



COMPILATION OF COMMENTS SUBMITTED BY COUNCIL MEMBERS
ON THE GEF TRUST FUND JUNE 2023 WORK PROGRAM

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEFTF June 2023 Work Program

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**JUNE 2023 GEFTF WORK PROGRAM (REFERENCE: GEF/C.64/04/Rev.01):
COMMENTS FROM COUNCIL MEMBERS**

INTEGRATED PROGRAMS

1. **Regional (Bolivia, Brazil, Colombia, Ecuador, Peru, Suriname, Venezuela). *Amazon Sustainable Landscapes Program Phase 3.* (GEFID: 11198) Agencies: WWF-US, CI, World Bank, FAO, UNDP. GEF Project Financing: \$88,644,185. Co-financing: \$557,827,180.**

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Canada Comments**

Deforestation/Small-Scale Farming/Soil (MSF):

- Recommend including a new indicator that shows the net impact of the Programs in halting and reversing ecosystem loss, in particular deforestation, in particular for the Amazon, Congo, and Critical Forest Biome Integrated Program and the Net-Zero Nature-Positive Accelerator Program.
- The current core indicators can show only the positive impacts of the Programs (e.g. CI3, CI4, CI5 ad CI6) but fail to consider any negative change such as deforestation leakage (i.e. improved protection/conservation in one area leading to more deforestation in other or new areas), which may be directly or indirectly related to policy reforms, a whole-of-government strategy, integrated approaches or others that the GEF Programs try to achieve.
- GEF should consider including a new core indicator for the two Programs, or at least a project level-indicator for the projects that aim to halt and reverse deforestation:
 - a net change in forest area (considering both forest gain and loss) in the target landscapes, or
 - a change in area affected by deforestation in the target landscapes

Supporting smallholder farmers through the Amazon, Congo, and Critical Forest Biome Integrated Program (CFB IP):

- We want to underscore that supporting smallholder farmers is critical for halting deforestation and inclusive transition toward deforestation-free supply chains. And, this Program must ensure that smallholder farmers in deforestation-risk commodity chains

receive as much attention as other local community groups receive through this IP. In particular for the private sector engagement, we recommend the projects under this IP reinforce technical, financial and legal support for smallholder farmers within deforestation-risk commodity chains in order to help them adopt innovative, low-cost biodiversity-friendly practices and secure their legal rights (ToC 3).

✓ **Germany Comments**

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

Germany welcomes this proposal, which addresses the multiple sources of pressure on forest and freshwater ecosystems in the Amazon through an integrated landscape approach. The PFD thoroughly explains the need for a coordinated regional, multisectoral, multi-actor and participatory approach, and lays out solution strategies. The PFD is comprehensive in listing how the program builds up on lessons learned from the previous phases (ASL 1 and 2) and seeks to enhance existing national and regional initiatives.

Suggestions for improvements to be made during the drafting of the final program proposal:

- With view to the projects funded by KfW listed among “indicative co-financing” (p. 91 + 92), Germany concurs that the projects are of relevance for the proposal yet requests that they should not be considered a co-financing, given that Germany as a member of the GEF council cannot co-finance GEF projects.
- We recommend not to leave aside the landscapes prioritized in ASL1 and ASL2 to consolidate the progress and achievements of those phases.
- For an efficient and effective delivery, the program needs to work with local and regional governments and strengthen their capacities to implement their legal mandates. When programming activities at the local level, it is important to consider the local authorities’ capacities, in terms of time and personnel.
- Germany appreciates that the program seeks to increase investments for sustainable landscapes. We recommend including a long-term strategy to secure investments beyond program duration.
- We understand that indicators are based on the GEF-8 results measurement framework. However, some indicators need to in addition consider: (1) How will improved protected area management be measured (e.g. via METT)? (3) and (4): What is the difference between land “under restoration” and with “improved practices”? How will the program ensure that improved practices have a positive impact on conservation and biodiversity?
- Germany welcomes the emphasis of IPLC participation in decision making and the recognition of their important role in ecosystem conservation. We recommend that

IPLCs are included in all four components of the program, and that structural problems are also addressed (particularly land titling, threats of displacement and illicit activities).

- Given the multitude of donor initiatives on conservation and landscapes management in the Amazon, thorough coordination and alignment is of utmost importance. We recommend using established channels (e.g., national donor coordination roundtables) where possible.

✓ **Japan Comments**

- On projects related to supply chain of tropical timbers, we hope that the implementing agencies can leverage lessons learnt from comparable projects conducted by the International Tropical Timber Organization, which is a focal agency for supply chain management under Collaborative Partnership on Forests (CPF). Since ITTO is providing relevant data for FAO, utilizing its expertise would be beneficial for the multi-stakeholder dialogue as part of knowledge management and learning, while eliminating duplication of effort.

✓ **United Kingdom Comments**

- If possible, can there be more explicit consideration of political economy? And detail of how such factors will be identified and managed across a diverse range of social and economic contexts?

2. Regional (Angola, Cameroon, Central African Republic, Congo DR, Equatorial Guinea, Sao Tome and Principe). Congo Critical Forest Biome Integrated Program. (GEFID: 11241) Agencies: IFAD, CI, IUCN, UNEP. GEF Project Financing: \$56,259,439. Co-financing: \$428,640,177.

✓ **Canada Comments**

Deforestation/Small-Scale Farming/Soil (MSF):

- Recommend including a new indicator that shows the net impact of the Programs in halting and reversing ecosystem loss, in particular deforestation, in particular for the Amazon, Congo, and Critical Forest Biome Integrated Program and the Net-Zero Nature-Positive Accelerator Program.
- The current core indicators can show only the positive impacts of the Programs (e.g. CI3, CI4, CI5 ad CI6) but fail to consider any negative change such as deforestation leakage (i.e. improved protection/conservation in one area leading to more deforestation in other or new areas), which may be directly or indirectly related to policy reforms, a whole-of-government strategy, integrated approaches or others that the GEF Programs try to achieve.
- GEF should consider including a new core indicator for the two Programs, or at least a project level-indicator for the projects that aim to halt and reverse deforestation:
 - a net change in forest area (considering both forest gain and loss) in the target landscapes, or

- a change in area affected by deforestation in the target landscapes

Supporting smallholder farmers through the Amazon, Congo, and Critical Forest Biome Integrated Program (CFB IP):

- We want to underscore that supporting smallholder farmers is critical for halting deforestation and inclusive transition toward deforestation-free supply chains. And, this Program must ensure that smallholder farmers in deforestation-risk commodity chains receive as much attention as other local community groups receive through this IP. In particular for the private sector engagement, we recommend the projects under this IP reinforce technical, financial and legal support for smallholder farmers within deforestation-risk commodity chains in order to help them adopt innovative, low-cost biodiversity-friendly practices and secure their legal rights (ToC 3).

