ecosystem Approach to Biodiversity Mainstreaming and Conservation in the Buffer Zones of the Obo National Park  
GEF ID = 4494**

- 1) Besides strengthening associations and NGOs within rural and coastal communities as key stakeholders of the project it would be recommendable to explain how the project will strategically attend the government sector, also on the national level. Mainstreaming of biodiversity in other sectors and the work on regulatory frameworks require ideas with which institutions (allies) the policy work will be done.
- 2) The risk assessment (under B4) could incorporate the aspects of climate change and what kind of synergetic elements with the UNDP/GEF programs might help in mitigating the risks.

**4. Uganda: Conservation and Sustainable Use of the Threatened Savanna Woodland in the Kidepo Critical Landscape in North Eastern Uganda. GEF ID = 4456**

Germany agrees with comments from STAP, especially with those concerning component 2. According to the PIF, the biodiversity of the Kidepo landscape faces growing threats: wildlife poaching and bush fires, unsustainable use of natural resources, especially Shea tree and landless returnees living from charcoal production, and infrastructure placement. How many people/families etc. are currently living in the area, how many are expected to come? How will the project address the livelihoods of returnees? It is not clear from the project design how poaching and bush fires will be dealt with, as well as how returnees may participate in the project activities.

The proposed project aims at halting net loss of natural habitat in the critical landscape and at reducing hunting pressures by at least 40% in wildlife corridors and dispersal areas. The PIF should elaborate briefly on how the baseline on poaching will be determined and on the planned project measures to enforce the laws, especially how armed poachers from Southern Sudan will be controlled.

**5. Regional - ADB/UNEP - Pilot Asia-Pacific Climate Technology Network and Finance Center. GEF ID = 4512**

The project is highly welcomed to allow a prompt start of the Climate Technology Center und Network (CTCN) as one of the two key elements under the new Technology Mechanism. But the Title – only slightly modified from the original title – suggests that this project is already the implementation of the CTCN. This impression should be avoided, since a decision on the structure and function as well as the interrelationship of the CTCN with the Technology Executive Committee is still outstanding; a decision is expected at COP 17.

We therefore suggest that the title and the approach are taking the open issues under the Technology Mechanism into account. GEF and the other funding agents should avoid the impression that the project is preempting any decision on the CTCN.

**7. China - IBRD - GEF Large-City Congestion and Carbon Reduction Project. GEF ID = 4500**

- 1) The overall project approach is supported. Projects on urban transport improvement, transport demand management and public transport are urgently needed in China. However, the relation and cooperation with the mentioned China-GEF-World Bank Urban Transport Partnership Program (CUTPP) need clarification. It should be ensured that capacity building on urban transport is properly integrated in the overall project design.
- 2) The way how GHG emissions are reduced, measured and monitored is not described in detail. The STAP comment on how the STAP methodology to demonstrate GHG emissions is applied is a prerequisite for baseline development and demonstration of GHG emission reduction and needs to be taken into account. Measurement of transport emission reduction through TDM and other urban transport measures is also included in German-Sino projects as well as efforts of the ADB to provide TA in China.
- 3) Coordination with transport related projects of the German government is advisable. Coordination with the transport component of the Sino-German BMZ Climate-Programme, the Sino-German project on electric mobility and climate change and the project on transport demand management and climate protection in Beijing (all implemented by GIZ) as well as training courses developed within the "Sustainable Urban Transport Project" should be ensured and synergies explored. This is especially true for efforts on capacity building and GHG measurement.
- 4) It would be useful to define clear milestones that on the one hand show the progress and success of the project. On the other hand, these milestones also could be used to ensure cooperation with a number of projects on urban transport in China.

**8. China - IBRD - Green Energy Schemes for Low-Carbon City in Shanghai. GEF ID = 4488**

- 1) The proposed project aims at both retrofit of existing buildings and piloting of new near zero emissions buildings. Given the poor constructional quality of a large part of the Chinese building stock and the short life cycle resulting thereof, World Bank should consider to focus more on economically feasible and replicable technologies for new buildings. This could lead to a higher mitigation impact for the given investment, as cost-effectiveness usually is much lower for existing than for new buildings. Piloting of near zero emission buildings, as envisaged in the proposed project, would imply very high costs compared to more marketable solutions that also allow for high mitigation effects. To concentrate on economically sustainable solutions for new buildings would furthermore help mitigate the collective action risks associated with the proposed project (multi-owner situations, split-incentive problems, etc.).
- 2) Up to now, information on the expected mitigation volume has only been provided with regard to the overall mitigation potential in the pilot area. World Bank should provide this information on the expected mitigation volume as soon as available. Compared with the overall investment, 160 kt CO<sub>2</sub> appear to be a rather limited amount. This point should be considered in the explanation. World Bank should also provide information on how to ensure that the purchased "green electricity" implies additional mitigation (e.g. through labeling).

