

## Government of Canada's Comments on Draft GEF-6 Programming Directions

### Overall Comments

- The overall focus should continue to be on the legally-binding instruments for which the GEF is the financial mechanism, with some strategic programming on voluntary initiatives, guided by the generation of co-benefits.
- GEF programming should be closely aligned with MEA CoP guidance and allow countries the necessary flexibility to prioritize activities to reflect their specific needs by focal area.
- The inclusion of synergies, private sector partnerships, performance-based financing in the focal area strategies are welcomed.
- The themes identified in the GEF's Strategic Positioning document, such as private sector partnerships and differentiated engagement of middle-income countries, should be more systematically integrated into the draft focal area strategies.

*Comments by Focal Area Strategy follow.*

## Draft GEF-6 Biodiversity Strategy

### General Comments:

- The Biodiversity Focal Area Strategy should be reorganized around the 5 Goals of the CBDs Strategic Plan (rather than the 4 objectives outlined) and the 20 Aichi Biodiversity Targets (rather than the 11 program areas identified), consistent with the CBD COP11 Guidance to the GEF (CBD Decision XI/5, para8).
- While there is a need to prioritize within the 20 Aichi Biodiversity Targets, and some of the suggested priorities would be appropriate to achieve the greatest global biodiversity benefit, the 11 program areas as a group are too narrow in scope and geographic coverage. As a result, they would not permit countries to identify their own greatest area of need. Priorities must be consistent with a country-driven process.
- Projects that have co-benefits (e.g., for climate change and biodiversity, or chemicals and biodiversity) should be identified and prioritized in a manner consistent with a country-driven process, as a way to maximize environmental benefits for biodiversity and other GEF focal areas. Of note, some of the Aichi Targets identify co-benefits within the targets themselves; for example, Target 15 identifies co-benefits of climate change mitigation and combating desertification.
- Where the proposed program does not line up with the Aichi Targets and/or is tangential to the CBD implementation, the program should be replaced with one of the elements critical to the Aichi Biodiversity program.
- As discussed under Program 6, efficiencies can be gained by providing support to the Cartagena Protocol through regional or sub-regional projects. This idea should be pursued throughout several of the Aichi Biodiversity Targets.
- The Biodiversity Results Framework in Annex 1 should be replaced with the Aichi Biodiversity Goals and Targets. In many cases, the indicators used for monitoring progress in the Strategic Plan should also be appropriate GEF indicators, with GEF programming contributing to the achievement of the targets.

### Specific Comments:

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5	9	The GEF should be careful not to place undue emphasis on protected areas; while relevant to Aichi Target 11, protected areas alone are not enough to reverse biodiversity loss.
6	15	Since mainstreaming is critical to achieving the targets, and raising awareness is critical to mainstreaming, the GEF should fund awareness raising activities. Is the GEF considering integrating awareness raising activities into projects?

