



# Global Environment Facility

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COMPILATION OF TECHNICAL COMMENTS  
SUBMITTED BY COUNCIL MEMBERS  
ON INTERSESSIONAL WORK PROGRAM  
APPROVED BY COUNCIL ON JANUARY 27, 2009

NOTE: This document is a compilation of technical comments submitted to the Secretariat by Council members concerning the project proposals presented in the January 2009 Intersessional Work Program approved by the Council on January 27, 2009.

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## **BIODIVERSITY**

### **1. Global (Peru, Bolivia, Ecuador, Venezuela, Colombia) : Communities of Conservation: Safeguarding the World's Most Threatened Species [UNEP]**

#### ***COMMENTS FROM GERMANY***

##### **General Remarks**

1. Since the decision has been taken to confine the length of PIFs to four pages, they again started to become longer gradually. The present PIF comprises 11 pages and could be presented in a briefer way.

2. The project dedicates itself clearly to the goal *to achieve by 2010 a significant reduction of the current rate of biodiversity loss at the global, regional and national level...* What seems to be less intensively addressed is the second part of the 2010 goal that reads: *... as a contribution to poverty alleviation and to the benefit of all life on earth.*

##### **Specific remarks on the conservation concept**

3. The RARE concept involves the identification of flagship or "pride" species for each community that are supposed to trigger a behavioural change of community members towards the threatened species.

4. The concept, at least what can be read from the PIF document, does not focus on the diversity of peoples, communities, regions, and social and ethnic backgrounds. Communities appear as an amorphous body, although in the areas that will be covered by the project, there is a high ethnic and socio-economic diversity. Causes for habitat destruction and overuse are not just lacking environmental knowledge. Often, people simply have no other choice. On the other hand, partners of RARE and AZE are very experienced in working on community level, and have proven to apply participatory approaches with local and indigenous communities. Thus, they should be able to not impose the conservation concept but rather involve local people actively in finding solutions for non-sustainable use and habitat destruction.

5. The proposal does not refer to underlying causes for species extinction. Those are mostly found on other levels, especially on the policy level, but are not addressed or even mentioned in the PIF.

6. Another critical point refers to the executing agencies (NGOs) of the project: as RARE has proven to implement similar projects in different regions in the past, it is questionable that

GEF support is needed for financing the project. If this is considered, there should be more funds contributed from governments and NGOs.

7. The tropical Andean Region of South America is supported by many other conservation and development efforts. The proposal should make reference to existing activities when identifying the sites, as double work could be avoided and synergies created from mutual experiences.

### ***COMMENTS FROM THE UNITED STATES***

8. This project is notable for its site-selection methodology, straight-forward conservation approaches, emphasis on quantifiable results, and use of control groups. The STAP makes some valid points about the proposal's statistical robustness, but we also recognize the need to be realistic given limits in funding.

9. This project has a capacity-building component that is potentially eligible for supplemental technical/financial assistance through the U.S. Fish and Wildlife Service's (USFWS) "Wildlife Without Borders Regional Program for Latin America and the Caribbean.". We would appreciate it if UNEP could keep USFWS apprised of developments with the project. (The relevant point of contact is Mr. Bryan Hayum ([Brian\\_Hayum@fws.gov](mailto:Brian_Hayum@fws.gov)) who works within the Latin America and Caribbean branch.)

10. Some specific comments are:

- We recommend that sites be selected from the pool of eligible sites by someone other than Rare Pride employees. If possible, UNEP should identify a suitably impartial expert or outside consultant with expertise in impact evaluations to ensure that the selection of sites conforms to the highest professional standards and to conduct an end-of-project analysis of the project data.
- The project should seek to measure outcome variables other than/ in addition to knowledge and attitudes as they do not necessarily translate into modified conservation behavior.
- The concept mentions links to various regional and national Biodiversity Action Plans, but the project should also be designed to support the country's National Development Plan.
- Project will need to demonstrate how it will ensure "flow of economic benefits to local communities (key objective #13), which is not presently clear.
- There is a gap between the expected outputs, many of which would typically be outputs of an initial phase, and the expected outcomes, which would typically result from a longer, multi-phase effort. Many of the outputs refer to the design or establishment of activities rather than to their implementation per se. While it is possible to make the causal leap between the outputs and outcomes – as the STAP

suggests – it would be more practical to approach this as a multi-phase effort and significantly scale back the expected outcomes for this initial “set-up” phase.

- **Need to partner with organizations on ground:** The bulk of the concept description revolves around the work of two of the project partners: RARE and AZE. Several other entities are listed as executing partners (e.g. Conservation International, Birdlife, etc...) but their role is not clear. We recommend that the two organizations partner with those already working in the particular country on issues of “best practices and appropriate technologies..... habitat and species conservation”, and then bring the added value of the RARE PRIDE methodology to bear.
  - Bolivia is one country in particular where this makes sense as many of the partner organizations have worked there. The short time frame of the proposed concept (3 years), also provides justification for partnering with organizations already on-the-ground. Perhaps partnering was already the intention of the concept but it was not 100% clear.