We have two recommendations for projects to be implemented in the Democratic Republic of Congo:

1. Include the aspect of using the endogenous knowledge of local communities and indigenous peoples in addition to the benefits derived from genetic manipulation.
 2. Build capacity and equip stakeholders. To date, the DRC's efforts to achieve the "30x30" objective have reached 15.08% through protected areas, community forestry and APACs.
- To this end, we suggest consulting the facts and recommendations raised by participants at the latest "National Dialogue to capitalize on other effective conservation measures by area and recognize the role of local communities in the Democratic Republic of Congo, Kinshasa, May 09-11, 2023" organized by the International Union for Conservation of Nature, IUCN, in collaboration with the GIZ Biodiversity and Sustainable Forest Management Program.

✓ **Germany Comments**

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

Germany welcomes this proposal, which seeks contributing to the improvement of the conservation and effective governance of critical landscapes in the Congo Basin Tropical Rainforest Biome. At the same time, Germany has the following comments that it requests being addressed in the next phase of finalizing the program proposal.

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

- Germany appreciates that the program is mainly targeting governance issues in some of the COMIFAC partner countries, having different approaches for conservation and climate finance around some selected protection landscapes while working on improved livelihoods for indigenous peoples and local communities (IPLC).

- Nevertheless, the results and lessons learned from GEF IP7 seem not to be clearly reflected in the theory of change of the GEF IP8. The document remains general in the description of what should be done. The level of a regional approach seems to be ambitious, whilst defining six geographical intervention areas only. Germany requests to consider a reformulation of the rationale linking the selected landscapes and the regional level in a more comprehensive manner.
- Germany appreciates the high diversity of the partner institutions. Yet it appears surprising that the partner institutions in the beneficiary countries are more often concerned with environment or agricultural interventions than with forestry issues. MINFOF in Cameroon, e.g., is not associated with MINEPDED even though this IP ultimately focuses on sustainable forest management. COMIFAC is mentioned several times as a partner initiative on which some of the interventions and funding of this IP will be targeted. Therefore, Germany requests relating the mentioned partner institutions to the fields of interventions of the IP and to ensure effective collaboration on the different levels.
- The measurement of the program impacts, mentioned in the M&E section, will rely on recent, exhaustive, and accurate baseline data. Germany asks for the incorporation of findings from the recent regional FAO study on drivers of deforestation and forest degradation in the Congo Basin to render the M&E system less costly and more efficient.
- There are several bi- and multilateral projects and programs in execution and /or under preparation (EU, KfW, GIZ, CAFI, etc.) in the Congo Basin that seem to have similar objectives. Germany asks to design the mechanisms foreseen for coordinating intensively with those projects and programs to benefit from their learnings, avoid duplicating efforts and generate synergies.
- There are some general institutional and political descriptions in the PFD that Germany requests checking for accuracy e.g., year of CBFP creation, CAFI funds available in 2021, outcomes from COP28 and the One Forest Summit in Libreville (03/23).

✓ **Japan Comments**

- On projects related to supply chain of tropical timbers, we hope that the implementing agencies can leverage lessons learnt from comparable projects conducted by the International Tropical Timber Organization, which is a focal agency for supply chain management under Collaborative Partnership on Forests (CPF). Since ITTO is providing relevant data for FAO, utilizing its expertise would be beneficial for the multi-stakeholder dialogue as part of knowledge management and learning, while eliminating duplication of effort.

✓ **Switzerland Comments**

The rationale for the Congo IP remains sound.

However, **additional information on the selection (rationale), in particular on the selection of the site/landscape of the child projects, on how the child projects are embedded in the**

respective national strategies and on the respective risk assessments of the different child projects would be appreciated and needed for a comprehensive assessment of the IP.

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

3. Regional (Lao PDR, Papua New Guinea, Thailand). Indo-Malaya Critical Forest Biome Integrated Program. (GEFID: 11102). Agency: FAO, IUCN, UNDP. GEF Project Financing: \$38,216,208. Co-financing: \$185,597,817.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

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Deforestation/Small-Scale Farming/Soil (MSF):

- Recommend including a new indicator that shows the net impact of the Programs in halting and reversing ecosystem loss, in particular deforestation, in particular for the Amazon, Congo, and Critical Forest Biome Integrated Program and the Net-Zero Nature-Positive Accelerator Program.
- The current core indicators can show only the positive impacts of the Programs (e.g. CI3, CI4, CI5 ad CI6) but fail to consider any negative change such as deforestation leakage (i.e. improved protection/conservation in one area leading to more deforestation in other or new areas), which may be directly or indirectly related to policy reforms, a whole-of-government strategy, integrated approaches or others that the GEF Programs try to achieve.
- GEF should consider including a new core indicator for the two Programs, or at least a project level-indicator for the projects that aim to halt and reverse deforestation:
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✓ **Germany Comments**

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

Germany welcomes this proposal, that seeks to contribute to the conservation and restoration of primary forests in three countries of the Indo-Malaya Forest Biome. At the same time, Germany has the following comments that it requests being addressed in the next phase of finalizing the program proposal.

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

- Germany appreciates that the program proposal includes both the establishment of new protected areas and the improvement of the management effectiveness of existing ones. Regarding the establishment of new protected areas, we ask to evaluate if it is possible to ensure that they are not “paper parks”, e.g. by verifying if a management plan exists or if a minimum of staff and budget are available.
- Germany also welcomes that the program seeks to improve political framework conditions, such as tenure security. Different donor initiatives already work on tenure security, e.g. in Lao PDR. Therefore, Germany requests that the program ensures proper coordination and alignment.
- We understand that the indicators are based on the GEF-8 results measurement framework. Nonetheless, some indicators are not fully clear and need to be spelled out in a more comprehensive and concise way, in particular the following:
 - 3.1 and 3.2: What is the difference between “restored land” and “improved practices”?
 - 3.3: How is forest degradation (in relation to IP&LCs practices) defined?
 - 3.5: How are “green forest-based value chains” defined, and which criteria will ensure that the impact of these activities on primary forests are minimal?

