Dear Ms. Barbut,

Attached, please find Germany's comments on the LDCF/SCCF-Work Program November 2011.

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

Best regards,

Matthias Seiche
on behalf of
Frank Fass-Metz
Germany approves the Work Program but asks that the following comments with regard to the following PIFs are taken into account:

1) Climate Resilience through Conservation Agriculture (Moldova)
   GEF ID = 4366

   1) Germany asks for clarification on how conservation agriculture will be introduced in the Moldovan farming sector. No details are given on how the planned training sessions for smallholders will be organised. The Moldovan farm sector is characterised by a large number of small scale farmers and the organisational degree in cooperatives or associations is extremely weak. Because of the negative experience with forced cooperative farming during the Soviet time, Moldovan farmers are very reluctant to any kind of cooperation. Therefore, it needs major efforts in organisational development to work with farmers groups, which is necessary to effectively approach smallholders.

   2) The introduction of conservation agriculture as a means to enhance climate resilience in general makes sense, but is by far not sufficient and can be only one component of a larger "package". Additionally, further measures should be considered, as e.g. the introduction of new varieties and breeds, intercropping techniques to reduce erosion, the introduction of efficient irrigation techniques (e.g. drip irrigation) or the diversification of the farm economies. The project proposal should also address risks to the success of conservation agriculture as a mean to have a major impact on climate resilience: the introduction of conservation agriculture requires in the first years a significantly higher input of herbicides or labour to control weeds, besides the additional costs for herbicides this can cause negative environmental and climate impacts. Therefore, we ask to take into consideration in further project proposal that introducing a new and complex approach like conservation agriculture needs strong engagement in training and developing a support structure for farmers (e.g. extension services).

   3) Germany requests more details on relevant stakeholders and how to approach them. At its actual phase, the proposal does not adequately reflect the key stakeholders. The role of agricultural NGOs who are performing as agricultural extension services (funded by donor projects) is not specified. They are still weak and need specialised train-the-trainers support in order to perform better. Universities and agricultural schools are not mentioned in the proposal.

   4) We strongly recommend, during project implementation, to coordinate activities with the project "Modernisation of the Moldovan Agricultural Sector" funded by German bilateral cooperation. The project works with development-oriented smallholders and farmers groups. 2008 - 2010 GIZ implemented a project in southern Moldova to introduce climate adaptation measures into farming practices. The GEF funded activity could benefit from these experiences.

2) Climate Resilient Coastal Protection and Management (India)
   GEF ID = 4536

   1) Germany approves the strong focus on soft measures, community participation and joint planning, climate proofing and integration into policy at all levels.

   2) Germany kindly asks to clarify why the vulnerability assessment is limited to investments supported by another ADB project ("Climate change vulnerability assessments undertaken for selected coastal zones in the target states linked to investments supported by the ADB Sustainable Coastal Protection and Management Investment Program (SCPMIP)", p. 3). This project seems to go beyond the SCPMIP ADB project with the expected outcome "increased awareness and capacity of sector
agencies at National and State levels regarding the assessment of climate change impacts and adaptation options for coastal protection interventions. However, SCPMIP seems to be the baseline project for this. Specification on eventual criteria for selecting certain sites would be helpful.

3) As to the PIF, GEF/SCCF support will align closely with State Action Plans on Climate Change where they have been completed and support their finalization (p. 7). Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH supported the development of State Action plans in 16 other states. Options for up-scaling should be considered. GIZ recently started a small scale demonstration project to test stabilisation of embankments. Exchanges would be fruitful regarding the GEF/SCCF project’s focus on designing coastal erosion protection infrastructure (p. 15), particularly on soft measures.

3) Adaptation to Climate Impacts in Water Regulation and Supply for the Area of Chingaza - Sumapaz - Guerrero (Colombia), GEF ID = to be assigned by GEFSEC

1) Germany recommends feedback to and cooperation with the Direction of Climate Change of the Colombian Ministry of Environment (MADS) in order to support the definition and construction of the National Adaptation Plan of Colombia.