#### Comments about Bolivia Component:

- With regard to education and awareness, we would note that in Bolivia working through the formal system (i.e. training teachers, curricula development etc...) is done through the Ministry of Education, which has been subject to significant change. Given this, the project should consider focusing on non-formal social marketing, outreach and communication activities as a more practical approach than working through the formal system.
- UNEP should take into account the upcoming December 2009 elections in Bolivia and possible changes at the national level. This might make it easier to work with local level governments and NGOs early during the project.

#### Venezuela component:

- The proposal notes that the two existing projects in Venezuela are on hold, and U.S. authorities have encountered some difficulties in working with Imparques recently. For these reasons, we recommend that UNEP exercise enhanced due diligence developing the project component in Venezuela to ensure that it is feasible and sustainable.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**2. Global (Chile, Vietnam, Trinidad and Tobago, South Africa, Lesotho): Project for Ecosystem Services (ProEcoServ) [UNEP]**

***COMMENTS FROM GERMANY***

11. Germany supports this project without a need for further comments.

***COMMENTS FROM THE UNITED STATES***

12. This is an interesting project that addresses a valid concern. It appears to fit well the countries where it will be implemented. However, we do not believe that environmental education is adequately incorporated into this proposal. We feel it ought to be a core element. We suggest that the proposal be refined to more explicitly address environmental education and public engagement.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**3. Global: Threatened Species Partnership/Save Your Logo [World Bank]**

***COMMENTS FROM GERMANY***

13. *We strongly recommend revising the project concept in a way that allows a more focused project approach with clear outcomes for species conservation.*

**Charismatic or non-charismatic species?**

14. The proposal acknowledges the “considerable efforts ... expended worldwide on species conservation”, although “many of those efforts are targeted on just a few charismatic species and rely on public funds and public donations for funding support”. It is furthermore stated that, “Large amounts of money, and even dedicated funds, are allocated to the conservation of a few charismatic species”. The project therefore is going to focus on less charismatic and less well-known species. This is a clear contradiction to the project’s title which promises to deal with logo species, i.e., highly charismatic species.

**IUCN Red Data Books**

15. The IUCN Red List of Threatened Species has proven an extremely valuable tool for conservation assessments and biodiversity monitoring. The preparation and regular update of the Red Lists is funded by many different donors, with continuous support given in particular by the Rufford Maurice Laing Foundation. There is no rationale given why GEF should now step into the business of elaboration of the Red Lists, as this seems to be a well-established process and there is no need for additional funding given.

**Mid-sized grants to species conservation**

16. GEF funds are going to be used to support at least 20 species conservation measures. It is not clear how and where these measures will be implemented. It must be avoided that species conservation projects here and there will be supported. It does not become clear from the proposal what the overall goal of these measures is (saving 20 species? If so, the costs would be very reasonable!). The Paris Declaration on Aid Effectiveness gives clear guidance on spending funds in a coherent way.

**Catalyzing early action**

17. Motion CGR4.MOT017 adopted by the IUCN World Congress is not related to early action. It calls for establishing small-grants programmes.

## **Species profiles**

18. There are hundreds, if not thousands of action plans (profiles) for species conservation available, part of them on a national and part of them on a global scale. The provision of funds for three (3) additional action plans is not an outcome, which should describe a change in the status of the species, but an input indicator or an output. It is furthermore a very modest number for a pure planning exercise. It should be considered that many action plans (unfortunately!) have no visible impact on the status of the species concerned, and it is unrealistic and does not make sense to establish action plans for all threatened species. More efforts should be spent to identify critical habitats and species groups and to provide action plans for them, rather than adding just a few more species action plans / profiles to the long list of already available plans.

## **Monitoring status of threatened species**

19. The outcome of this component reads, “Status of targeted species on Red List remains stable or improves”. This indicator is inappropriate. The regular updating of the Red List will not affect the status of the species concerned, only our knowledge about their status.

## ***COMMENTS FROM THE UNITED STATES***

20. This is an interesting activity that we can support supported, and we would like to commend the World Bank for committing its own grant funding for cofinancing this wildlife conservation effort. But we see two particular difficulties:

- First, it seems to take a mostly species-by-species approach, and we would want to see more of a landscape-based approach. Moreover, the project says that it will not simply focus on charismatic species, but since the project is aimed at conserving species that are company logos, we do not see how it would be able to focus on anything but charismatic species.
- Second, the level of funding for “communications and marketing” seems to be awfully high and we believe it should be cut back. Also, the cost of the website should obviously be incorporated as one of the communications expenses. We recommend that the corporate partners fund the communications and marketing costs.

21. Finally, we recommend that this proposal be modified to explicitly include the consideration of Category V Protected areas as conservation tools under this project.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**4. Regional (Central African Republic, Congo DR, Congo, Gabon): CBSP Sustainable Management of the Wildlife and Bushmeat Sector in Central Africa [FAO]**

***COMMENTS FROM GERMANY***

22. Germany supports this project without a need for further comments.

***COMMENTS FROM THE UNITED STATES***

23. The unsustainable commercial trade of bushmeat is one of the most pressing threats to the rich forest biodiversity of Central Africa. The United States very much supports the goal of making the take of forest wildlife in Central Africa ecologically sustainable. We have significant concerns regarding whether this project will have a meaningful impact on this pressing problem. We share many of the concerns raised by the STAP review of the project. We also believe that the proposal risks trying to build capacity from scratch in FAO that exists in other agencies and NGOs. A better approach would be to bring in more expert partners. We would like FAO to implement a more collaborative design. It should also more clearly specify the action component of each objective, and each objective should be measurable. It is not currently clear how the project will measure effectiveness in terms of trends in bushmeat exploitation and other key indicators of success.