- We welcome that IP&LCs are included as key allies for conservation, and that the program seeks to enhance their livelihoods in the targeted geographical areas. Nonetheless, Germany asks that IP&LCs are addressed in all components of the program, given the vast percentage of intact forest landscapes (IFL) on their land (p. 11 of PFD). Furthermore, the program needs to address structural disadvantages for IPLCs, such as land rights, participation in political processes and the threat of forced displacement.
- Moreover, Germany recommends that the information on the ownership and the specific roles of the national executing entities in the three countries are spelled out more concretely. How can the implementation by national executing be assured and aligned with national strategies? Furthermore, political will is stated as a necessary underlying condition. While this is fully understandable, it also needs to be defined which contribution the program can make to build political alliances.
- Lastly, Germany welcomes that component 4 seeks to generate sufficient funding for protected areas and restoration. However, the program also needs to include the establishment and implementation of a long-term strategy to secure funding beyond the duration of the intervention.

✓ **Switzerland Comments**

The IP remains timely and highly relevant for the ecologically balanced socio-economic development of the Indo-Malaya eco-region. The IP is well linked to ongoing national strategies for sustainable development, forestry and biodiversity conservation in all participating countries, as well as regional and national forestry and conservation initiatives and regional investment platforms.

The following questions/issues should be addressed in the development of the child project:

- Explain the key factors and causes of primary forest loss in each of the three focus countries at the PPG stage,
- Explain more about how the project and its partners will address the biggest driver of forest loss – agricultural expansion (and in the case of PNG – mining) - through regulations, community and business engagement and other measures;
- Consider measures to address illegal timber production and smuggling at local level (through civil society patrols, remote sensing, etc.) and at higher levels (supply chains, buyers of Indo-Malaysian forest products).

✓ **United Kingdom Comments**

- Would be useful to see more detail on how private sector support and finance could be effectively translated into concrete, scalable and long-term benefits for IPLCs in sustainable value chains.

✓ **United States Comments**

- Papua New Guinea, Solomon Islands, and Vanuatu: The linkage with Papua New Guinea government or partners is not clear at the topline level.

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

4. Regional (El Salvador, Guatemala, Honduras, Mexico, Nicaragua, Panama). *Mesoamerica Critical Forest Biome Integrated Program* (GEFID: 11273). Agencies: FAO, IUCN; GEF Project Financing: \$58,147,493; Co-financing: \$438,166,265.

✓ **Canada Comments**

Biodiversity

- Mesoamerica has more than 20,000 species of vascular plants, bird species, reptiles, fishes, and reptiles, of which more than 3650 are endemic. Thousands of these are also threatened or endangered. The region also hosts many of the billions of North American migratory birds fly through Mesoamerica or stop for the winter. However, Mesoamerica is often neglected for financing given the attention to the Amazon. A strong recognition of the importance of the Mesoamerican region as a biodiversity hotspot should be acknowledged, and followed by adequate levels of financing when opportunities present themselves such as in this case.

Climate

- It should also be noted the Mesoamerica region is one of the most vulnerable areas in the world to climate, with hurricanes and huge losses occurring every year. Climate change also has an impact on the forests of the region, as populations from the highly affected dry corridor of Central America move towards forested areas and expanding the agricultural frontier, thus contributing to deforestation. Support to the project will help address the multiple issues affecting forests, as well as, socio-economic issues such migration to the North from Central American countries, as people will have better livelihood alternatives in their own countries.

Indigenous Peoples

- Experience in the region shows that indigenous and local peoples have to be part and parcel of the project planning. The proposed project should have an engagement/consultation strategy with local and indigenous peoples in order to be able to implement it. Development of the strategy should include input from Indigenous peoples.

Other

- Finally, in accordance with GOAL A of the GBF *“The integrity, connectivity and resilience of all ecosystems are maintained, enhanced, or restored, substantially increasing the area of natural ecosystems by 2050”*, and target 2 of the GBF: *“Ensure that by 2030 at least 30 per cent of areas of degraded terrestrial, inland water, and coastal and marine ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services, **ecological integrity and connectivity**”*, and TARGET 12, *“Significantly increase the area and quality and **connectivity**”* the project should include Costa Rica. Approximately two thirds of *Parque Nacional la Amistad*, one of the areas targeted by the project, lies within Costa Rica. This gives ample reason for the country’s inclusion in the project.

Deforestation/Small-Scale Farming/Soil (MSF):

- Recommend including a new indicator that shows the net impact of the Programs in halting and reversing ecosystem loss, in particular deforestation, in particular for the Amazon, Congo, and Critical Forest Biome Integrated Program and the Net-Zero Nature-Positive Accelerator Program.
- The current core indicators can show only the positive impacts of the Programs (e.g. CI3, CI4, CI5 ad CI6) but fail to consider any negative change such as deforestation leakage (I.e. improved protection/conservation in one area leading to more deforestation in other or new areas), which may be directly or indirectly related to policy reforms, a whole-of-government strategy, integrated approaches or others that the GEF Programs try to achieve.
- GEF should consider including a new core indicator for the two Programs, or at least a project level-indicator for the projects that aim to halt and reverse deforestation:
 - a net change in forest area (considering both forest gain and loss) in the target landscapes, or
 - a change in area affected by deforestation in the target landscapes

Supporting smallholder farmers through the Amazon, Congo, and Critical Forest Biome Integrated Program (CFB IP):

- We want to underscore that supporting smallholder farmers is critical for halting deforestation and inclusive transition toward deforestation-free supply chains. And, this Program must ensure that smallholder farmers in deforestation-risk commodity chains receive as much attention as other local community groups receive through this IP. In particular for the private sector engagement, we recommend the projects under this IP reinforce technical, financial and legal support for smallholder farmers within deforestation-risk commodity chains in order to help them adopt innovative, low-cost biodiversity-friendly practices and secure their legal rights (ToC 3).

✓ **Germany Comments**

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

Germany welcomes this proposal, which will contribute to the conservation and restoration of forest landscapes in six countries in Mesoamerica. At the same time, Germany has the following comments that it suggests being addressed in the next phase of finalizing the program proposal.

