



GLOBAL ENVIRONMENT FACILITY
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COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE
LDCF/SCCF DECEMBER 2018
WORK PROGRAM

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the LDCF/SCCF December 2018 Work Program

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**DECEMBER 2018 GEF WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE: LDCF/SCCF.C.25)**

1. Chad: Strengthening rural and urban resilience to climate change and variability by the provision of water supply and sanitation in Chad (AfDB) (Project Financing: \$8,700,000) GEF ID = 10089

✓ **Germany's Comments**

Germany approves the following PIF in the work program but requests that the following comments are taken into account:

Germany welcomes the proposal aiming strengthen rural and urban resilience to climate change and variability by the provision of water supply and sanitation in Chad. Germany appreciates that the project clearly intends to scale-up the impacts of the AfDB financed baseline project for water supply and sanitation and in rural and peri-urban communities for Climate Adaptation. The project document clearly details the vulnerability of the population and the benefits of adaptation interventions in this context. At the same time, Germany has following comments that should be addressed:

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Germany appreciates that the project targets different rural, and peri-urban areas in a comprehensive manner, as the communities most vulnerable to climate change impacts often reside in these areas. However, the document insufficiently outlines which interventions will take place in what area. The provision of technology (e.g. solar powered production boreholes) only contributes to adaptation if embedded in an institutional context that incentivizes responsible and sustainable usage. Furthermore, the challenges linked to adaptation interventions vastly differ by area. To assess the **adaptation-relevance of the different interventions, it is highly recommended that clear overview of the location of the different interventions is included in the document. For example, the Project Map could be updated to be more legible, or additional information on the location of the interventions could be provided in a tabular form.**
- In its current form, the proposal, though referring to **the Chad Version 2030 and the National Adaptation Program of Action**, only partly relates to Chad's Intended Nationally Determined Contribution (INDC) and the policies included therein. **It is therefore highly recommended to update the respective sections on "long-term solutions and barriers to achieving it" as well as the consistency with national priorities to confirm the project's alignment with the INDC of Chad.**

- Although the proposal is strong in outlining the additionally of the project to the already ongoing AfDB baseline project, the **proposal would benefit for a due reflection of other activities to strengthen the provision of water supply and sanitation**. Examples include the EU’s Water and Sanitation Programme in N’Djaména (PEAN), or the GIZs regional initiative “Adapting to climate change in the Lake Chad Basin” executed by the Lake Chad Basin Commission (LCBC).
- Germany welcomes that reducing gender inequalities is an integral part of the projects objectives. However, the initial assessment of “adaptation problems” and “underlying causes” does not specifically highlight the link between gender inequality and vulnerability to climate change impacts in water supply and sanitation. Given that health and water are the projects’ primary sectors of activity, **more detailed insights into the underlying causes for gender inequality in these sectors could be provided**.
- The proposal states several risks for delivering the project outcomes. Germany would welcome a **further elaboration of these risks, as for example the risk of creating parallel processes** and duplication of efforts with other national processes, such as the NAP process or measures for the implementation of the country’s NDC. The risk overview would also profit from a **probability and impact rating**.

2. Guinea-Bissau: Strengthening climate information and early warning systems for climate resilient development and adaptation to climate change in Guinea Bissau (UNDP) (Project Financing: \$6,000,000) GEF ID = 10105

✓ **Germany’s Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes the proposal, which aims to strengthen climate monitoring capabilities, early warning systems and information for responding to climate shocks and planning adaptation to climate change in Guinea Bissau. Germany particularly welcomes that the project contributes to respond to the climate information needs identified through the NAPA and that will set solid foundations for the successful implementation of several priorities of the INDC and Guinea Bissau 2025 development strategy.

Germany would like to make the following recommendations on how the project proposal document could be further refined:

- Germany welcomes the distinct focus of the proposal on the private sector. As the proposal outlines, the private sector will benefit from improved access to climate and weather data. The private sector is also meant to contribute financially to the provisioning of such services, thereby enabling the emergence of a market for climate services in Guinea Bissau that will help to generate consequent revenues to support the sustainability of the climate information and

early warning system. However, Germany would welcome that it is described more clearly which private entities are able and willing to pay for such services, and that it becomes more clear whether sufficient resources can be mobilized to ensure sustainability of climate services. This matter should be addressed under “risks”.