24. **We would like to request that FAO consult with US experts on this project further with a view to making the substantial changes that we believe will be needed to merit GEF CEO endorsement.**

25. U.S. Government (USG) are concerned that this project seems to repeating efforts that FAO had previously conducted for the CITES Bushmeat Working Group between 2000 and 2003. FAO did not effectively engage key decision makers and did not build effective partnerships with individuals and organizations with greater expertise.

- We would appreciate better understanding how the project will go beyond the earlier FAO efforts and how it will improve collaboration with partners.
- For instance, TRAFFIC is starting to work in the region and FAO should try to bring them into the effort.

26. While FAO does coordinate important regional efforts related to this proposal (e.g. African Forest and Wildlife Commission), its main area of expertise is food security, whereas

this proposal needs to focus on management of wildlife resources. FAO might consider focusing its efforts on development of protein and income alternatives (although with the caveats we state below) but have partners who have greater expertise take the lead on information management, awareness, and enforcement aspects.

27. We agree with the STAP review that alternative livelihoods and general awareness raising have not been demonstrated to be effective in terms of bushmeat management and combating illegal and unsustainable commercial trade. Alternatives and positive incentives without enforcement only provide supplements to severely-compromised livelihoods and limited protein availability without necessarily reducing commercial bushmeat exploitation.

28. There is scant mention of enforcement issues, and no mention of enforcement outside local communities. This is a major weakness that should be rectified. There needs to be a greater emphasis on law enforcement and community responsibility. As a minimum, there should be some partnership-building to address this essential need.

29. We agree with the STAP review that community-based wildlife management in tropical forests is untested, but it is potentially an important concept to long-term management of bushmeat in Africa. We believe that the issues of governance and institutional capacity are essential, as well as the need for greater understanding and refinement of land tenure and related legal issues.

30. It is not clear how data will be gathered, analyzed, or distributed in this project. We recommend that the data gathering, storage and sharing component of this work be better defined. We strongly recommend that the project use the very effective IMAP system which has been developed to serve the purposes outlined in this proposal and can be readily adapted for other specific needs.

- The Bushmeat IMAP was supported by Fish & Wildlife Service, USAID CARPE and other donors, through collaboration with WCS and other partners of the Bushmeat Crisis Task Force.
- It is able to compare bushmeat projects across the continent and to report on trends in bushmeat exploitation, enforcement, research, and policy development. This system is unique and very well adapted to information management needs of this proposal.

31. In terms of awareness raising, we believe that RARE's and InCEF's mechanisms for building public awareness at various levels, and analyzing effectiveness of interventions, are far more sophisticated than what is recommended here. There is a need for innovative and more effective strategies to reach out to the public on this issue if there is a major shift to occur. A dedicated communications strategy should be identified with targeted audiences and key messaging that has been tested and identified through processes that engage the audiences to be addressed.

32. We agree with the STAP review that this could be a good project through which to implement an experimental project design.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**5. Regional (Fiji, Samoa, Vanuatu, Niue): PAS Forestry and Protected Area Management [FAO]**

***COMMENTS FROM GERMANY***

33. Several aspects remain unclear in the PIF.

- Country selection: Why Fiji, Samoa, Niue and Vanuatu and not other countries? GEF resources (650,000 \$) requested by FAO are the same for Niue and Vanuatu, even though Niue seems to be much smaller with the number of inhabitants still declining?
- Regional cooperation: The selected countries are member of the Secretariat of the Pacific Community (SPC) that also promotes
- Sustainable Forest Management. How will the project co-operate with existing activities of the SPC in the selected countries?
- Cooperation with other relevant international agencies: Vanuatu is a partner country of the NFP-Facility hosted by FAO. How will the project built on progress achieved concerning establishing a nfp in Vanuatu?
- Financing: Where will co-financing come from, and will the program still be feasible if there is less co-financing than projected?

34. Resource dependency: proposals for PAs should concern category VI areas ("Protected area with sustainable use of natural resources: protected area managed mainly for the sustainable use of natural ecosystems"), as local communities are heavily dependent on forest livelihoods and tourism-related income generating possibilities are fairly limited.

***COMMENTS FROM THE UNITED STATES***

35. We have concerns as to whether FAO has a comparative advantage with regard to the project and would like more information as to why they were selected. Given the project's focus on protected areas, it is not clear that FAO is the ideal agency to have the lead. FAO is not very active in conservation in the Pacific and their primary area of expertise is forestry. To the extent that there is a sustainable forest management component, the executing partners do not always include Forestry departments.

36. The four countries have relatively little in common and there is not much that makes this hang together as a single project. Even the unifying theme of “community engagement” is undermined by the radically different land tenure systems that characterize Fiji and Samoa, for example.

37. We find it odd that the proposal does not make use of SPC and SPREP, regional bodies with considerable expertise in community engagement and the substantive elements of the Project.