Suggestions for improvements to be made during the drafting of the final program proposal:

- The goals are highly aggregated, and some remain rather abstract. Therefore, Germany recommends that all indicators include concrete measurement criteria (e.g., which parameters will determine whether land is “under restoration” in component 3).
- Germany highly appreciates that the program proposal sets very ambitious goals for forest conservation and restoration in a highly complex and conflictive political environment. However, we feel that the threat of mining and land speculation for protected areas as well as the complex and conflictive political environment need to be stronger considered in the analysis. The proposal needs to include how political decision-makers will be encouraged and empowered to assume the responsibility for law enforcement regarding environmental and human rights legislation (in particular regarding protected areas and IPLCs).
- We also appreciate that the proposal refers to the Team Europe Initiative "Five Great Forests of Mesoamerica". In addition, we encourage to coordinate with the [REDD Landscape III Program](#), funded by Germany, which operates under the umbrella of the aforementioned initiative.
- Supply chains and voluntary commitments by the private sector are only briefly mentioned. Germany suggests including the promotion of regulatory conditions for transparency and traceability along strategic supply chains (in particular against the background of the evolving EU legislation on deforestation-free supply chains).
- Lastly, Germany welcomes that indigenous peoples and local communities (IPLC) are recognized as important allies for forest conservation in Mesoamerica. However, the following IPLC-related aspects need to be considered in the solution strategies: IPLC territorial governance structures, threats of forced displacement, land grabbing as well as infiltration by organized crime and political actors.

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

5. **Regional (Guinea, Liberia, Sierra Leone). *Guinean Forests (GEF-8 Amazon, Congo and Critical Forest Biomes Integrated Program)*. (GEFID: 11142) Agencies: FAO, CI, IUCN. GEF Project Financing: \$20,077,828. Co-financing: \$59,664,406.**

✓ **Canada Comments**

Deforestation/Small-Scale Farming/Soil (MSF):

- Recommend including a new indicator that shows the net impact of the Programs in halting and reversing ecosystem loss, in particular deforestation, in particular for the Amazon, Congo, and Critical Forest Biome Integrated Program and the Net-Zero Nature-Positive Accelerator Program.
- The current core indicators can show only the positive impacts of the Programs (e.g. CI3, CI4, CI5 ad CI6) but fail to consider any negative change such as deforestation leakage (i.e. improved protection/conservation in one area leading to more deforestation in other or new areas), which may be directly or indirectly related to policy reforms, a whole-of-government strategy, integrated approaches or others that the GEF Programs try to achieve.
- GEF should consider including a new core indicator for the two Programs, or at least a project level-indicator for the projects that aim to halt and reverse deforestation:
 - a net change in forest area (considering both forest gain and loss) in the target landscapes, or
 - a change in area affected by deforestation in the target landscapes

Supporting smallholder farmers through the Amazon, Congo, and Critical Forest Biome Integrated Program (CFB IP):

- We want to underscore that supporting smallholder farmers is critical for halting deforestation and inclusive transition toward deforestation-free supply chains. And, this Program must ensure that smallholder farmers in deforestation-risk commodity chains receive as much attention as other local community groups receive through this IP. In particular for the private sector engagement, we recommend the projects under this IP reinforce technical, financial and legal support for smallholder farmers within deforestation-risk commodity chains in order to help them adopt innovative, low-cost biodiversity-friendly practices and secure their legal rights (ToC 3).

✓ **Germany Comments**

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

Germany welcomes this proposal, as it focusses on an important forest area, which does not always get the attention it deserves. At the same time, Germany has the following comments that it suggests being addressed in the next phase of finalizing the program proposal:

Suggestions for improvements to be made during the drafting of the final program proposal:

- Germany appreciates that the program is working on forest governance, having different approaches for forests inside and outside of protected areas while working on improved livelihoods for the local population.
- Germany suggests reconsidering if there are parts of the program that can be downsized without compromising the targeted positive effects on forests and livelihoods in order to match ambition and the potential impact.
- Furthermore, the success of the program relies on underfunded governmental forest and protected area management agencies. Therefore, more emphasis should be put on capacity building and investments to enhance the infrastructure and equipment of those agencies.
- The European Union's PAPF and Germany's TGS program seem to have similar objectives. Germany suggests coordinating intensively with those programs.

✓ **Switzerland Comments**

The IP remains relevant, has a high potential to generate GEB, to be scaled up and replicated, contribute to sustainable development, the theory of change is comprehensible and plausible, The levels co-financing seems adequate. It is coherent and in compliance with GEF safeguards.

However, regarding the institutional set up we suggest to make the link to the Forest Steward Council (FSC).

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

6. Global (Angola, Brazil, Cambodia, Chad, Congo DR, Cote d'Ivoire, Haiti, Madagascar, Mali, Mauritania, Mexico, Mozambique, Nepal, Peru, Rwanda, Sao Tome and Principe, Sierra Leone, South Africa, Uzbekistan, Viet Nam). *Ecosystem Restoration*. (GEFID: 11118) Agency: UNDP, CI, IFAD, UNEP, World Bank, FAO, IUCN. GEF Project Financing: \$183,859,244. Co-financing: \$1,627,501,995.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at

least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Canada Comments**

- We have two recommendations for projects to be implemented in the Democratic Republic of Congo:
 1. Include the aspect of using the endogenous knowledge of local communities and indigenous peoples in addition to the benefits derived from genetic manipulation.
 2. Build capacity and equip stakeholders. To date, the DRC's efforts to achieve the "30x30" objective have reached 15.08% through protected areas, community forestry and APACs.
- To this end, we suggest consulting the facts and recommendations raised by participants at the latest "National Dialogue to capitalize on other effective conservation measures by area and recognize the role of local communities in the Democratic Republic of Congo, Kinshasa, May 09-11, 2023" organized by the International Union for Conservation of Nature, IUCN, in collaboration with the GIZ Biodiversity and Sustainable Forest Management Program.

✓ **Germany Comments**

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

Germany welcomes the proposal for the integrated programme, which will contribute to strengthening global ecosystem restoration efforts. Nevertheless, Germany has the following comments and suggests these be addressed in the next phase of finalizing the programme proposal.