- Germany recommends that the project proposal describes how **newly installed equipment can be protected against damage or being stolen**. This matter can be addressed under “risks”. Building ownership among local communities can be one promising approach in this context.
- Regarding the **capacity building activities** Germany recommends that the proposal specifies the concrete target audience (types and approximate number of institutions and stakeholders) to be trained under subcomponents 1.7, 2.1 and 2.2 of the project, also noting that and how women will be addressed by trainings.

✓ **Belgium’s Comments**

Belgium’s comments were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Beginning next year EU will invest in early warning systems for agriculture and the proposal seems rather expensive in comparison – Please justify
- Is our impression correct that the co-financing would come from other projects (agriculture, fisheries, rice) that would profit from the EWS and don’t we need co-financing for the meteorological systems themselves? – Please advise
- The sustainability of the systems doesn’t look very well secured – Please elaborate on sustainability considerations

3. Mauritania: Climate change adaptation and livelihoods in three arid regions of Mauritania (UNEP) (Project Financing: \$4,416,210) GEF ID = 10103

✓ **Canada’s Comments**

- In general, there are no concerns with the proposed project in Mauritania. The project presented under the LDCF is complementary with many operational initiatives financed by Canada—for example, a humanitarian project financed by the FAO, which aims to improve food security in various regions of Mauritania.
- The initiative also aligns with national priorities in Mauritania related to climate change—notably the Plan d’action national d’adaptation aux changements climatiques and the Stratégie nationale du développement durable
- From the development perspective, the issues of resilience and capacity development remain important, particularly in the context of the Sahel. We

recommend to take into account two considerations for the benefit of the project:

- Although the proposal takes into account the specific vulnerability of women, it is important for the activities, indicators and results to clearly demonstrate how the voice of women will be effectively taken into account and which interventions regarding a sustainable change in behaviour will be put into place; and
- There are multiple similar projects in place also financed by the GEF. It is imperative to ensure coordination and convergence of all activities in order to generate benefits and avoid unnecessary overlap.

✓ *Germany's Comments*

Germany welcomes the proposal aiming to strengthen the adaptive capacity and ultimately climate-resilience of communities and government in the arid Mauritanian wilayas of Adrar, Inchiri and Trarza through the introduction of ecosystem-based adaptation (EbA) approaches. The project is based on a clear rationale and has potential to complement various already ongoing activities in the country, aiming at addressing climate-resilience.

Germany would like to make the following recommendations on how the project proposal document could be further refined:

- Germany welcomes the alignment of the project objectives with the objectives of the GEF Programming Strategy on Climate Change Adaptation for the LDCF and SCCF (2018-2022). Regarding the innovative character of the project, the PIF mentions that there have been only very limited investments in climate change adaptation in arid ecosystems so far. **Germany recommends elaborating further on the reasons why arid ecosystems have not or rarely been targeted so far**, which could further entail **additional risks for the project implementation. Furthermore, Germany would welcome an additional reference to Objective 2** “Mainstreaming Climate Change Adaptation and Resilience for Systemic Impact” of the GEF Programming Strategy on CCA.
- Germany appreciates that the project is consistent with national strategies and plans, most notably the NAPA. However, Germany recommends to include a more detailed reference on **how the proposal is aligned with and contributes to achieving the country's NDC. Germany would also highly appreciate further elaboration of the embedding of the project into the NAP process**, which started in 2015 and is still ongoing, amongst others with support by the project “Increase Capacity for Adaptation to Climate Change in Rural Areas (ACCMR)”.
- Germany highly appreciates that the project targets local communities as beneficiaries, notably through capacity building trainings on EbA measures under Component 2. However, the PIF is lacking an elaboration on how the proposed EbA interventions as well as the foreseen “community-level climate

action plans” (CAP) will be **embedded into both local planning processes and the local institutional set-up**. In this context, the proposal refers to so called Associations for Local Associations for the Management of Natural Resources (AGLC) (output 2.2) as local implementation structures, although these do not exist in the target areas. **It is strongly recommended to not only invite community representatives to participate in the the Project Steering Committee, but to include them more substantially in the steering of the project to ensure ownership and guidance.**