38. We would like the final project proposal to clarify how the Environment Departments in Fiji and Niue (which have very limited staff - 4-5 people) will have the capacity to manage this project.

39. The “value-added” discussion in section F of the proposal appears to misstate the prevailing degree of community engagement in decision-making on conservation. Far from being excluded, communities in at least Fiji, Vanuatu, and Samoa are the resource owners. Over 80% of the land available for conservation is under their control. This is what accounts for the small number and extent of PAs in these countries. It is presumptuous to say that, but for this project, PA development would languish. There are other on-going efforts to overcome the very substantial barriers to PA establishment. One example is Conservation International’s effort to establish a large forest reserve in the Sovi Basin on Fiji’s main island of Viti Levu.

40. The PIF also appears to underestimate the risks from this project. The risks are identified, but it substantially understates their level and overstates the potential for mitigation. For the most part the risks that are identified as medium to high, particularly with regard to families not wanting to give up land, village disputes and the momentum of land clearance are near certainties in most settings. In our view the actual risks are high to very high.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**6. Regional (Marshall Islands, Micronesia, Papua New Guinea, Cook Islands, Kiribati, Samoa, Tonga, Vanuatu, Niue): Prevention, Control and Management of Invasive Alien Species in the Pacific Islands [UNEP]**

***COMMENTS FROM GERMANY***

41. Germany supports this project without a need for further comments.

***COMMENTS FROM THE UNITED STATES***

42. We agree that IAS are “the most serious threat to biodiversity and sustainable development in the Pacific region,” and we can strongly support this project. UNEP has identified the right executing partners and the project includes most of the region, including some key countries. Some specific comments:

- We agree with the STAP review that the omission of Solomon Islands and New Caledonia is a real weakness, given the role of those jurisdictions as a haven and diffusion center for a number of destructive IAS. We would also add French Polynesia, Hawaii, and other U.S. territories. We encourage UNEP to build in some sort of coordination with activities in New Caledonia, French Polynesia, and U.S. territories (recognizing that GEF funding can’t be used in those territories.) It would be useful for executing partners to actively engage the relevant authorities in support of project component 2 (regional harmonization) since a revised Regional Invasive Species Strategy that does not incorporate the experience, and views, of those jurisdictions will be neither regional nor effective.
- The proposal might wish to consider whether and how to incorporate the Australian-drafted “guidelines” for invasive species management in the Pacific adopted at the most recent SPREP meeting (Pohnpei, September 2008.)
- In section G, on cost-effectiveness, the proposal looks forward to stimulating greater collaboration between two partnerships PILN and PII (the Pacific Invasives Learning Network and Pacific Invasives Initiative respectively), but these two organizations merged. Hopefully, this will strengthen cooperation between regional organizations (SPREP and SPC) in this area.
- In light of the PII and PILN merger, it might be wise to re-consider the “central” role of Pacific Roundtable’s Invasives Working Group, given the Roundtable’s history of weak performance in carrying out operational tasks.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**7. Regional (Chad, Gambia, Mali, Sierra Leone): SPWA Evolution of PA systems with regard to climatic, institutional, social, and economic conditions in the West Africa Region [UNEP]**

***COMMENTS FROM GERMANY***

43. Several aspects remain unclear in the PIF.

- Country selection: Why Gambia, Mali, Sierra Leone, Togo and Chad and not other countries?
- Regional approach: The selected countries are not neighbouring countries. Hence, there won't be any added value in terms of knowledge on how to manage transboundary PA. This is especially important regarding component 2.
- Financing: Where will co-financing come from, and will the program still be feasible if there is less co-financing than projected?

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**8. Bahamas: Building a Sustainable National Marine Protected Area Network [UNEP]**

*COMMENTS FROM GERMANY*

44. Germany supports this project without a need for further comments.

*COMMENTS FROM THE UNITED STATES*

45. This project has a capacity-building component that is potentially eligible for supplemental technical/financial assistance through the U.S. Fish and Wildlife Service's "Wildlife Without Borders Regional Program for Latin America and the Caribbean." We would appreciate it if UNEP could keep USFWS apprised of developments with the project. (The relevant point of contact is Mr. Bryan Hayum ([Brian\\_Hayum@fws.gov](mailto:Brian_Hayum@fws.gov)) who works within the Latin America and Caribbean branch.)

46. We can support this project, but would like to offer the following specific comments:

- The proposal must specify how it will conduct outreach and engagement of local people in MPA management.
- Item #2 of page 4 of the PIF indicates a current funding gap of \$7.1 million. It is not clear what is included in this gap and what is not – the gap may actually be higher if such elements as staff development and outreach are not included.
- The financial scenarios part of the project needs to be revised. The 10% rate of return under the optimistic scenario is not realistic. But even here, the funds would cover less than 10% of the shortfall.
- Proposals to capitalize the Trust fund should be based on more complete asset management scenarios, which in turn must be based on the most thorough understanding available of the funding gap to be addressed.
- It is not clear what training would be provided under Output #2 and how this will enhance management effectiveness.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**9. Colombia: Designing and Implementing a National Sub-System of Marine Protected Areas (SMPA) [UNDP]**

***COMMENTS FROM GERMANY***

47. Germany supports this project without a need for further comments.

***COMMENTS FROM THE UNITED STATES***

48. We are generally supportive of this proposal and can offer the following comments:

- The proposal needs to clarify how it will conduct outreach and engage local people, who may perceive the SMPA as a greater threat to their livelihoods than environmental degradation.
- If co-management agreements are to be developed (as indicated under output 3), then shouldn't other parties to those agreements, in addition to MPA staff, also receive training in management plan development, administration, and financial planning?
- We question whether a "30% improvement" in management capacity is enough to provide "adequate management" to 243,320 ha of coral reefs, 84,130ha of mangroves, and 13,608 ha of seagrass beds (as described in Output 3). This estimate needs to be subjected to more rigorous analysis.