2) We notice that in Colombia various different initiatives are under way to establish monitoring systems of climate change. Since the system to be designed in the framework of the present project would be limited only to the region we strongly recommend to seek close collaboration with the Direction of Climate Change of the Colombian Environment Ministry in order to streamline the development of this monitoring system with the other ones and thus use project funds more efficiently.

3) We recommend seeking information exchange and considering cooperation with the Ecosystem based Adaptation Solutions Programme implemented by Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH on behalf of German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) after January 2012. As well we recommend cooperation and information exchange with the two regional GIZ programmes “Adaptation to Climate Change in the Andes” and “Trinational Initiatives in National Parks” on behalf of the German Federal Ministry of Economic Cooperation and Development (BMZ).

4) Strengthening the Resilience of Post Conflict Recovery and Development to Climate Change Risks in Sri Lanka (Sri Lanka) GEF ID = 4863

1) Germany commends the highlighted importance of gender aspects. Women have been identified as particularly vulnerable to violence and to the negative impacts of climate change in Sri Lanka. However, in our view the project proposal does not yet elaborate gender-sensitive measures. We recommend developing such measures for a successful implementation.

2) Further project development should also ensure a close donor coordination and work-sharing between donors for cross-sectoral projects as well as a conflict-sensitive design of the contributions of Post Conflict Needs Assessments (PCNA). We also recommend to integrate “do no harm” criteria into the proposed project and to focus especially on poverty areas.

3) The proposed project should also take livelihood activities regarding the needs of various marginalized communities and potential conflict situations into consideration.
   - Consideration of vulnerable communities:
     - not yet integrated refugees, returnees in transit situation and resettled returnees
Comments by Germany on LDCF/SCCF-Work Program November 2011

- ex-combatants
- war widows, orphans
- marginalized Tamil and Muslim groups

- Consideration of recurrent cycles of political and criminal violence:
  - dominance of economic activity by the military in the Northern and Eastern Province
  - involvement of the military in land conflicts (such as resettlement of returnees)
  - Control of rehabilitation programs by the Presidential Task Force (PTF), close cooperation with the military

5) Competitiveness and Sustainable Rural Development Project in the Northern Zone (Northern Horizons-GEF) (Honduras), GEF ID = to be assigned by GEFSEC

1) Germany commends the consideration of the country’s private sector for value chain consolidation and market access promotion as well as the partnership building with the private sector. However it should be defined who exactly is targeted by the project besides small producers’ organizations and how the project will address the private sector.

2) The first project component aiming at capacity building and awareness raising mentions the specific outcome of 50% of agro-business putting into practice climate resilient plans. The target group is also micro-enterprises. In this context we question if “plans” are the appropriate tool to mainstream climate change.

3) The project will collect and provide climate-related information to end-users and relevant government institutions. Past experiences have shown that it is a real challenge to provide information in a way that is actually useful to different target groups. In this context some recent experiences of first assessing in a participative manner which type of information is needed especially for endusers might be an interesting approach also for this project.

4) Further project development should lead to a more concrete quantification of the expected outcomes, e.g. concretizing expressions like “up to” (p. 2) and giving some baselines (especially for the expected outcome 2.1.1, p. 2).

6) Climate Change Adaptation to Reduce Land Degradation in Fragile Micro-Watersheds Located in the Municipalities of Texistepeque and Candelaria de la Frontera (El Salvador), GEF ID = 4616

1) Role of involved institutions: The project proposal mentions quite a few institutions. Please specify for further project development how a close collaboration with the involved institutions can be ensured as well as their presence in the region.

2) We also recommend to exchange information and to consider cooperation with the project “Tropical forest protection and water shed management in the Trifinio region” implemented by Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH on behalf of the German Federal Ministry of Economic Cooperation and Development (BMZ).

3) GIZ supports due to the mentioned project the tri-national Commission „Plan Trifinio“ (Comisión Trinacional del Plan Trifinio, CTPT) and local partners with the implementation of sustainable use of resources. The project proposal does not refer to the CTPT as stakeholder in the region. For further project development please consider a potential role of the CTPT.
Dear GEF Secretariat Program Coordination Registry:

Thank you for the opportunity to review the Joint Work Program for the LDCF and SCCF, submitted for Council Approval at its meeting on November 10th in Washington, D.C. As we stated at this November 10th meeting, we approve the work program.

