



Global Environment Facility

September 29, 2008

COMPILATION OF TECHNICAL COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON INTERSESSIONAL WORK PROGRAM
APPROVED BY COUNCIL ON SEPTEMBER 23, 2008

NOTE: This document is a compilation of technical comments submitted to the Secretariat by Council members concerning the project proposals presented in the September 2008 Intersessional Work Program approved by the Council on September 23, 2008.

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**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

GENERAL COMMENTS

COMMENTS FROM THE UNITED STATES

In a letter addressed to GEF CEO, Ms. Monique Barbut, dated September 22, 2008, Mr. William Pizer of the US Department of the Treasury writes:

“I am writing to convey the United States’ position and comments with regard to the thirteen projects that you forwarded to the Council earlier in August.

With regard to the project **Eastern Nile Watershed Management Project**, I would like to express the United States’ support for the project’s goals. However, this project will provide support to Sudan. As such, due to policy concerns relating to states that provide support for international terrorism, we request that the United States be recorded as opposing this project.

We can support the other twelve projects, but we request that the GEF agencies and Secretariat take the attached set of comments into consideration in the further design and review of these projects. Thank you for your continued efforts.”

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| INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (REFERENCE TO GEF/IS/19) |
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BIODIVERSITY

1. Regional (Malawi, Zambia): Sustainable Management of Nyika Transfrontier Conservation Area [World Bank]

COMMENTS FROM GERMANY

1. The overall project concept makes sense in our view and should be developed to a full project proposal accordingly.
2. It was interesting to read the harsh analysis of Germany's interventions between 1996 and 2003 in the border zone around Nyika Park and Vwaza Marsh. KfW very recently concluded its post appraisal and arrived at somewhat different conclusions. The funds mentioned in the PIF document were only those pledged by KfW, the amount of external technical assistance provided by a complementary GTZ project was similar but is not included in this sum. Important results of these projects were conveyed to the Wildlife Policy Act of 2000 which created the basis for improved participation of local population in protected area co-management.
3. Likewise crossborder cooperation with Zambia was initiated under these projects and a major problem was the provision of running costs, including salaries, for park management while at the same time the expected incomes from tourism did not materialize.
4. We wonder what happened to the institutional framework between 2003 and 2008, so that the German support became a failure and the GEF project starting five years later gets such a favourable prognosis that institutional risks are not even mentioned in the risk assessment. We wished the proposer would have spent some more time for analyzing the achievements and failures of Germany's support to the Nyika Park and Vwaza Marsh. To avoid any doubts, that previous problems in the institutional framework continue, the World Bank should ensure and provide information in this regard, that the institutional risks have been solved.
5. Annex 2 ("Detailed Information on biodiversity value of proposed TFCA") does not really highlight the importance of the intervention area for biodiversity conservation. Irrelevant aspects take much space and one asks what the statements on the occurrence of rats and sparrows are good for (what does it, e.g., mean that house sparrows have been observed in the immediate vicinity of the TFCA?). Still much has to be done during further project development to get a better understanding of biodiversity concerns (what kind of biodiversity is the project going to protect?) and to set up conservation and management priorities.

COMMENTS FROM THE UNITED STATES

6. We concur with the comments of the Scientific and Technical Panel (STAP) that the project needs to describe more clearly describe the public private partnership and better identify the threats to the trans-frontier conservation area.

7. We are pleased to see that both countries are drawing from their RAF allocations for this collaborative, transboundary effort.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

2. Dominican Republic: Re-engineering of the Dominican Republic Protected Areas System [UNDP]

COMMENTS FROM GERMANY

8. Germany agrees to the project proposal without a need for further comments.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

3. Egypt: Strengthening Protected Area Financing and Management Systems [UNDP]

COMMENTS FROM GERMANY

9. The overall project concept makes sense in our view and should be developed to a full project proposal accordingly.

10. The table in Chapter A (Project Framework) is confusing as project indicators are found under project outcomes. Generally speaking, this table does not fully meet the requirements of GEF proposals; hardly any project distinguishes between project components and project outcomes, but the template foresees one column for each of them. As there is also often not enough space for the full wording of outcomes and outputs, the reader has to cross-check with the main text. It is recommended to the GEFSEC to provide a more appropriate version of this template.