49. This project has a capacity-building component that is potentially eligible for supplemental technical/financial assistance through the U.S. Fish and Wildlife Service's "Wildlife Without Borders Regional Program for Latin America and the Caribbean." We would appreciate it if UNDP could keep USFWS apprised of developments with the project. (The relevant point of contact is Mr. Bryan Hayum ([Brian.Hayum@fws.gov](mailto:Brian.Hayum@fws.gov)) who works within the Latin America and Caribbean branch.)

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**10. Ecuador: Sustainable Financing of Ecuador’s National System of Protected Areas (SNAP) and Associated Private and Community-Managed PA Subsystems [UNDP]**

***COMMENTS FROM GERMANY***

50. Germany supports this project without a need for further comments.

***COMMENTS FROM THE UNITED STATES***

51. Some specific comments:

- The results framework is weak and is an inadequate basis for a \$16 million investment. The expected outcomes are vague or are simply outputs. With three exceptions (increased management capacity at 8 sites, increased funding, increased financial sustainability), the outcomes are frameworks, enabling conditions, capacity-strengthening, recognition of importance, and consideration of PES.
- In addition to the revenue generation mechanisms proposed, attention should also be paid to enhancing revenue recovery, as current practices may also be insufficient to ensure that full revenues are being recovered from operators and individuals using SNAP resources.
- It will be highly important that these new mechanisms contemplate equitable revenue sharing with communities and other actors engaged in the management and protection of these areas.
- There is a contradiction regarding cofinancing. Section C indicates no bilateral funding, but includes \$1.5 M in GSTA funding, which is funded by USAID and is not expected to operate in Ecuador during the project period. UNDP should verify that TNC’s pledge of \$1 M does not include funds also committed to USAID’s GSTA program.

52. This project has a capacity-building component that is potentially eligible for supplemental technical/financial assistance through the U.S. Fish and Wildlife Service’s “Wildlife Without Borders Regional Program for Latin America and the Caribbean.” We would appreciate it if UNDP could keep USFWS apprised of developments with the project. (The relevant point of contact is Mr. Bryan Hayum ([Brian\\_Hayum@fws.gov](mailto:Brian_Hayum@fws.gov)) who works within the Latin America and Caribbean branch.)

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**11. India: BS Capacity Building on Biosafety for Implementation of the Cartagena Protocol - Phase II under the Biosafety Program [UNEP]**

***COMMENTS FROM GERMANY***

53. The proposal should clarify the relation between the project aiming to implement the CPB with its limited scope with regard to the range of GMOs and related activities covered and the projects objective to support the Indian GMO regulatory system aiming to cover all GMOs and related activities.

54. In addition to the STAP comment to consider the experiences made in other GEF financed biosafety projects, the project should be developed on the basis of on an independent evaluation of the former WB-GEF biosafety project to take into account lessons learnt, to fill remaining gaps, to build upon reached aims and to avoid repeated funding of comparable activities. Especially with regard to the activities related to the risk evaluation procedure and to GMO detection, the relation between the two projects should be clarified.

55. Furthermore, it appears to be problematic that the project "will facilitate the proposed establishment of a National Biotechnology Regulatory Authority" while the respective legislative process and consultations are still ongoing. Especially when the concept of the NBRA has raised considerable controversies within the public and scientific debate since it has been suggested in 2004. A GEF-funded biosafety project should not aim at taking national policy decisions into a specific direction but it - or parts of it - should be developed after these decisions have been taken in order to support their implementation.

56. It should be indicated if a private partner has already been identified to carry out the feasibility study for LMO detection as indicated in 3.1 and what amount of co-financing is expected.

57. Finally, we would like to know if it is also planned to support the participation of the public in biosafety decision making (ref. to CPB, art. 23), because currently the fifth component concentrates on public information only.

## ***COMMENTS FROM THE UNITED STATES***

### **General Comments**

58. This project does appear building GOI strengths in biosafety regulation, and some of the proposed activities are worthwhile and should improve biosafety capacity. However, there are several sections that seem to be duplicative of ongoing work or are not requirements of the Cartagena Protocol. As explained below, we feel these sections need to be either modified or removed.