We would, however, like to provide the following written comments to the Secretariat for further clarification, and with a view toward strengthening the proposals as they are developed for CEO endorsement.

Greater Mekong Subregion Forests and Biodiversity Program (Greater Mekong Subregion)

The United States requests clearer explanation of how much buy-in this project has from China, specifically the Chinese State Forestry Administration, and how the project will leverage Chinese equities and capabilities, given that China is the largest player of forestry and biodiversity in the region, with two thirds of forest land cover in the region belonging to China. While the goal of regional cooperation and leveraging of resources is laudable, China’s active participation in such a project is unclear in the PIF.

In addition, with respect to Outcome 1.4, the United States requests further detail on whether the project will help make alternative sources of income available to local communities that have relied on poaching and illegal forest trade.

Shire Natural Ecosystem Management Project (Malawi)

The United States encourages the World Bank to consider “soft” measures to complement the “hard” measures outlined under Component C (flood management). There is a growing body of evidence that hard measures can be made much more effective at reducing vulnerability and increasing resilience when coupled with soft measures...
such as strengthening understanding of local communities about climate change impacts, risks, vulnerability and adaptation options and building their capacity to reduce risks and adapt to climate variability and change. Such soft measures can include community- and school-based flood management training/education, early warning systems, flood evacuation simulation drills, dissemination of information through community radio, mobile phones, etc., and the development of flood risk reduction materials for school curricula.

Climate Resilience Through Conservation Agriculture (Moldova)

The United States recommends that the project facilitate learning and adoption of both manual, hoe-based conservation agriculture, which is suitable for small-holders with small plot sizes, as well as traction-based conservation agriculture (either animal-drawn or tractor-drawn), which is a suitable technique for those farmers who have larger fields. Traction-based conservation agriculture will require making specialized equipment (rippers, seeders, etc.) available to farmers. Some sort of credit facility may be needed to encourage farmers to purchase this equipment to enable mechanized-conservation agriculture adoption.

In addition, the United States recommends that IFAD build in climate risk, impact and vulnerability assessments into the project. These assessments should be the foundation upon which adaptation measures, using conservation agriculture, are identified and implemented, together with targeted beneficiaries.

Climate Change Adaptation to Reduce Land Degradation in Fragile Micro-Watersheds Located in the Municipalities of Texistepque and Candelaria de la Frontera (El Salvador)

The United States requests clarification on how the various target groups relate to one another. For example, who are the 750 people (1.2.4) who will be trained in climate change impacts and vulnerability identification, and how will they differ, if at all, from the 1,500 households with climate resilient production systems (1.3.1), the 375 households trained in shared decision making, construction, management and maintenance of rainwater catchment systems (3.1.2), the 50% of rural households and small-scale rural producers involved in DRR (4.1.1), and the local communities integrated into municipal and departmental structures (4.3.2)?

Adaptation to Climate Impacts in Water Regulation and Supply for the Area of Chingaza-Sumapaz-Guerrero (Colombia)

We assume that the PIF has not identified specific adaptation measures because IADB intends to identify specific measures together with relevant stakeholders. Please confirm that this assumption is correct.

In addition, the United States requests that IADB give careful consideration to how it will help translate the climate data and information generated under Component 1, Knowledge Management, so that this information can be understood and actionable by users. How will relevant ministries, counties and communities receive information about weather and climate for better decision-making? How will the project ensure that the information is driven by the needs of the users and delivered through appropriate channels? Who are the potential knowledge providers and users in Colombia and region?

Competitiveness and Sustainable Rural Development Project in the Northern Zone (Honduras)

We are pleased to see that Component 2 includes activities to ensure that rural infrastructure is climate proofed and maintained. We would like to better understand how timely and adequate maintenance will be sustained, e.g., what will be the incentives for users?

We look forward to your responses to the above as well as to seeing the feedback incorporated in the project proposals at the CEO endorsement stage of this process.

Thank you and kind regards,
Christina

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This email is UNCLASSIFIED.