- Linked to the point above, the coordination section states that the central level of the MEDD is foreseen to be responsible for the operation coordination, while the DREDD are not considered in the management structure. Given the strong lack of vertical integration in the MEDD between central and regional level, **Germany recommends to account for an operational coordination mechanism that is sufficiently anchored in the respective target regions.**
- **Furthermore, it is recommended to further clarify the redistribution of roles**, as it appears that the mandate of the entirely new National Observation Center for Arid Areas (CNOEZA) is limited to fulfill its tasks to execute EbA interventions on the local level. The complementarity with the role of the DREDD therefore should be clarified to avoid overlaps.
- Germany welcomes the considerations on gender equality and women's empowerment within the proposal. Although the objective of equal participation in training and awareness raising activities are welcomed, **it is recommended that the proposal should go further and consider women not only as recipients of the capacity building measures, but also include their capacities and specific knowledge as “agents of change” in decision-making processes.** The substantive inclusion of gender focal points and women’s groups is therefore highly recommended. Furthermore, **gender-disaggregated data should not only document the participation rate of women in the project, but should also be designed in a manner that considers the specific needs and capacities of women and other vulnerable groups.**
- While the approach Ecosystem-based Adaptation (EbA) is more and more acknowledged in the international development communities (see e.g. documentation of the GIZ Global Project EbA), **the proposal needs to elaborate its conceptual foundation and reasoning in contrast to other approaches** as well as a concretization on the project implementation level and in the local context.
- The proposal already elaborates on the coordination with relevant existing projects and initiatives in the country. This overview is however **not up to date**, since e.g. the project ACCMR executed by GIZ has terminated in May 2018. Germany therefore recommends to updated this overview and to take into account the following experiences from ACCMR for improved knowledge management:
 - A comprehensive documentation of project documents such as manuals of ACCMR,

- A comprehensive documentation of implementation and capitalization documents on the approach Decentralised Ressources Management (GDRN) of the previous GIZ programme ProGRN,
- Experiences of the terminated GIZ Programme on the Climate Change Adaptation in Coastal Cities (ACCVC) that has gained and documented valuable experiences of dune stabilization,
- Experiences of the previous GIZ Good Governance Programme (PBG) on support to decentralization processes including the elaboration of local development plans.
- **Germany furthermore encourages to make reference to existing proven achievement** of the approach Decentralised Ressources Management with the creation of 39 Local Associations for Natural Resources Management (AGLC) in the south of Mauritania (Guidimakha and Hodh El Gharbi) under the previous GIZ programme ProGRN and the ongoing programme CorMCT. It is further recommended to collaborate with CorMCT in order to seek synergies with the existing and documented experiences with AGLCs for replication and adaption in the target areas as well as to extend EbA interventions in the (semi-)arid region of Hodh El Gharbi. This may help to address the lack of locally legitimized governance structures and the prevailing “tragedy of the commons.”

4. Mozambique: Scaling up local adaptation and climate-risk informed planning for resilient livelihoods (UNDP) (Project Financing: \$8,932,420) GEF ID = 10100

✓ Germany’s Comments

Germany welcomes the PIF’s objective “to strengthen the capacity of rural agro-pastoral communities and sub-national governments to plan for and adapt to climate change”. The project is based on a clear rationale and has potential to complement various ongoing activities in the country, that aim to address climate-resilience.