1. The scope of the proposal to “ensure adequate protection of human health and biodiversity from potential harm arising from all LMO-related activities,” seems to be overly broad for a CPB capacity building activity. The emphasis on human health would funnel resources away from the obligations under the Protocol (i.e. environmental decision making) and into other areas (i.e. marketing issues like screening commodity imports for the presence of LMOs etc.). This also raises questions as to how the activities will be carried out.
2. The project does not appear aware of (or at least does not mention) other concurrent biosafety capacity building efforts (including some that USAID is funding). We believe several of the items in the work plan have already been completed, or are underway. If the proposal means to build off of these, or supplement ongoing activities, it should say so. Otherwise certain activities appear to be redundant and duplicative (see below for specific examples).
3. The proposal needs to distinguish between field trials and environmental release when it mentions risk assessment and risk evaluation.
4. The project justification mentions that it will help to establish the National Biotechnology Regulatory Authority. However, no mention is made of this in the activities listing. Please clarify how this project will support the NBRA.

### **Comments on specific sections**

#### Component I. Stocktaking Assessment

- 1.1 Needs Assessment:
  - Although the level of funding is low, India should already have a good indication of the various needs since it had recently completed a GEF World Bank project on biosafety.
  - The project should clarify what type of baseline information will be collected. Baseline on capacity? Agricultural impacts from LMOs?

## Component II. Strengthening Regulatory and Legal Framework

### 2.1 Risk Assessment and Management

- The USAID funded South Asia Biosafety Program is currently working on the issue of risk assessment with the Ministry of Environment. The proposal should acknowledge what activities are underway and clarify how this project will build on them.
- Some crop biology documents have already been developed. The proposal will need to be specific as to what crops will be addressed (see also STAP comment on this point).
- Baseline data on presence of wild relatives: The proposal should indicate which species they will examine – it will not be possible to gather data for all proposed LMOs. The project should also indicate how they will use these data in a manner that is relevant to risk assessment and management. Simply having data on wild relatives does not necessarily inform the risk assessment. Beyond presence of wild relatives, more relevant would be 1) whether the crop in question routinely crosses with wild relatives, 2) what are the consequences of this gene flow and 3) whether crop genes would be expected to persist in the wild relative populations.
- The project should go beyond just developing guidelines and procedures for specific types of risk. It needs to ensure that these guidelines and procedures are formally adopted by the appropriate bodies (RCGM and GEAC), for the project to be considered effective. The proposal should outline a work plan that indicates how any regulations and guidelines developed under this program will be carried through to the final stage and formally adopted.
- Indicators to measure gene flow. Again, this needs to focus on the consequences of gene flow. Simply measuring the gene flow will not inform the risk assessment process.

### 2.3 Handling, transport, packaging, and identification of LMOs

We find this section to be quite problematic and urge that it be removed. Neither of the activities appear to be obligations under the Protocol.

- Identity Preservation systems are completely unrelated to protecting biodiversity. Rather, they have to do with marketing.
- The testing and certification that is mentioned poses serious risks for disrupting trade in commodities for food, feed, and processing, which are not subject to the same requirements under the Protocol as material intended for environmental release.

### Component III. Strengthening Institutional Capacity

#### 3.1 Institutional Capacity Building

We question why LMO detection has been made the primary institutional capacity building need in India for biosafety at this time. This is the largest single line item in the proposal (\$850k GEF; \$2m GOI).

- India currently has considerable capacity for this already, both in the private sector and at universities and governmental research institutions.
- The price tag would indicate that they are planning to establish a new laboratory for this purpose.
- Given the capacity that already exists for LMO detection, this does not appear to be a necessary expense.

We recommend changing the focus of the institutional capacity building component. We believe a more important institutional capacity building need exists at the level of the regulatory agencies. Regulators are overworked and understaffed, and decision making bodies are often not well versed in their technical areas nor in project management or decision making.

- Long term institutional building and human resource development to improve institutional functioning and transparency for key agencies (DBT, MOEF) would advance biosafety more than strengthening detection laboratories.

### Component IV. Human Resource Development

#### 4.1 Training of trainers.

Our understanding is that training modules/manuals are already under development for conducting/evaluating risk assessment and management under the SABP project with MOEF. As such, this seems to be duplicative. The proposal should identify what activities are already underway and indicate how these will supplement rather than duplicate those.

There have already been a series of training modules/manuals developed on monitoring field trial management and compliance. These are being deployed through a series of state-level trainings, conducted in 2008 and 2009 by MOEF, DBT and BCIL (see table below for some illustrative dates and training content). This activity is duplicative and should be removed.

<p>Series of workshops on ‘Management and Monitoring of Field Trials of Genetically Modified Crops’. Organized by Department of Biotechnology (DBT), Ministry of Environment &amp; Forests (MoEF) and Biotech Consortium India Limited (BCIL).</p>	<p>Workshops are being held at the following SAUs:</p> <p>Bidhan Chandra Krishi Viswavidyalaya, Nadia, West Bengal (January 16, 2009)  Rajendra Agricultural University, Samastipur, Bihar (February 5, 2009)  Rajasthan Agricultural University, Bikaner (February 10, 2009)  Dr. Y.S. Parmar University of Horticulture and Forestry*  Tamil Nadu Agricultural University, Coimbatore, Tamil Nadu*  * Dates to be finalized.</p>
<p>Series of workshops for DBT nominees and IBSC members for ‘Strengthening Regulatory Compliance by IBSCs’. Organized by DBT and BCIL.</p>	<p>Workshops will be held as follows:</p> <p>University of Calcutta, Kolkata -(January 17, 2009)  The Atria Hotel, Bangalore -(January 23, 2009)  Kamatlingapur Hotel, Hyderabad -(January 24, 2009)  The Ambassador Hotel, New Delhi -(January 29, 2009)  M.S.S.S.R.F., Chennai -(February 2, 2009)</p>