COMMENTS FROM THE UNITED STATES

11. The United States supports this proposal as it addresses a key concern that the United States has voiced to the Government of Egypt (GOE) in the past - the under financing of protected areas. We believe it outlines important key steps towards improving the management of the protected area network by the Nature Conservation Sector (NCS), with which the United States Forest Service has an important partnership. Below are some specific comments on the proposal.

12. **Component 1: Financial resource mobilization:** We agree that promoting eco-tourism can and should be an important part of NCS management objectives. Because tourists will expect a certain level of services, the project should also discuss how minimum operating standards will be defined, facilities to be maintained, and how staff will be trained in customer service. There are risks of relying predominantly on tourism revenues for park management, which this exposes park funding to fluctuations in the tourism market. To help mitigate this, we recommend setting a sufficient annual base budget that is funded independent of tourism revenues.

13. Please also describe the components of the project related to local community engagement, involvement, and benefits sharing. It would be best to identify sustainable strategies that benefit local communities, rather than just operators out of major cities. The project might wish to consider how communities could set up NGOs or CBOs that can complement the efforts of the NCS in assisting with protected area management.

14. **Component 2: Improved business planning and cost-effective management:** The NCS has many rangers with scientific training, but there is a need for more rangers with training in the social sciences or business management. NCS should consider diversifying its work force to include rangers with MBAs or other specialists in financial management.

15. This project make a serious effort to incorporate and build on the extensive business and management planning processes supported by the Italian government and USAID, respectively, at such sites as Wadi El Rayan and Wadi El Gemal. For instance:

- A business planning method has been field tested at Ras Mohammed and Wadi El Rayan, and a site level management effectiveness process has also been field tested in Egypt.
- The final report of the Wadi El Rayan Egyptian-Italian Project includes important lessons learned and recommendations for business planning, capacity building among rangers, and methods of revenue generation and retention.
- The LIFE project at Wadi El Gemal has likely produced similarly useful plans and reports.

16. **Component 3: Strengthening legal regulatory and institutional frameworks:** This component is of exceptional importance. The final proposal should clarify how the project will monitor the progress that the GOE is making in terms of changes to the legal, regulatory and institutional frameworks to support revenue generation, retention and disbursement. Reforms will also need to be carefully phased so that such legal, regulatory, and institutional changes precede changes for business planning and management effectiveness. This will be important for the sustainability of the final outcomes.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

4. Kenya: Strengthening the Protected Area Network within the Eastern Montane Forest Hotspot of Kenya [UNDP]

COMMENTS FROM GERMANY

17. The overall project concept can be supported but the full project proposal should address more explicitly the risk identified as high.

18. The major driver for land-use change and degradation of forest areas has its origin in a large farming population due to unsustainable farming systems and demographic growth. This finds its expression in a high risk: “Land pressure and short-term gain seekers reduce attempts for rational landscape level conservation”. This problem is not adequately addressed in the proposal, e.g., “The long-term solution to address these pressures is to strengthen the PA system so that it serves as a shield against human-induced pressures on forest biodiversity” is not a solution to unsustainable farming.

19. Unfortunately, little is said how the project will achieve “...integrate Pas into local area development frameworks”, which could be an important measure. Likewise, “the project will seek to manage trade-offs between real development needs and conservation actions within the PA system. Improved enforcement will serve as a deterrent against rent seeking; the project will therefore strengthen enforcement capabilities”, might not be the best way to address the need for sustainable livelihoods of the local population and even the assisted relocation of illegal settlers is not a measure to build confidence. Therefore, it is surprising that even for community-based management of PAs only US\$2 million of US\$15.5 million are foreseen.

20. Under co-financing a Donor Consortium on Mau Forest will contribute US\$5 million equal to almost 50% of cofinancing. Please explain how this influences the availability of co-financing for the other areas.

21. For the development of the full project proposal the results and experiences of a large German development and application-oriented research project (conservation and sustainable use of biodiversity, since 2001) in the Kakamega Forest “BIOTA-East” could provide important insights for improving the project design in this area. Unfortunately, the focus on other related initiatives is on GEF-supported projects only.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

5. South Africa: Development, Empowerment and Conservation in the Greater St Lucia Wetland Park and Surrounding Region [World Bank]

COMMENTS FROM GERMANY

22. The overall project concept makes sense in our view and should be developed to a full project proposal accordingly.

23. Changes especially regarding the formulation of community related activities outlined in the STAP review should be made during further development of the proposal and during project implementation.