### **9. Nigeria - IBRD - Small-scale Associated Gas Utilization. GEF ID = 4490**

Germany welcomes the PIF and the intention to reduce Greenhouse gas emissions through a reduction of gas-flaring at oil-production facilities. Germany supports the comments provided by the STAP and suggests that the proposed improvements be incorporated into the final project proposal.

### **10. Regional – IBRD – Sahel and West Africa Program in Support of the Great Green Wall Initiative. GEF ID = 4511.**

Germany welcomes the programmatic approach and the general outline of the proposal, but proposes significant improvements. The common programmatic denominator of the list of national projects is not sufficiently elaborated. The added value of assembling national projects under a program umbrella seems to be limited to joint monitoring and a regional knowledge management instrument.

Approach: While the World Bank and GEF, confirmed by the preliminary project outlines and GEF statements, clearly see the Great Green Wall Initiative as a concept advocating for enhanced country-wide investment and capacity building in the Sahel region, some of the Governments promoting the Great Green Wall Initiative rather advocate for a concept of a 15 km integrated development zone stretching from Dakar to Djibouti. Consequently, actual national concepts (such as the one from Mali focusing on a linear development zone with 46 communities along a 1800 km line) might have regional overlapping with the proposal, but not necessarily the same approach and governance requirements. For the sake of avoiding future conflicts, especially on governance issues, the overall programmatic approach and the scope of the projects (e.g. national, cross- border ...) should be clarified. The role of decentralized planning and implementation needs to be better elaborated.

Scaling up: Scaling up SLM on the basis of existing best practice is a major promise of the proposal. The proposal presents bottlenecks for scaling up, but needs to be much more precise on strategies for scaling up - including those strategies deriving from the TerrAfrica experience.

Knowledge management is to be a pillar of the regional dimension of the program. The proposal should elaborate on the concept of knowledge management and lessons learnt from the experience in knowledge management under TerrAfrica. Knowledge management limited to the existing TerrAfrica web page is not a sufficient approach.

Governance and Institutional set-up: The newly founded Pan African Agency for the Great Green Wall is to play a key role in political coordination, advocacy and knowledge management. Similar tasks are allocated to the AU/NPCA without clarifying roles and responsibilities between these two institutions.

Link with TerrAfrica: The proposal presents the program as a TerrAfrica program. It should therefore be made clear in which way TerrAfrica's mission, objectives and action lines are still valid. Coalition building, one out of three TA action lines is not mentioned in the proposal. The proposal should explain how the existing TerrAfrica platform is to be used, maintained or replaced under the program. In general, lessons learnt from the first TerrAfrica phase should be presented.

Co finance: Possible co-finance commitments should be clarified. Partners during the Bonn conference have expressed support, but none has announced co-finance for the program.

Germany requests the World Bank and the GEF Secretariat to provide, starting at the spring 2012 Council meeting, an annual information document on the status of the Program. This information document should provide answers to the above comments.

**11. Belarus - UNDP - Landscape approach to management of peat lands aiming at multiple ecological benefits. GEF ID = 4419.**

While the project has the goal to deal with the peat issue in a holistic approach at national policy level, the aspects of ongoing large-scale peat extraction are not fully taken into account. It is furthermore not clear, how far the degraded agricultural and forest peat lands contribute to the GHG emissions in comparison to peat mining. More information on these aspects is required to better understand the relevance of the project.

The economics of peat management is not well elaborated. The project proposal mentions the *State Program on the Reconstruction of Drainage Facilities*, which is a 150 million USD operation over the next five years, and which may have detrimental effect on much of the agricultural and forest peat lands. This programme aims at reconstructing drainage facilities and may thus lead to an immense degradation of peat and subsequent GHG emission. This programme should thus not only be mentioned as one of the ongoing operations, but it may be necessary to design the UNDP-GEF project around this programme, if the project wants to achieve results at the national level.

Output 2.1.3 considers the transfer of ownership of peat land ("Restored land re-classified as pastures or protected areas and transferred to a new owner where appropriate"). Normally, one would expect this to be a major issue with heavy social and economic implications. The consequences of this ambitious undertaking need to be better elaborated.

**13. Jamaica - IADB - Integrated Management of the Yallahs River and Hope River Watersheds. GEF ID = 4454**

The proposal covers the relevant topics for sustainable development in land and water management and conserving biodiversity. The full proposal should clearly identify the linkages between biodiversity and sustainable land management and the resulting impacts on livelihoods. It needs to be analysed in which relevant sectors the linkages and impacts of biodiversity and sustainable land management can be integrated.

The process of an economic evaluation of ecosystem services needs to be further elaborated and analysed how this process can contribute to development planning in relevant sectors.

In addition it is relevant to identify opportunities and constraints for up-scaling successful local activities in order to disseminate and embed successful approaches at different levels. Prior to this, an adequate up-scaling approach needs to be defined.