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	16	The GEF should provide support to produce the 6 <sup>th</sup> national report, and this should support be made more prominent in the document, reflecting the fact the national reports are a critical accounting of how Parties are implementing the CBD programmes, goals and targets.
7	Fig 1	This Figure needs to be revised to include all of the Aichi Biodiversity Target on the left, with the goals of the Strategic Plan and then within each target there could be an emphasis on priorities for that target. The priorities must be broad enough that each country can identify its most important biodiversity issues for action.
8-12	17-29	The focus and rationale for priorities in protected areas are fine, but could be reframed in terms of Target 11 and cross-linked to other Targets (e.g., Target 10).
12	33	Program 3 supports landscape/seascape level resource management and/or threat reduction strategies that strengthen protected area integrity. While it supports the ecosystem approach of the CBD, the Program should be clarified or refined to establish clear linkages to the Aichi Targets.
13-15	34-40	While iconic mammals of Africa are threatened, and enforcement and consumer demand need to be regulated, given the magnitude of the work to be done to achieve the Aichi Targets, the GEF should focus on those Targets, and not on the priority set out under Program 4 that fall within CITES mandate.  There are other examples of significantly declining species (e.g., shorebirds), where targeted funds could have significant benefits, in particular in halting the degradation of habitat and restoring already degraded habitat, while supporting attainment of Aichi Target 15.
15	41	Invasive alien species (IAS) are a critical issue for biodiversity, and are identified by Aichi Target 9. While IAS are a significant issue for SIDS, and a priority should be given to addressing IAS in SIDS, programming must be able to take advantage of significant opportunities for global biodiversity impact outside of islands, including in marine areas and grasslands, to maximize the global impact. IAS can have devastating ecological and economic impacts, and the least expensive approaches are preventing the pathways of introduction, in SIDS and elsewhere.
16		Although the Implementation of the Cartagena Protocol on Biosafety is not an Aichi Target, given that the Protocol has 166 Parties, the GEF should fund its implementation. The Nagoya Protocol implementation is reflected in Aichi target 16.
17-18	51-62	Program 7 (coral reefs) is directly related to Aichi Target 10. Coral reefs face a multitude of stressors - as highlighted in the most recent analysis of threats (World Resource Institute 2011) – and overfishing is the greatest local pressure followed by destructive fishing (explosives and poisons), so the GEF could have an impact on reducing these local threats. However, the chief threat is the effects of climate change, including increasing temperature and ocean acidification, which can be mitigated through reductions in CO2 emissions.  Table 2 (p. 18) shows that SE Asia has the greatest percent of threatened reefs; however, it does not show that the population living within 100m of reefs is higher in SE Asia than elsewhere. Thus, the biggest biodiversity impact could be through

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		reducing local threats to coral reefs in the Pacific and Indian Oceans, which have had the biggest increase in threats, particularly from overfishing and destructive fishing practices. While it is a priority to maintain the integrity and function of globally significant coral reef systems, it may make sense to expand this priority to three endangered ecosystems, to include native grasslands and wetlands (including mangroves and sea grass).
17	51	Coral reefs are known to shelter 25% of fish in the ocean, not, as stated, contain 25% of the species in the ocean; please correct. Given that the greatest diversity of coral reefs is in the Indo-Pacific region, the Program should give a priority to countries in that region.
17	52	The latest survey of global coral reefs appears to be the World Resource Institute 2011 study, <i>Reefs at Risk Revisited</i> , which is more recent than the 2008 study cited.
19-21	63-69	This directly links to Aichi Target 13, and prioritizes genetic resources for agriculture. The programming question for the GEF is whether this is already covered as a priority by FAO; if it is, the GEF should usefully focus on Aichi Targets that do not have funding elsewhere.
22-24	70 - 78	This links to the Nagoya Protocol implementation, Aichi Target 16. Paragraph 76 – Please clarify whose participation in the ABS Clearinghouse would be funded and how, and whether this is an obligation under the Nagoya Protocol. Paragraph 77 – Given the Protocol is not yet in force, and it is not clear whether there is a funding obligation for these valuation exercises, are the activities named appropriate? Of note, the exercises may have already been completed through previous biodiversity valuation exercises. Paragraph 78 – Please delete; NPIF funding should be merged into broader NP/ABS resources. There is no need to continue to separate these pools of resources.
24-25	79 - 82	Addressing this need would be important to supporting Aichi Target 2.
25 - 28	83-94	Program 11 is linked to target 4 (mainstreaming) and to the REDD program, which is mostly a climate change (CC) mitigation program. Thus, it should be a co-benefit program funded jointly under the CC and BD focal areas.