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The project is in line with the existing national climate policy framework, including the National Adaptation Programme of Action (NAPA), the Intended Nationally Determined Contribution (INDC), the National Adaptation Plan (NAP), the National Climate Change Adaptation and Mitigation Strategy (NCCAMS) and the recently developed Local Adaptation Plans (LAPs). Germany appreciates in particular that the project intends to build on baseline projects in local economic development and agricultural development and to bridge the gap between national and local adaptation strategies. There is a lot of potential for synergies, but also for overlaps. **Germany kindly suggests adding more detail on how to avoid the potential risk of duplication with other donor projects that strengthen capacities in adaptation planning. Additionally, Germany asks kindly to report on the LAP selection once it has started.**

- The selection of the regions in which the LAPs are to be implemented is well elaborated. Germany welcomes in particular the capitalization on prior experiences from previous programmes and the complementation of baseline programmes. **Germany highly recommends also building on the experience of a previous GIZ program “Adaptation to Climate Change in Mozambique” from 2012-2015 as the goals, outcomes and outputs as well as the implementation approach (especially climate-proofing) were similar.**
- Germany appreciates that the budget is broken down by components, and that co-financing arrangements are listed and described with a fair amount of detail. **However, it remains unclear how the budgeted amounts for the proposal have been generated. Germany would welcome a further cost breakdown (e.g., on activity level) and/or more clarification with regards to the calculations. Additionally, it is advisable to reconsider whether the co-financing of the government which itself is being supported by the European Development Fund should not be considered here. Germany advises to differentiate more clearly between government co-financing and international co-financing.**
- Germany welcomes the wide array of clearly defined output indicators presented in the project proposal. However, measured outputs are most likely going to diverge by regions and their specific vulnerabilities in the face of climate change. **Germany would welcome that the respective outputs of each region are provided once the districts are selected and upon project completion,**
- Germany welcomes the integration of gender considerations and its guidance by regional studies during the PPG process. Gender considerations are mentioned in both Component 1 and 2, and exact numbers of gender-segregated beneficiaries are stated. **However, Germany kindly asks to elaborate further on the integration of and the benefits for women and vulnerable groups in the project proposal.**
- Germany acknowledges the potential for scaling-up outlined in the project proposal, as well as the objective to stimulate adoption of adaptation techniques and innovations by exchanging experiences with other districts. However, replicating innovations from one district to another can pose difficulties due to different ecological, climatic and geographic settings, thus making shared learning between regions limited. **Germany would welcome a more specific explanation on how upscaling between regions could be achieved (e.g. through workshops).**
- Capacity building measures are divided into three sub-components (for local level decision-makers to utilize risk assessment, to access financial support, for integrated adaptation measures into sectoral planning at sub-national level) which is welcomed. However, it is unclear which measures will occur in what context. Germany suggests that a further elaboration on how respective components are going to be implemented in the five target regions would be beneficial in order to understand how activities align with local vulnerabilities.

✓ **Belgium's Comments**

Belgium's comments were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- clarify the target group;
- what's the link/collaboration with UNDCF work in the regions: EU and Sweden are cited as co-financiers but are funding also UNDCF programme LOCAL
- FAO will appoint a focal point for adaptation in the context of MITADER, so is taken into account?

5. **Rwanda: Ecosystems/Landscape approach to climate proof the Rural Settlement Program of Rwanda (UNDP) (Project Financing: \$8,355,638) GEF ID = 10096**

✓ **Germany's Comments**

Germany welcomes the proposal, which aims to apply an ecosystems/landscape approach to climate proof the Rural Settlement Program of Rwanda. Germany particularly welcomes that already clear and sound outline of the different project components have been improved by addressing remaining issues of co-financing and additionality provisions. In addition, it is clearly described in the proposal how gender equality and women inclusion could benefit from the project. Germany would like to make the following recommendations on how the project proposal document should be further refined to address remaining gaps to ensure political consistency with other climate policy processes. Germany also acknowledges the Secretariats comment that at CEO endorsement stage, further information on complementarity with an envisaged Green Climate Fund (GCF) project is requested.