Suggestions for improvements to be made during the drafting of the final program proposal:

- The full proposal should include the analysis of and cooperation with relevant ongoing and planned projects at national level by organizations other than participating implementing agencies as a guiding criterion for the conceptualization and implementation of child projects to seek synergies in implementation.
- Throughout the proposal, innovation features as a prominent element but is not defined. It is understood that the term innovation may refer to the development and application of new methods and approaches, technology, financial instruments, removal of policy barriers, new business models, and institutional reforms. However, it is important to explicitly define this concept and Germany suggests including a reference

to the fact that innovations are not exclusively constituted by actions that are entirely new or untested.

- With respect to the use of “knowledge products” as key component in several indicators, Germany suggests a stronger focus on the actual use of said products to move from output to outcome measurement. This could be realized by focusing on “use of” instead of “benefit of” in indicators 2.1.1 and 4.3.2 or better defining what signifies a tangible “benefit” in this instance. Likewise, for indicators 3.1.3 and 4.3.5 measuring the amount of organizations actually using tools and knowledge products created in the context of the IP would be more meaningful than counting the number of tools and products created.

✓ **Japan Comments**

- On projects related to supply chain of tropical timbers, we hope that the implementing agencies can leverage lessons learnt from comparable projects conducted by the International Tropical Timber Organization, which is a focal agency for supply chain management under Collaborative Partnership on Forests (CPF). Since ITTO is providing relevant data for FAO, utilizing its expertise would be beneficial for the multi-stakeholder dialogue as part of knowledge management and learning, while eliminating duplication of effort.

✓ **Switzerland Comments**

The IP remains highly relevant.

However, the wide geographic spread and diversity of countries involved is likely to require considerable effort and resources for coordination: **Thus, we have no question but encourage**

- to keep the program management light,
- to maintain multi-stakeholder engagement and ensure strong national ownership
- to use similar monitoring and reporting approaches in all participating countries in order to keep the collective effort visible and to facilitate the exchange of experience.

✓ **United Kingdom Comments**

- Can it ensure it links in closely to other national platforms/programmes (e.g REDD+, GCF programmes etc)?

✓ **United States Comments**

- Madagascar: Given the corruption present in the government, funding going to the Madagascar government should be tracked closely, including to ensure that benchmarks are met. Funding for reforestation needs to explicitly state Forest Restoration with Native Trees and the focus need to be on growing forests, not planting trees. If the model is based on funding via carbon credits, this is controlled by the government in Madagascar and due to corruption is of concern to potential investors. Comoros government has a very small staff and capacity but are willing partners.

- Uzbekistan: The Ministry of Natural Resources recently rebranded itself as the Ministry of Ecology, Environmental Protection and Climate Change.

7. Global (Belize, Cabo Verde, Comoros, Cuba, Maldives, Mauritius, Micronesia, Palau, Papua New Guinea, Samoa, Seychelles, St. Lucia, Timor Leste, Trinidad and Tobago, Vanuatu). *Blue and Green Island Integrated Programme*. (GEFID: 11250). Agencies: FAO, WWF-US, IUCN, UNDP, World Bank, UNEP. GEF Project Financing: \$121,183,945; Co-financing: \$733,790,102.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

Germany welcomes the PFD for the Blue and Green Island Integrated Program under GEF-8, which aims to facilitate nature-positive development and reduce ecosystem degradation in 15 Small Island Developing States representing the three SIDS regions, with specific application for the food, tourism, and urban sectors. The focus of the IP is to help transform these three key economic sectors towards sustainable, resilient, and nature-positive outcomes.

Suggestions for improvements to be made during the drafting of the final program proposal:

- The PFD states that gender equality and women’s empowerment results will be critical to the success and sustainability of the BGI IP; however, it is not clear why that is, i.e., what are the gender-related issues and challenges, and how would boosting gender equality and women’s empowerment help the IP achieve its aim?
- The ToC states several assumptions that would need to be fulfilled in order to achieve the IP objective (e.g., the need for buy-in by key stakeholders to change the status quo). However, even with “buy-in”, the timing would also need to be right to integrate the value of nature into coherent nature-positive policy and planning reforms (Component 1), as such strategic national planning and development processes typically run on 4–5-year timeframes, e.g. national development plans or sectoral development plans and road maps. It would be helpful to know how the “governance and policy transformational lever” will be used in countries where the opportunity may not exist to revise the current policy and fiscal planning landscape in the medium-term.
- In the ToC (Figure 4), under Systemic and Longer Term Impacts, the Systems Transformations include “Scaled-up nature-positive solutions in the urban and tourism

sectors...” In this case, should it be “Scaled-out solutions” per the scaling description provided in paragraph 47?

- A lesson learned about access to climate finance for SIDS and LDCs has been that SIDS typically have only 1-2 people within government that are tasked with a myriad of responsibilities, including developing project ideas and seeking access to climate finance. How does the IP ease that burden on human resources? Will advisors be embedded in key institutions?
- The child project selection criteria are included twice (para 181).

✓ **Switzerland Comments**

- p. 66, 67 paragraphs. 153, 154: Aligned activities for financing mechanisms and NbS. It is not clear how the Program will interact with and complement these activities. **Could you expand?**
- Program proposes activities that are already partially undertaken by other actors in certain SIDS (develop insurance mechanisms, other donor funded accelerators). **How will the Global Technical Facility collaborate with the existing actors (p.51 and p. 61 GCP Programme Structure)?**
- P. 31: Programme will identify and build partnerships with private sector partners able to provide catalytic and investment capital at scale to accelerate the adoption of proven NbS and scale up area-based protection and management of vital ecosystems. The Selection process for engaging the private sector actors is not well defined. **Could you please specify?**
- p. 64; SIDS NbS accelerator: The emphasis will be on convening relevant actors on providing innovation-driven technical assistance to local project developers (such as MSMEs) to structure bankable NbS projects across the target sectors of the IP. **What will be the selection process for MSMEs and ensuring equal access? Who will define the beneficiary selection process?**
- The program focuses on valuation of ecosystem services. It does not touch on payments for ecosystem services, who will provide them, what will be the programs stance on carbon credits and biodiversity credits. **As adaptation benefits will not be measured, payments for adaptation outcomes seem not to play a role in financing structures, why, could you explain?**
- P. 71, 72: The results indicators presented seem weak; while reference is made to broader GBF targets no program targets are provided for the respective indicators. **At what stage will the targets be defined, by whom?** Some indicators are quite broad and given that other actors are already working on some initiatives in SIDS, the attribution of the GEF funding to achieve the outcomes might not always be clearly made (e.g., indicators outcome 2.3. p. 72).