## **Draft GEF-6 Climate Change (CC) Mitigation Strategy**

### Comments:

- “Catalyzing systemic impacts through synergistic multi-focal area initiatives” is the most valuable and important element in the draft CC programming strategy.
- To help focus the Strategy, the GEF should concentrate on areas of clear, comparative advantage (such as multi-focal area initiatives) and maximizing the impact of programming. The latter consideration should include programming, for example, related to reducing short-lived forcers like methane, some HFCs and black carbon, given the relatively quick and strong global environmental benefits from such measures.
- The technology transfer component is the largest part of the CC focal area, but it is not clear what the GEF’s role will be in this area going forward with the emergence of the GCF and other organizations, including the UNEP/UNFCCC CTCN. For the next version, please clarify the GEF’s relative position and possible “niche” for GEF-6.
- Please clarify how the GEF’s changing relationship with middle-income countries (MICs) might be manifested within this focal area in a more systematic way, including by reflecting on capital constraints consistent with significant incremental financing.
- Please elaborate on how private sector and innovative financing might be further enhanced within the CC focal area programming in a more systematic way.
- Please further develop “Objective 1: Promote Innovation and Technology Transfer, Program 2b: ‘Demonstrating a performance based mechanism of payment for emission reductions’”; specifically, please provide additional details on how this interesting program could be delivered in practice.
- Please clarify “Objective 1: Promote Innovation and Technology Transfer, Program 2c on ‘Scoring on countries’ readiness for low carbon investment.” For example, please explain: (i) what “public de-risking policies” means; (ii) how a Global Commons Scorecard would facilitate further investment in low carbon development; and, (iii) if, under the second part of the proposed program, the GEF provides the investment funds, then how the Scorecard is enabling investment.
- The draft strategy establishes clearer links between NAMAs and GEF support. These could be strengthened further, given the critical importance of support flowing to those countries that are pledging and committing actions under the UNFCCC for which support needs have been identified.
- The focus placed on mainstreaming UNFCCC reporting and planning, and building capacity for this, is welcomed and could be further strengthened.

## Draft GEF-6 Chemicals Strategy

### General Comments:

- The draft Strategy outlines an integrated chemicals strategy, which is a welcome shift. In moving to an integrated approach, it is essential that the activities/programs specific to MEA obligations drive the Strategy, with the focus on legally binding instruments. The Strategy should be informed by the MEAs, and should therefore be cautious about getting ahead of MEAs and proposing programs that go beyond the actions agreed upon by Parties within the context of the MEAs. Funding of voluntary initiatives should be considered through a strategic lens, which explicitly considers 'co-benefits' with the view of strengthening the GEF's impact.
- In considering the UNEP Governing Council's invitation to the GEF for an integrated approach to chemical and waste, a practical and appropriate response would be integrating the two other pillars of that approach – i.e., industry involvement and mainstreaming – in a cross-cutting manner throughout GEF-6 chemicals projects and programs. This should be prioritized vis-à-vis adding significant Basel, Rotterdam and SAICM activities.
- To keep the Strategy focused, the Strategy should recognize that there are numerous international processes that conduct risk assessment or analyze appropriate technologies for environmentally sound management, rather than propose GEF funding.
- While LDCs and SIDs may need some special support, it is not clear that a separate “strategic objective” is warranted. Instead, consideration could be given to incorporating the Chemicals Focal Area into the STAR for GEF-6, thus addressing the resource issue for LDCs and SIDs.
- The regional implementation suggested in the draft Strategy should not divert funding from global MEAs to regional MEAs.

### Specific Comments:

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110	9.i	With respect to the reference to the GCO “approaches” to sound chemicals management, the priority should be focused on the implementation of the Conventions for which the GEF is the funding mechanism, including the Minamata Convention.
111	9.v	There is an assumption about the agreed “priority emerging chemical issues of global concern”, suggesting that these should be part of the funding going forward; however, the priority issues are not yet agreed.
	9.v	Please note that while the paragraph states that joint ordinary COPs took place in 2011, this only happened in ex-COP form.
112		Box 1 states that the GEF only finances former USSR countries in the Montreal Protocol, but Program 4 (p.125) notes assisting Article 5 Parties (who are funded