COMMENTS FROM THE UNITED STATES

24. We concur with the STAP team on the need to flesh out the second component (e.g., community-based conservation) as the project proposal is developed. The final project proposal should clearly answer the following question: how will community investment in local economic and cultural development lead to environmental outcomes? The proposal seems to implicitly assume (1) poverty is driving threats and thus reducing poverty will reduce threats; and (2) small investments in conservation-oriented businesses combined with infrastructure development to improve access and delivery to local communities will lead to reduced threats. Lack of education/awareness also seems to be an implied problem in the proposal. These assumptions will have to be justified. For example, improved tourism might boost tourism, which could benefit the park, but it also could accelerate existing threats. The project proposal should also be clear on exactly what community-based interventions are proposed, how they were identified, and how they are hypothesized to reduce biodiversity threats.

25. We believe that a large number of scientific studies have already been done for this famous wetland and question the need for more in order to begin taking conservation action. The Bank may want to reconsider funding this objective and allocating funding to other objectives. If not, then this part of the proposal should be better justified.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

CLIMATE CHANGE

**6. Russian Federation: RUS: Standards and Labels for Promoting Energy Efficiency
[UNDP]**

COMMENTS FROM GERMANY

26. Germany agrees to the project proposal in general. Changes outlined below should be made during further planning steps and during project implementation:

- Please involve additional expertise as energy efficiency is not at the core of UNDP business.
- Part II states that consumers tend to buy inefficient appliances because of a lack of adequate information delivered to them. Is there not also a price differential between efficient and inefficient appliances that will need to be addressed in the awareness-raising campaign? E.g., incentive to pay more for an efficient appliance would be savings in energy costs in the long run.
- Agree with the suggestions by the STAP, and further on suggestion i) selection criteria: include information of import share and market development as criteria for selection and targeting interventions (e.g., a focus rather on consumer information or capacity building for manufacturers depending on import share).
- As planning step, please consider incentives that could be used for market transformation and include market information in the selection criteria for targeted appliances.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

INTERNATIONAL WATERS

7. Global: Groundwater Governance: A Global Framework for Country Action [World Bank]

COMMENTS FROM GERMANY

27. Germany agrees to the project proposal without a need for further comments.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

MULTI-FOCAL AREAS

8. Regional (Ethiopia, Sudan, Egypt): SIP-Eastern Nile Transboundary Watershed Management in Support of ENSAP Implementation [World Bank]

COMMENTS FROM GERMANY

28. Germany agrees to the project proposal. Changes outlined below should be made during further planning steps and during project implementation.

29. The PIF does not contain a description how the project intends to address global environmental benefits and how these benefits will be measured.

30. In general, the PIF seems to be quite general and it is not clear how the concept will be developed into a project. We would like to see a more substantive description of the programme components and planned activities and the expected outcomes.

31. Please specify the cofinancing sources for the project; the bilateral aid agencies are not explicitly mentioned.

COMMENTS FROM THE UNITED STATES

32. With regard to the project **Eastern Nile Watershed Management Project**, I would like to express the United States' support for the project's goals. However, this project will provide support to Sudan. As such, due to policy concerns relating to states that provide support for international terrorism, we request that the United States be recorded as opposing this project.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

**9. Regional (Kenya, Uganda, Tanzania, Burundi, Rwanda): SIP-Lake Victoria
Environmental Management Project II [World Bank]**

COMMENTS FROM GERMANY

33. Germany agrees to the project proposal without a need for further comments.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

10. China: PRC-GEF Partnership: Mainstreaming Biodiversity Protection within the Production Landscapes and Protected Areas of the Lake Aibi Basin [World Bank]

COMMENTS FROM GERMANY

34. The overall project concept makes sense in our view and should be developed to a full project proposal taking into account the following remarks:

35. The first project component (Strengthening of policy, regulations and planning for water and land management) that is to be cofinanced by GEF at 33% seems very much related to the ongoing PRC-Partnership Program on Land Degradation in Dryland Ecosystems and shows somewhat limited relation to biodiversity management and conservation. The expected outputs should or could have been achieved by the ongoing PRC partnership program.