✓ **United Kingdom Comments**

- More emphasis could be placed on ensuring the programme includes not only the economic benefits of ecosystem protection and restoration in itself (e.g. benefits to tourism and other natura resource based industries), but also equally the climate-

resilience and adaptive capacity benefits of the ecosystem services and how to value those (e.g. storm/flood protection/reduction of intensity and therefore reducing potential total damages of a weather event).

- Country selection; interesting to see a couple of non-ODA, eg. Sechelles. There's a couple of unusual countries (Cuba, Timor-Leste will be interesting to see how they work as part of the cohort. Great to see Belize, Cabo Verde, Seychelles, and Samoa in there as they are the co-Chairs of the SIDS Coalition for Nature and will be key in using that forum to pursue south-south (or SIDS-SIDS) learning, which is a key aim of the Coalition and is mentioned in this proposal. Many of the SIDS in this group are part of the Coalition.
- It will be good to see how this project and the FAO-delivered SCCF project proposed in Cabo Verde can be complementary.

✓ **United States Comments**

- Cabo Verde: This project is highly relevant to Cabo Verde's needs and align with our Integrated Country Strategy mission goal #3, which focuses on strengthening Cabo Verde's resilience to environmental vulnerability and the impacts of climate change, while promoting inclusive development. Therefore, we recommend supporting this project. Implementing environmental solutions can enhance Cabo Verde's resilience to climate change impacts. This initiative has the potential to improve the well-being and socio-economic conditions of local communities, while safeguarding the country's unique natural resources.
- Papua New Guinea, Solomon Islands, and Vanuatu: Global programs with wide ranges of partners can have their impacts severely diluted in the Pacific. One of the major proponents is the UNDP office here in the FSM. It is a well-run and managed office, and many of our IPs collaborate with them on a regular basis. USAID's Climate Ready worked with our local UNDP office as well in preparing many of their proposals. That strengthens the quality of their proposals. We certainly are in favor of the funds they are requesting, and we predict that the programs will be successful. We're very excited about CCBO's work and proposed CRS grant here for plastics. Everyone we talk to wants to get involved. Plastics are everywhere, and solid waste management is an obvious problem.

8. Global (Chile, Costa Rica, Cote d'Ivoire, Indonesia, Mauritius, Mexico, Morocco, Nigeria, Tanzania, Thailand, Trinidad and Tobago, Viet Nam). *Net-Zero Nature-Positive Accelerator Integrated Programme*. (GEFID: 11085). Agencies: UNIDO, ADB, UNDP, UNEP, CAF, FAO. GEF Project Financing: \$98,678,187. Co-financing: \$695,182,970.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note

them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Canada Comments**

Deforestation/Small-Scale Farming/Soil (MSF):

- Recommend including a new indicator that shows the net impact of the Programs in halting and reversing ecosystem loss, in particular deforestation, in particular for the Amazon, Congo, and Critical Forest Biome Integrated Program and the Net-Zero Nature-Positive Accelerator Program.
- The current core indicators can show only the positive impacts of the Programs (e.g. CI3, CI4, CI5 ad CI6) but fail to consider any negative change such as deforestation leakage (i.e. improved protection/conservation in one area leading to more deforestation in other or new areas), which may be directly or indirectly related to policy reforms, a whole-of-government strategy, integrated approaches or others that the GEF Programs try to achieve.
- GEF should consider including a new core indicator for the two Programs, or at least a project level-indicator for the projects that aim to halt and reverse deforestation:
 - a net change in forest area (considering both forest gain and loss) in the target landscapes, or
 - a change in area affected by deforestation in the target landscapes

✓ **Germany Comments**

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

Germany welcomes this proposal, which seeks to foster integrated solutions to the climate and biodiversity crises in twelve partner countries. At the same time, Germany has the following comments that it requests being addressed in the next phase of finalizing the project proposal.

Suggestions for improvements to be made during the drafting of the final program proposal:

- Germany welcomes the high amount of co-financing generated from a great variety of sources, both public and private. However, we would like to better understand which firewalls and safeguards are in place to prevent influence and greenwashing of fossil fuel companies providing co-financing for the Integrated Programme, including Shell, BP, and the Nigerian National Petroleum Company. What measures are taken in terms of avoiding reputational risks for the GEF?
- Germany also appreciates the ambitious targets regarding the coherence of policies as well as public finances. Since both topics are highly complex and country-specific, we recommend that specific and realistic targets are formulated in each of the partner

countries. Furthermore, for the implementation of these targets, it is essential that the program contributes to building alliances for political buy-in on this behalf.

- The IP's Monitoring and Evaluation scheme plans for an independent Terminal Evaluation undertaken by UNEP Evaluation Office. We urge UNEP strongly to ensure a truly independent and impartial evaluation by an external stakeholder.
- Germany recognises the need for increased Multilateral Development Bank (MDB) coordination and recommends making use of existing formats such as the MDB Paris Alignment Working Group. Furthermore, there are many related ongoing initiatives of the respective public counterparts and other donors (beyond MDBs). It is essential that the program aligns and coordinates thoroughly with these initiatives.
- Regarding the downstream investments promoted in component 2, it needs to be ensured that relevant actors at local scale (incl. IPLCs) participate adequately in decision-making.
- Germany would welcome a more detailed indication on how the GHG emission reductions are calculated.
- Germany emphasises that political risks, including government change, should not be underestimated and suitable containment strategies should be put in place, such as intensified cooperation with national and local civil society stakeholders.

✓ **Switzerland Comments**

The relevance and the potential positive climate and nature/biodiversity impact of the IP remain very high. However, there are some potential risks that should be addressed in the development of the child project:

- The knowledge products of the IP (and the child projects) should be shared and made accessible with as many stakeholders as possible including youth and women
- The expected deliverables/output such as policy tools, guidelines, roadmaps, pathways, workshops, webinars, training, feasibility studies, pilots and peer learning – these are good to have, but can be overwhelming and used little in the end. Thus, it is important to produce fewer, selected, targeted and tailor-made deliverables/outputs tends to be more impactful and sustainable
- To coordinate all the different stakeholders, source of (co)financing etc of the IP and child projects in an efficient and effective way will be challenging. It will be important to use resources to this end judiciously, transparently and accountably.