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		under the MP). Please clarify.
113		The text at the bottom of the page implies that SAICM has “parties” by stating that “[e]ach Party must implement actions to meet its obligations under these treaties”. Please clarify.
115	15	Please clarify regarding the most important source of environmental emissions and/or releases; the current general use of the term “releases” is counterproductive in this regard. Under the mercury convention, “emissions” is the term for releases to air, and “releases” is the term used for releases to land and water. The recent UNEP study still points to the fact that air emissions are by far the most important source, and these come from Article 10 sources as well as artisanal and small-scale gold mining (ASGM).
	16	This paragraph states that “other emerging chemicals and waste issues will add additional targets for intervention”. In our view, the GEF’s global priorities are those related to: first, the MEAs with the GEF as the financial mechanism; second, other MEAs; and, finally, non-binding instruments could be considered. New issues for GEF funding should come out of a collective process at the global level, not country by country.
116	22	The text suggests closer integration with global supply chains, which goes beyond the existing treaties.
	25	The reference to “industrial processes” is inaccurate and atmospheric emissions are not mentioned; if the intended reference was “atmospheric emissions”, this should be corrected.
117	27	Ozone programming should respond to an analysis of ODS consumption left versus projects already approved.
120	38	Given that NIPs are optional under the mercury convention, the GEF should limit its support to NIPs by focusing only on streamlined NIPs. With respect to the reference to joint reporting, it is of note – and the text should be clear – that this is not done internationally and each treaty has different reporting requirements.
	39	Please clarify which “findings of convention reporting” would be funded.
121	41.i	The number of countries receiving support to prepare convention reports and national plans is not an appropriate indicator; this is particularly the case for NIPs, as they are not required under the mercury convention.
	42-44	Program 2 (monitoring) does not recognized that the SC (and now Mercury) have a global monitoring system funded under the Convention’s budget; monitoring is done regionally, and not in every country. Thus, it is not appropriate to use the number of monitoring sites per country as an indicator.
	42	The statement: “this program is required to measure the effectiveness of the conventions”, is inaccurate, since the Convention COP of SC (and, in the future, the Mercury) is required to do this task. There is further reference to assisting the decision-making of the conventions; has GEF funded the GMP of SC in the past?
122	48-51	For Program 1 (demonstrate and deploy environmentally safe technologies), the GEF should take into account the guidance that the COPs are currently drafting on a range

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		of BAT/BEP.
	49	Regarding the “innovative approaches to remediating contaminated sites”, remediation is not a requirement of the Stockholm or mercury treaty, and priority funding should relate to obligations. For completeness, the SC requires Parties to endeavour to identify such sites. Should such sites be remediated with support from the GEF, this work should be done in an environmentally sound manner.
123	51	We note that there is an indicator to measure the number of countries implementing SAICM priorities that generate global environmental benefits, but not the number of countries implementing the treaties that have been agreed at the global level to provide global benefits.
124	58	<ul style="list-style-type: none"> <li>• There is a potential to achieve sizeable GHG reductions through ODS reductions; this opportunity should be further highlighted and strengthened</li> </ul>
125	61	<ul style="list-style-type: none"> <li>• The document makes reference to the ODS production sector. Of the CEITs, Russia is the only ODS-producing country. Has Russia received funding to address this production? Is it eligible for funding? Does the GEF fund ODS production phase-out? If so, on what definition of eligible incremental costs is the funding based?</li> <li>• There appear to be two programs that address reporting under the Montreal Protocol; please comment on the possible redundancy.</li> <li>• Program 4 discusses ODS phase-out in CEITs as well as “assisting” Article 5 countries under MP to achieve climate mitigation benefits. We agree with the proposed generation of ozone-climate co-benefits through MLF and GEF programming, though question whether this might be better placed under the climate change mitigation focal area (assuming it involves support for all developing countries, and not just CEITs). Please comment.</li> </ul>



## **Integrated Approach to the Global Environmental Commons in Support of Sustainable Development**

### General Comments:

- Indeed, the GEF should look at cross-cutting programmatic approaches on key themes. This could facilitate additional co-benefits and cooperative work with other environment and non-environment actors, both internationally and domestically, especially for work on forests, food security and sustainable cities. In terms of operationalizing such an approach, please clarify how this would differ from promoting more multi-focal area projects and programs, and elaborate on the need for a new, special pilot strategy.
- It is of note that Rio +20 did not include a commitment for financial assistance to deal with these issues. As such, the GEF needs to ensure that MEA obligations and related activities continue to be the focus, even if programming is done through cross-cutting, multi-focal area projects and programs.