

TELEFAX

Sender:

Frank Fass-Metz
GEF Council Member
Head of Division Climate Policy and Climate Financing
BMZ (Federal Ministry for Economic Cooperation and Development)
Adenauerallee 139-141
53113 Bonn, Germany

Telefax No.: +49-228-535 3980
Email: Frank.Fass-Metz@bmz.bund.de
Advisor: Matthias Seiche
Email: Matthias.Seiche@bmz.bund.de

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To: Monique Barbut
Chief Executive Officer and Chairperson
Global Environment Facility
Fax: 001 – 202 – 522-3240
(advance copy also sent by email to: gcoordination@thegef.org)

Subject: Comments by Germany on the November 2009 Work Program

Dear Ms. Barbut,

Following the approval of the November 2009 Work Program please find below Germany's further comments on some of the projects.

Best regards

Matthias Seiche
on behalf of
Frank Fass-Metz

Germany would like to provide comments on the following project proposals of the November 2009 work program:

Biodiversity:

1. Global UNEP BS: UNEP-GEF Project for Continued Enhancement of Building Capacity for Effective Participation in the BCH (GEF Project Grant : \$2,500,000)

During CBD MOP-4, it became obvious that a large number of the Members are not in compliance with the obligations of the Cartagena Protocol and the requests from the previous MOP-decision to provide information to the SCBD in general and the BCH specifically. The report of the SCBD "Operations and Activities of the BCH" (UNEP/CBD/BS/COP-MOP/4/3, eg. para 18) reveals a substantial lack of information which was supposed to be made available in the BCH through the respective national institutions.

Based on these facts, Germany would like to request that the results of the evaluation of the first phase of the GEF BCH project on the ability of Member States to fulfill their obligations under the Protocol are taken fully into account. To make a second GEF BCH project effective and sustainable, the underlying causes of the low level of entries into the BCH have to be analyzed at the technical, administrative, and political level. A second GEF BCH project must be tailored in such a way to address these underlying causes adequately.

3. Cameroon World Bank CBSP Conservation and Sustainable Use of the Ngoyla Mintom Forest (GEF Project Grant : \$3,500,000)

Specific measures should be conceived that take into consideration that land-use planning and gazettement of protected areas and forests go beyond the mandate of the ministry in charge of forests. The government of Cameroon could outline how the institutional sustainability of land-use planning results can be achieved (e.g. improved gazettement process and attribution of land titles).

4. China UNDP CBPF: Strengthening Globally Important Biodiversity Conservation Through Protected Area Strengthening in Gansu Province (GEF Project Grant : \$1,738,000)

The outcome indicator "At least 10 PAs covering at least 3,000,000 ha receiving 20% additional financing over baseline by project end" should be better specified to indicate that the outcome is measured in real terms, so that the project is able to demonstrate increased funding for conservation relative to increases in funding for other development activities. As the outcome indicators are currently stated, the project will probably be able to achieve them even without successful implementation of the project's more innovative elements.

5. Costa Rica IADB Integrated Management of Marine and Coastal Resources in Puntarenas (GEF Project Grant : \$3,000,000)

The statement: "It is not expected that significant climate change-related risks will prevent project objectives from being achieved in the timeframe of the Project," is misleading because impacts of the project should last beyond its timeframe. Considering that Central America will be considerably affected by climate change, adaptation measures should be integrated into the project design especially with regards to spatial planning.

6. Guinea World Bank SPWA-BD Mainstreaming Biodiversity in Mineral Governance in Guinea (GEF Project Grant : \$1,950,000)

All three GEO Indicators should be clearly defined with figures, percentages and data. The full project proposal should differentiate approaches and biodiversity indicators between mining of iron ore in the Mount Nimba region, diamonds in Upper Guinea and Bauxite in the coastal region.

7. India UNDP IND-BD Mainstreaming Coastal and Marine Biodiversity Conservation into Production Sectors in the Malvan Coast, Maharashtra State (GEF Project Grant : \$3,438,294)

We repeat the comment made to an earlier PIF of the same PA - In the document the challenge presented by climate change is considered a risk and not an integral part of the project concept. On the other hand the expected sea level rise among others will have considerable impacts on biodiversity and natural resource management and proposed measures should have the impacts of climate change in mind.