✓ **United Kingdom Comments**

- Encourage projects to links as strongly as possible to the delivery of countries existing strategies and plans for sustainable development, nature and climate, and to be explicit about this.
- Aware of a lot of programmes now developing and implementing country plans for countries to meet the GBF targets – greatly encourage coordination between these to

ensure synergies between their delivery: especially the GEF funded NBSAP umbrella programmes, and the Biodiversity Finance Plan umbrella programme delivered with UNEP and UNDP and others like the NBSAP Accelerator.

- Recognise that the proposal is challenging, especially around long term policy coherence – would be good to see a long term evaluation and learning plan to build understanding of what works and impacts beyond the lifespan of the project.

9. Global (Brazil, Burkina Faso, Cambodia, Cook Islands, Costa Rica, Dominican Republic, India, Jordan, Lao PDR, Morocco, Nigeria, Peru, Philippines, Senegal, South Africa). *Circular Solutions to Plastic Pollution*. (GEFID: 11181) Agencies: WWF-US, UNIDO, UNEP, UNDP. GEF Project Financing: \$96,280,581. Co-financing: \$595,778,545.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

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

- Germany would like to emphasize strong relations to the International Negotiation Committee to develop an international legally binding instrument on plastic pollution, including in the marine environment, to work under the Basel, Rotterdam and Stockholm conventions as well as existing trade measures coordinated under the World Trade Organisation dialogue on plastic pollution and environmentally sustainable plastics trade. The final proposal shall identify how the suggested programme is harmonized and aligned with the above-mentioned international processes.
- Germany welcomes the planned engagement of vulnerable groups and would like to emphasize the need to follow an inclusive approach taking into account the needs of marginalized groups and consider traditional knowledge. The full proposal shall lay out how a just transition approach will be implemented.
- The full proposal shall further clearly identify how packaging and plastic innovation are leveraged among actors, such as fast-moving consumer good companies, brand owners and related packaging producers. Particularly, the concept shall elaborate how standards, guidelines and business models that are either subject to national or sector

constraints, or individual companies will contribute to development and implementation at a global scale.

- Waste hierarchy and potential lock-in effects should be reflected for interventions/measures. For these clear definitions are needed in the final proposal, in 3 d) when referring to reuse (as the highest option in the waste hierarchy apart from prevention), chemical recycling is mentioned which is clearly no reuse, but end-of life treatment probably only little more favourable than incineration, if at all.
- Germany further asks that 3 d), 4 d) and 5 should explore the multi-country approach of this project for greater universal applicability in the final proposal.
- The full proposal should moreover identify how the infrastructure requirements to existing food and beverage production facilities as well commonly required infrastructure for reuse and recycling systems will be reflected and addressed.

✓ **Switzerland Comments**

The integrated program, Circular Solutions to Plastic Pollution is well designed, is focusing on single use plastic in the food and beverage industry and has a coherent and clear theory of change. It has a critical number of countries participating and involves all relevant stakeholders, specially also the private sector. It builds on the achievements and results of several on- going projects with a similar goal and it benefits from the experiences of other implementing agencies.

We have no comments and questions.

✓ **United Kingdom Comments**

High-level comments

- If the GEF is to be the of funding mechanism for the treaty, how can the GEF ensure there will not be potential dilution of funds for plastics work alongside other climate and chemicals priorities for GEF? How will the GEF build in the capacity to operate as the main funding mechanism for the plastic pollution treaty?
- What work will the GEF undertake to engage with the private sector to enhance private sector funding and support via GEF?

Technical

The GEF and the new treaty on plastic pollution:

1. *Developing countries are calling for a dedicated multilateral fund for the new treaty, citing concerns about access to finance through the GEF, particularly SIDS and developing countries in East and West Africa, how can the GEF ensure it will demonstrate its ability to deliver in relation to this?*
2. *Development finance to address plastic pollution has increased in recent years but is fragmented and concentrated in certain areas. A strategic approach is required to mobilise and align financial flows, creating an enabling environment to direct financial flows, from both public & private sources. There is a need for the GEF to demonstrate its ability to scale*

up and mobilise the significant funding that will be required in future, particularly from the private sector.

3. *To tackle plastic pollution, a comprehensive approach that addresses the full lifecycle of plastics is needed. This includes elements such as circular design criteria and internationally harmonised design standards to foster reusability and recyclability of plastics, retaining the value and utility of products within the economy for as long as possible and minimising waste. However, mismanaged waste remains the number one source of plastic leakage to the environment. There is a need for the GEF to demonstrate its ability mobilise finance and de-risk investment to improve waste management capacity in developing countries.*

✓ **United States Comments**

- India: We find it promising that the Indian agency for this project is the Ministry of Micro, Medium and Small Enterprise, which processes most of the plastic in India. However, we suggest engaging with the Ministry of Environment, Forest and Climate Change (MOEFCC) and the Pollution Control Boards as one of the interventions is Enabling a Regulatory and Policy Environment which fall in the ambit of the MOEFCC.

10. Global (Cambodia, Cambodia, Costa Rica, Costa Rica, Ecuador, Ecuador, India, India, Mongolia, Mongolia, Pakistan, Pakistan, Peru, Peru, Trinidad and Tobago, Trinidad and Tobago). *Eliminating hazardous chemicals from supply chains.* (GEFID: 11169). Agencies: FAO, UNEP, UNDP, UNIDO. GEF Project Financing: \$45,674,998. Co-financing: \$295,245,000.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

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

- Germany appreciates the foreseen transparency of material contents and awareness raising for workers on the health risks of the chemicals and products they work with.
- Introducing more sustainable materials and processes is regarded as very challenging in both supply chains. The final proposal shall explain which activities can be targeted in an integrated manner and how actors in both sectors might learn from each other.

- The PFD states that the empowerment and inclusion of vulnerable groups will be prioritised and further specifies individual cooperation partners. The final proposal shall outline relevant factors and concrete objectives for successfully empowering women and indigenous groups throughout the project.
- Germany appreciates the planned establishment of a shared knowledge repository. The final proposal shall include a strategy for covering diverse local contexts and solutions, also considering knowledge by local and national governments as well as development agencies and NGOs beyond the UN system.
- Component 4 – behaviour change: The proposal explains that consumers for global textile supply chains are predominantly high-consumption markets largely in the Global North. We request a more detailed clarification on i) which the mechanisms deploying international consumer markets are, and ii) how the selected transformation levers may influence these consumer markets (refer as well to recent market trends such as the European due diligence act as well as the upcoming Carbon Border Adjustment Mechanism).
- Component 5 – reverse logistic: Post-consumer and post-production waste are either mixed up or used as synonyms. Clearly differentiate these two strategies and review, if post-consumer waste is correctly placed under component 5 or rather should be moved under component 3.