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Germany welcomes that the proposal updated the co-financing contributions and outlines what contributions are "investment mobilized" and which ones are not. Germany also appreciates that specific details will be worked out during the PPG phase on how the co-financing will be delivered as part of the the Rural Resettlement Programme of the country. Germany would welcome if the proposal could provide **more concrete information on the Rural Resettlement Programme in the proposal.**
- Germany requests **to further clarify how the climate-risk assessment methods** and information provided to support adaptation planning as an ongoing practice as output of project component 1 **will complement activities already supported by NAP since information on the latter** in section 7 on the consistency of the proposal with National Priorities is lacking.
- Germany would also welcome further information in the proposal **on how NDC**

implementation will benefit from the project. Currently there is no major reference to the NDC in the PIF and it remains unclear how political consistency can be ensured.

- Germany welcomes the **capacity building and knowledge management** activities foreseen by the PIF in order to integrate climate risk reduction in the Rwandan Imidugudu program. However, given the progressive framework, Germany kindly recommends **exploring the potentials of digital technologies during the project preparation phase by consulting:**
 - the Rwandan Ministry of ICT & Innovation,
 - the Rwanda Information Society Authority, and
 - the project “Digital Solutions for Sustainable Development” implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH

✓ **Belgium’s Comments**

Belgium’s comments were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- The programme “rural resettlements” has been supported by One-UN for a long time, but demographic pressure and land fragmentation justify the project objectives
- The regions Gakenke and Kirehe are well chosen, but surprisingly the biggest refugee camp in Kirehe isn’t mentioned
- The approach looks coherent but the activities are not very detailed
- The main comment is high cost, 6,35 million GEF and 22,36 million co-financing, for 500 families and if such a high cost can be replicated in the Green Village/Rural settlements of Rwanda.

6. Sudan: Sustainable Natural Resources Management Project –AF (WB) (Project Financing: \$5,936,073) GEF ID = 10083

✓ **Germany’s Comments**

Germany requests the Secretariat to send draft final project documents for Council review four weeks prior to CEO endorsement.

Germany welcomes the proposal, which aims to reduce environmental degradation and vulnerability of rural poor and marginalized people vis-à-vis climate change in Gedarif and Khartoum through the adoption of sustainable land and water management practices in targeted landscapes. Germany welcomes that the activities for which additional funding is requested, are fully consistent with the Sudan National Action Plan and its Disaster Risk Management Strategy. The project advances the objectives of

Sudan's INDC and NAPA. However, Germany requests that several requirements are taken into account during the design of the final project proposal.

Requirements to be taken into account during the design of the final project proposal:

- The **PIF is not complete**, i.e. particularly Part II, chapter 1a) Project Justification is missing. Germany used for its evaluation additional documents provided by the GEF, including “Combined Project Information Document/Integrated Safeguards Data Sheet (PID/ISDS)”. However, there are **major differences between the combined PID/ISDS and PIF** regarding the names and sub-components / activities of the four project components, particularly for components 1 and 3. Germany therefore requests that these **discrepancies be resolved and that a more complete PIF is provided**.
- The PIF contains only very general information about the way **stakeholders will be involved** in the project and how to ensure that implementation at the local level **is inclusive and builds local ownership**. There is also very little information about how **gender dimensions considerations** will be included in the project design. Germany would highly welcome further information on all three matters, including reference to lessons learned from previous and ongoing phases of the project.
- Germany suggests that the project proposal could be strengthened by **providing additional information on climate change specific dimensions** such as vulnerability of people and natural resources to climate change or on the additionality of the project in terms of climate change adaptation benefits. This would strengthen the climate adaptation justification.

Comments based on information provided in the “Combined Project Information Document/Integrated Safeguards Data Sheet (PID/ISDS)”:

- **Component 1** is meant to “build on the Great Green Wall investments in Sudan and neighboring countries, under the framework of the Sahel and West Africa Program (SAWAP) as well as other, relevant initiatives, to expand highly successful investments to two additional states, including Gedarif and Khartoum.” Several measures are referred to, incl. establishment of demonstration farms, support for land use management and zoning plan processes, etc. Considering limited resources requested for this component (USD 700.000), Germany would welcome a more detailed description of specific measures to be implemented under this component and how they will make use of lessons learned and resources from ongoing activities under SAWAP as well as other relevant initiatives.
- Moreover, component 1 will complement development partner-led interventions, including from FAO in North Darfur. Germany would welcome further information on **potential overlaps and how duplication of activities** can be avoided.
- Very little information is available on foreseen measures under **component 3**. Germany would strongly suggest expanding the description of this component.