## Component V. Information dissemination for enhancing public awareness

### 5.1 Information dissemination

Information dissemination is of a good thing, however, materials and communications should be developed that explain the biosafety regulatory process and enhance transparency, rather than just emphasizing the potential risks.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**12. Madagascar: Support to the Madagascar Foundation for Protected Areas and Biodiversity [World Bank]**

***COMMENTS FROM GERMANY***

59. Germany supports this project without a need for further comments.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**CLIMATE CHANGE**

**13. China: Provincial Energy Efficiency Scale-Up Program [World Bank]**

***COMMENTS FROM THE UNITED STATES***

60. We are glad to see the attention to energy pricing issues (component 2), which is essential if energy efficiency efforts are to be scaled up and replicated more widely. We would very much appreciate it if the final proposal could clarify where the major problems lie in terms of energy pricing and what the governments are specifically committing to do and the timetable for reform.

61. The proposal seems to be well targeted. Shanxi in particular seems to have issues that need to be addressed. The proposal should elaborate on whether market prices are being charged for coal and the timetable for reform.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**14. India- IND Energy Efficiency Improvements in Commercial Buildings - under the Programmatic Framework for Energy Efficiency [UNDP]**

***COMMENTS FROM THE UNITED STATES***

62. This is an important project to help India gain the capacity necessary to implement the energy and building codes on a mandatory basis. It would be helpful if UNDP could engage the Indian government on committing to a timetable for mandating implementation of the codes, starting perhaps with new government buildings and larger commercial buildings.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**15. India - IND Improving Energy Efficiency in the Indian Railway System - under the Programmatic Framework for Energy Efficiency [UNDP]**

***COMMENTS FROM THE UNITED STATES***

63. We have serious questions as to why the project is not targeting energy efficiency gains from traction as well as non-traction as this would seem to be an area ripe for efficiency gains. We would appreciate it if the proposal explained why it is not seeking to increase energy efficiency in traction and compare the cost effectiveness of investments in both.

64. We request that the final project document discuss electricity price implicit and explicit subsidies to India Railways. For instance, we believe that India Railways has significant outstanding unpaid dues to state boards of electricity.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**16. India - IND Promoting Energy Efficiency and Renewable Energy in Selected Micro SME Clusters in India – under the Programmatic Framework for Energy Efficiency [UNIDO]**

***COMMENTS FROM THE UNITED STATES***

65. We would like the project to explain relative cost effectiveness of investments in the micro-business sector compared with investments in other sectors? Is this the best way to generate energy and GHG savings compared to other investment options?

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**17. Pakistan: Pakistan Sustainable Transport Project [UNDP]**

*NO COMMENTS RECEIVED*

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**18. Russian Federation: RUS - Building Energy Efficiency in the North West of Russia  
[UNDP]**

***NO COMMENTS RECEIVED***

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**19. Turkey: Improving Energy Efficiency in Industry [UNDP/UNIDO]**

***COMMENTS FROM THE UNITED STATES***

66. We encourage this project to seek opportunities to collaborate and partner with the World Bank, IFC, and EBRD on its proposed energy efficiency investments in India under the Clean Technology Fund.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**PERSISTENT ORGANIC POLLUTANTS**

**20. Regional (Cambodia, Lao PDR, Mongolia, Philippines, Thailand): Demonstration of BAT and BEP in Fossil Fuel-fired Utility and Industrial Boilers in Response to the Stockholm Convention on POPs [UNIDO]**

*COMMENTS FROM GERMANY*

67. Comments from Germany

- In its present version, the project plan is not cost-effective.
- The available information on fossil-fuel utilities and industrial boilers seems to be inconsistent. There is no definition about the types of boilers that will be targeted by the intervention. The projects should focus on the most “inefficient boilers” rather than “all boilers in process”. It is highly unlikely that Indonesia should have only 4,655 boilers while the much smaller Lao PDR disposes of 24,741 “factories with boilers”. Proper targeting of action towards the most important UP-POPs contamination would greatly enhance the value of the project.
- Important sources of UP-POPs releases (Dioxins & Furans) into the environment will not be targeted, e.g. crematoriums.
- The project concept does not include approaches toward inducing factories towards investment for cleaner production technology. As large investments are needed, this may be the most important obstacles for factories. As it stands, the project might be unable to reduce releases of UP-POPs by a single unit.
- The project does not mention BAT and BEP guidelines that should be available in the Regional Basel Convention Centres. Collaboration with the Basel centres could provide synergies and reduce the GEF grant under component significantly.
- The project should focus on capacity building in one or two regional laboratories instead of thinly spread efforts towards upgrading national laboratories in all countries.
- The project concept would greatly benefit from reducing its scope. A thorough and comprehensive inventory, combined with carefully selected pilot interventions, could lay the ground for identifying priorities for upscaling at a later stage. This would involve a much smaller GEF grant for this pilot activity.