36. The outputs of the second component (Conservation management and rehabilitation of globally-significant biodiversity resources) are production of plans that do not necessarily contribute to the achievement of the outcomes (Biodiversity resources more abundant and diverse, and better able to support commercial enterprises such as ecotourism). Either the outputs or the outcome should be reformulated.

37. The third component (Pilot promotion of sustainable agricultural practices in production landscapes with clear biodiversity benefits) refers to pilot promotion of agricultural practices with clear biodiversity benefits. Here the emphasis should be on quality and differentiation of practices according to the landscapes and local ecosystems rather than quantity as expressed in the output (minimum of x000 ha within Lake Aibi...).

38. The GEF contribution for the fourth component (Ecosystem monitoring) seems rather high. It would be surprising that suitable M+E monitoring systems related to ecosystems monitoring were not already developed under the PRC-Partnership Program on Land Degradation in Dryland Ecosystems. For adaptation of an existing system towards monitoring under the new project less funds would be required.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

11. India: SLEM-CPP-Integrated Land Use Management to Combat Land Degradation in Madhya Pradesh [UNDP]

COMMENTS FROM GERMANY

39. Germany agrees to the project proposal without a need for further comments.

COMMENTS FROM THE UNITED STATES

40. This proposal does a good job of describing the problems to be addressed and the intended outcomes. While we recognize that PIFs are meant to be short document, the PIF isn't sufficiently clear what specific actions will be taken to achieve the desired outcomes. We will need more detail on the methods to be used and work plan in the final project proposal.

41. If possible, we would like to see the final proposal flesh out how it will build on the work of the Wildlife Institute of India and the U.S. Forest Service, which addressed similar issues of biodiversity conservation in multiple use forests of Madhya Pradesh in the late 1990s, particularly in the vicinity of the Pachmarhi Biosphere Reserve.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

12. Swaziland: SIP-Lower Usuthu Smallholder Irrigation Project (LUSIP) [IFAD]

COMMENTS FROM GERMANY

42. Germany agrees to the project proposal without a need for further comments.

COMMENTS FROM THE UNITED STATES

43. We believe the project proposal should more clearly define who the lead agency will be for the Government of the Kingdom of Swaziland. When multiple agencies are involved, coordination is usually minimal at best, non-existent at worst.

44. We recommend that more specificity be given to how the project will develop alternative livelihoods as the PIF mostly seems to emphasize the need for greater dialogue.

45. The project should specify how it will build on previous efforts and collaborate with existing ones. There is currently good work being done in this area. For example, we understand that a Texas A&M Professor is supporting sustainable agriculture and sugar cane work. We recommend that the project seek to collaborate with such efforts.

46. We note that public support of a project does not necessarily translate into sufficient political will to implement it. In the proposal, we would like to see the implementing agency discuss its assessment of whether the government has sufficient political will for the project to succeed.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/19)**

13. Tunisia: MENARID - Land and Water Optimization Project [World Bank]

COMMENTS FROM GERMANY

47. The project does target a solution for the further use of waste water of the city of Tunis and its surroundings. The idea to valorise waste water for agricultural use in drylands under forthcoming hydrological stress due to climate change is appealing. Nevertheless, we have some concerns with regard to project concept and suggest a number of changes during the further elaboration of the project.

- Component 2 and 3 assume that waste water can be used for agricultural purposes. This is far from being sure and needs to be examined during the further development of the project proposal. We emphasize the need to refer to existing studies on the use of waste water for *Jatropha* cultivation to precise for which type of agriculture in which region waste water can be used.
- Examine cost-efficient alternatives as the efficient use of water in order to reduce waste water quantities.
- Cost benefit: the costs for the transport to the center and to the south as well as the energy needed to pre-treat waste water needs to be analyzed and taken into account.
- Climate impact: with regard to the global benefits GHG emissions caused by transport and treatment need to be analyzed and taken into account.
- Tunisia, with support of KfW is about to carry out a Feasibility Study about the opportunity to recharge groundwater resources with treated waste water (under the Ministry of Agriculture) which will be ready by the end of 2008. We recommend to build the further development of the project concept on the results of this study.
- There is a strong need to start coordination between MEDD and MARH during the further development of the PIF.

COMMENTS FROM THE UNITED STATES

48. We would like to emphasize our agreement with the STAP comment that it is critical for component #2 to take into account farmer's perspectives and knowledge, including distributional aspects.