✓ **Canada's Comments**

- Sudan is experiencing severe economic hardship exacerbated by climate-related shocks such as drought. This project builds on previous work and directly addresses climate vulnerability at the community level.
- The project would align well with the work of international NGOs and some UN agencies like WFP.
- This type of work is highly relevant for Sudan and we endorse this work.

✓ **United Kingdom Comments**

United Kingdom's comments were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- The UK feels more work is needed on the project document. It uses traditional technical approaches, innovations are minimal and sustainability improbable

Summary of key points:

- The project approach is essentially traditional. It is exclusively about technical/physical change and should also look at addressing institutional issues to support sustainability objectives of the programme.
- There has been no independent (mid-term) evaluation for the project to provide additional evidence to underpin to programme design and approach.
- There has been limited sharing of information and engagement with other stakeholders in Sudan.
- Khartoum State as the choice for the poorest and most vulnerable is questionable. It targets those classified as very poor.
- It frequently refers to “innovation” whereas the project applies approaches that have generally been proved to be ineffective. Example: tree planting in FNC forest reserves and paying for forest guards during the project cycle.
- The GoS is committed to scaling up project activities”, the question is whether GoS will allocate their own resources to support or will it be solely dependent on WB project funding.
- Principal among the new/additional project activities proposed are water extracting measures for crop production without any reference to water resources management. Without taking on board the water resources available and the catchment use of water it is impossible to make any programme sustainable in the long term, especially in areas outside the Nile Basin. There is a strong encouragement to include an Integrated Water Resource Management approach or work with partner in country implementing IWRM (Eg UKaid programme in Gadaref)
- The ToC needs to be reviewed: nomadic tribes/traditional people..... pressures caused by these people on scarce natural resources p.7). We do not agree with

assessment of the situation in country. In Gedaref for instance, the pressure of unsustainable land use is primarily from ‘investors’ as many millions of hectares have been expropriated from local land users and then used in often unsustainable ways (‘shifting cultivation with tractors’).

- Baseline co-financing context: The proposed project as designed will leverage and complement projects....., the European Union-funded project “Natural Resources Management for Sustainable Livelihoods – East Darfur State” etc. This is a UNEP implemented project and they are not aware of anything of the kind. East Darfur is geographically different from the intended project locations in the East and centre of Sudan, therefore not a comparable evidence base to use.
- There have been previous efforts to exchange information with SSNRMP and other key NRM projects in the context of joint lessons learning. We would encourage the WB to use this project as an opportunity to build/ support coordination and information sharing efforts in country.
- Institutional and policy reform.... developing effective inter-agency collaboration mechanisms. What the project has done to achieve this since 2014 is not clear nor is how is it linking into existing coordination mechanisms.

Potential Linkages and Synergies:

- This programme has the potential to foster more catalytic impacts through better coordination with other relevant programmes in Sudan. UK is keen to engage and link up its programmes with the WB to strengthen this proposal to draw out lessons, best practice, data etc. These include:
 - A. provide FNC (state and federal level managers), WB management & project senior staff with good practice experience so that innovations get a better chance - through the Network, written 'guidelines', major partner projects that provide inspiration, incl. field level exchange.
 - B. tailor-made interaction: UNEP are willing to support their project sites on the one hand to verify and adjust good practice recommendations and identify what blocks application (mostly institutional, not technical).
 - C. Khartoum based influencing supporting WB missions in country and with updates when not ;example at present of an IFAD 'natural resources governance project' identification mission for 67M\$, and the IFAD country plan, COSOP
 - D. Indirectly and on the longer term, the institutional reform support will put innovative Sudanese senior staff in a stronger/more senior position, speak out and influence (more sustainability beyond ADAPT influencing). Think about the senior FNC women, for instance.