***COMMENTS FROM JAPAN***

68. This project is expected to be a good model about reduction of unintentional produced POPs (U-POPs) in other regions, as there are few other projects on U-POPs. Thus, this project should aim to deliver result which is general and enable other projects to refer to this project.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**21. Argentina: Environmentally Sound Management and Disposal of PCBs in Argentina  
[UNDP]**

***COMMENTS FROM GERMANY***

69. Ambiguities remain with regard to the final disposal of 2000 tons of PCB liquids and solids. Whereas this is mentioned under G5, the response to the GEF Secretariat's comments reads as follows "the construction of destruction facilities has been removed from the project". Further down, it reads "...the GEF...could potentially include co-financing of disposal activities...". There are similar ambiguities in the document with regard to interim storage. The cost-effectiveness of the entire project is unfavourable if there will be no reduction of global environmental risks through final disposal.

***COMMENTS FROM JAPAN***

70. The amount of funds from private sector (6,000,000 US dollars) occupies large proportion of total co-finance (7,000,000 US dollars). At the same time, there is no description about whether this foundation is by cash or in-kind. From the viewpoint of feasibility of this project, it is needed to define the amount of fund by cash and in-kind separately and elaborate on how to gain the fund from private sector surely.

71. "Project Components 4." in "Project Framework" needs 6,400,000 US dollars in total. Detailed explanation is needed on what kind of activity requires a fund of such amount. And also, in G5 of "Expected Outcome" in "Project Framework", it is written that this project aims to dispose 2,000 metric tons of PCB. It may be also needed to clarify concrete measure to achieve this outcome.

72. From the viewpoint of effectiveness, it is recommended that this project refers to other GEF project in South America region on PCB management.

***COMMENTS FROM THE UNITED STATES***

73. We believe this project, as outline, seems to be appropriate and meet Argentina's needs under the POPs convention. The Government of Argentina has done an initial inventory of PCBs but needs to work on the inventory management, law enforcement and PBS phase out activities.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**22. India: Environmentally Sound Management and final disposal of PCBs in India  
[UNIDO]**

***COMMENTS FROM GERMANY***

74. The submitted project is in its early stages of planning. Therefore, it is difficult to assess whether the concept is sound. The project concept – as it stands now – is too ambitious and too costly. Risks for achieving the expected outputs and outcomes are high.

75. It might be useful to start with a pilot project of considerably smaller size, e.g., within one province. A second phase would benefit from experiences and lessons learned for up-scaling in other provinces.

76. During further planning stages, the following issues need particular attention:

- ESM and disposal of PCB requires a large amount of co-financing, usually by the owners of PCB-contaminated equipment (government, parastatals and private sector). The co-financing commitment is a necessary prerequisite for achieving global benefits. However, co-financing has not yet been assured. At endorsement stage, full documentation of the commitment of owners of PCB-contaminated equipment should be available. The project plan needs milestones that allow UNIDO to **discontinue the project once co-financing is lacking** or delayed.
- There is insufficient documentation on the available infrastructure for intermediate storage and final disposal of PCB in India. If infrastructure is not yet available, it will be unlikely to achieve the expected outputs within the four-year time frame of the project.
- There is insufficient documentation how the most important initial step of the project will be conducted. An initial survey of the location and the level of contamination of the equipment is needed as early as possible. It will allow full documentation in a database system, and prevent “leaking” of PCB into the environment where it may be unavailable for ESM and disposal.
- At endorsement stage, full information on PCB quantities and available infrastructure for ESM and final disposal of PCB should be available for each of the then selected three provinces.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/20)**

**23. Peru: Environmentally Sound Management and Disposal of PCBs [UNIDO]**

***COMMENTS FROM GERMANY***

77. Preventing uncontrolled releases of POPs into the environment from the suggested local separation of PCB-contaminated equipment into liquid waste, solid waste and metal parts requires a sophisticated infrastructure. It is not clear from the available document whether financing is foreseen in the budget.

***COMMENTS FROM JAPAN***

78. It seems that “Expected Outcome” is vague and lacks concreteness (ex. what the timeframe of the project is and how many facilities of what scale would be needed to dispose 1,000 metric tons of PCB etc.). To make sure that this project reaches the “Expected Outcome”, it may be needed to plan this project in more detail.

79. The amount of funds from private sector (4,300,000 US dollars) occupies large proportion of total co-finance (5, 320,000 US dollars). From the viewpoint of feasibility of this project, clarification is needed on measure to gain the fund from private sector surely.

80. As is written in PIF of GEF project (GEF ID 3269 “Environmentally Sound Management and Disposal of PCBs in Argentina”), it would be useful for the effective implementation of this project to make reference to other GEF projects in the same region, namely in South America, on PCB management.

***COMMENTS FROM THE UNITED STATES***

81. The project will have a beneficial impact by enhancing monitoring and reporting through building capacity for laboratory analyses of PCBs. However, the full proposal would benefit from more detailed information on the establishment of the dismantling facility and final disposal of PCB-contaminated transformers and wastes. While the proposed facility in Peru clearly addresses the problem of the absence of local facilities for PCB waste disposal, the full proposal should provide more detailed information describing the establishment of this facility and how environmentally sound management and proper disposal of obsolete stocks will be achieved.