Climate Change:

13. Global (Cook Islands, Turkey) : TT-Pilot (GEF-4): Realizing Hydrogen Energy Installations on Small Islands through Technology Co-operation (UNIDO) (GEF Project Grant: \$2,677,273)

Hydrogen as an alternative energy source is not a proven technology, and it is unclear as to why a non-commercially viable technology is being tested in a setting that can be considered extremely challenging from an infrastructure point of view. Furthermore, it is unclear why the technology is being tested in the Cook Islands and Turkey, which are geographically disperse, and particularly in a country of 20,000 people (Cook Islands) where the cost-benefit per ton of CO2 savings amounts to about \$550/ton. Apart from hydrogen fuel cells, other technologies to store renewable energies should be investigated as an alternative during project preparation.

Land Degradation:

30. Global : Enabling Paradigm Shift on Monitoring and Assessment within the UNCCD - Piloting the Reporting of the Performance Indicators 2010 (UNEP) (GEF Project Grant : \$2,545,454)

Germany welcomes the initiative on "Enabling paradigm shift on monitoring and assessment within the UNCCD-Piloting the Reporting of the Performance Indicators in 2010". The proposal from UNEP is well founded and represents a very timely support to parties in their efforts to implement the 10-year strategy of the UNCCD. Support to reporting in this case is embedded in capacity building and system development for Monitoring and Assessment of UNCCD Implementation and Land Degradation. As such it can be approved. Nevertheless we wish to underline that pure reporting activities should not become regular funding activities for the GEF. We therefore suggest to delete the second part of the project title. The title should then read "Enabling paradigm shift on monitoring and assessment within the UNCCD". During further conceptual development of this project the following aspects should be taken into consideration:

- Mobilize a maximum of bilateral and regional partners that are engaged in strengthening focal point structures in order to enhance sustainability of the project.
- Provide sufficient back-stopping to guarantee quality and comparability of monitoring systems and reports.
- Emphasize participation and ownership of the process and quality of the reports (best practices) rather than on the quantity of countries covered.

Multi Focal Area:

31. Russian Federation : TT-Pilot (GEF 4): Phase Out HCFCs and Promotion of HFC-free Energy Efficient Refrigeration and Air-Conditioning Systems in the Russian Federation Through Technology Transfer (UNIDO) (GEF Project Grant : \$18,000,000)

The project document points out the possibility that the phasing out of ODS may not always be the most climate-friendly option in terms of the GWP of the gas used to replace the HCFC. All feasible options to create win-win scenarios both for the ozone and the climate should be considered. HCFC-22 has a GWP of 1810. There are alternatives to HCFC22 that are Ozone Friendly but not climate friendly. These include: HFC 143a, HFC 404a, and HFC 407c. If these substances are being considered as alternatives, then the project does not achieve its multi-focal area goal of creating win-win scenarios for the ozone and the climate. Alternatives that are both climate and ozone friendly are: HC 290 (for air conditioners), HC 600a (for refrigerators), NH3, and CO2. Germany recommends that both climate and ozone friendly substances be used as alternatives to HCFC22 for this project.

POPs:

34. Regional (Burkina Faso, Benin, Central African Republic, Cape Verde, Guinea, Guinea-Bissau, Liberia, Mali, Mauritania, Niger, Sierra Leone, Senegal, Sao Tome and Principe, Chad, Togo): AFLDC:Capacity Strengthening and Technical Assistance for the Implementation of Stockholm Convention National Implementation Plans (NIPs) in African Least Developed Countries (LDCs) of the ECOWAS Subregion (UNEP/UNIDO) (GEF Project Grant : \$8,000,000)

It is noted with regret that the project will not embark on POPs disposal operation. With reference to the coordination with other GEF supported POPs disposal operations it has been noted that these are presently confined to Tanzania only. Synergies of the activities focusing on corresponding strengthening of capacities should be explored further.

35. Regional (Lesotho, Madagascar, Mozambique, Tanzania, Zambia): AFLDC:Capacity Strengthening and Technical Assistance for the Implementation of Stockholm Convention National Implementation Plans (NIPs) in African Least Developed Countries (LDCs) of the SADC Subregion (UNEP/UNIDO) (GEF Project Grant : \$3,000,000)

It has been noted that management of POPs waste (including PCBs) have been specifically listed as priority area in several participating countries. To this regard further clarification may be useful about the links between the activities under this project with GEF Project ID 2770 (Regional) - Demonstration of a Regional Approach to Environmentally Sound Management of PCB Liquid Wastes and Transformers and Capacitors Containing PCBs. Synergies of the activities focusing on corresponding strengthening of capacities could be explored further.

It is noted with regret that the project will not embark on POPs disposal operation. With reference to the coordination with other GEF supported POPs disposal operations it has been noted that these are presently confined to Mali only. Synergies of the activities focusing on corresponding strengthening of capacities should be explored further.