✓ **Japan Comments**

- As the PDF document seems like not complete yet, updating the document is required as soon as possible. Thus the below comments are preliminary.
- Country selection: While the construction industries exist in any country, textile industries are concentrated in certain countries. Justifications are not adequately provided in terms of country selection on textile supply chains.
- Structure: While some private investments are envisaged, they are very vague, and all project components are technical assistance. Justifications are not adequately provided to achieve the project objective.
- Components: Although 9Rs are mentioned, more enhanced resource efficiency and circularity along with value chains should be highlighted more from design to recycling, to reduce pollution, GHG emissions, and biodiversity loss.
- GEBs: Given that the project structure is based on TA, the expected GEBs (direct) seem very ambitious. Better to explain the rationale more clearly that this program can achieve such outcomes.

✓ **Switzerland Comments**

The theory of change, it is not understandable or logic how the program components are contributing to the goal of the program and how they are linked with each other. Activities

planned are missing. Indicators and the predicted amount of savings are not really justified and plausible and the stakeholder analysis is missing/weak. **Could you provide more information?**

✓ **United Kingdom Comments**

- While it is valuable to reference the triple planetary crises of climate change, pollution and biodiversity loss in reference to the IP on “Eliminating Hazardous Chemicals from Supply Chains”, it is also helpful to underscore these interlinkages throughout the other Integrated Programmes (and indeed, focal areas). Adding a short line to that effect in the introduction to the work programme, or under the section on the IPs (paras 38 – 39) could be helpful in this regard.

✓ **United States Comments**

- India: We believe the Ministry of Chemicals and Fertilizers should be incorporated into this proposal.

OTHER PROGRAMS

11. Global. *Global Programme to Support Countries to Upscale Integrated Electric Mobility Systems*. (GEF ID 11074). Agencies: UNEP, ADB, World Bank, EBRD. GEF Project Financing: \$22,257,385. Co-financing: \$129,356,667.

✓ **Germany Comments**

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

Germany welcomes this proposal which aims to widen the set of low and middle-income countries shift to electric mobility, including the mitigation of negative side effects related to the end-of-life of used electric vehicles and their batteries. This is a comprehensive project with an important focus on investments in pilots, technical assistance, outreach, and awareness campaigns at the global, regional, and country levels.

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

- Germany recommends to emphasise how project activities can contribute to a just transition in the transport sector, with reference to green job creation, low-income groups, drivers and workers and women’s empowerment.
- Germany supports a high level of integration between project activities on e-buses, with the BMZ funded TUMI E-bus Mission. Germany recommends seeking regular exchanges on project activities for both normative and country-level work.
- Germany supports a high level of integration between project activities on informal transport electrification with BMZ bilateral portfolio. Germany recommends seeking regular exchanges on project activities for both normative and country-level work.

- Germany appreciates the dedicated focus on the introduction of electric bus-rapid (BRT) systems. Germany recommends close cooperation with bilateral country projects working on this topic (Kenya, Senegal).
- Germany appreciates the stronger focus on financing issues and recommends also a close exchange with bilateral and multilateral development banks working on the electrification of public transport.
- While Component 1 has clear project outputs, Germany asks that the overall outcome goes beyond 'national policy frameworks and established roadmaps' to include regional roadmaps. This will ensure greater applicability, success, and scalability.
- Germany appreciates the comprehensive list of stakeholders the projects aim to include. Germany would recommend a greater understanding/mapping of the growing industry, private sector and private financiers involved in the transformation and the role they will play in the project activities.

✓ **United States Comments**

- Papua New Guinea, Solomon Islands, and Vanuatu: Global programs with wide ranges of partners can have their impacts severely diluted in the Pacific. There are apparent opportunities for linkage to/need to coordinate with USTDA/DFC global programs.

STAND-ALONE FULL-SIZED PROJECTS

BIODIVERSITY

12. Venezuela. *Strengthening management to combat threats from Aquatic Invasive Alien Species in Venezuela* (GEF ID: 11115). Agency: FAO. GEF Project Financing: \$6,000,000. Co-financing: \$35,940,000.

✓ **Canada Comments**

- Request additional details on how it is intended to control the invasive coral, U. Stolonifera, how long it will take, how success would be defined, and what the likelihood is of achieving that success level. It's very difficult to completely control invasive species and to do so could take many, many years

✓ **Germany 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 transform and expand the current scope of the management of aquatic invasive alien species (IAS) in Venezuela. The aim is to develop a comprehensive system for the detection, control, and management of aquatic IAS. The involvement of women, local communities, academic environmental education programs and

planned inter-ministerial exchanges are strongly welcomed. However, Germany has the following comments that it suggests being addressed in the next phase of finalizing the project proposal:

Suggestions for improvements to be made during the drafting of the final project proposal:

- ✓ As noted by the Secretariat, the proposal gives the impression that the direct eradication of the invasive species is the focus of the project. That the actual focus is the management and control of aquatic IAS is clear from the title and becomes clearer as the proposal progresses but could be reformulated more prominently in the introduction.
 - ✓ The project aims to involve the local communities in the monitoring and control of IAS. It could be made clearer whether fishermen will also be trained on how to prevent the further spread of IAS through fishing activities. Fishermen should also be trained in the proper handling of *U. stolonifera* when cleaning their equipment to avoid possible health risks.
 - Diversification of possible sources of income is an important point. This could be further specified as it has been kept relatively vague so far but is of great importance as fishing as a livelihood is threatened by the spread of IAS.
 - According to Transparency International, there is no established local civil society environmental social watchdog in Venezuela.⁷ Germany appreciates the involvement of local communities in the development of a National System for detection, monitoring and control of aquatic IAS that is financially sustainable and especially the promotion of non-discriminatory participation of small-scale fishing communities, in transparent and accountable decision-making processes.
- ✓ **United Kingdom Comments**
- Project costs, including co-funding, are estimated to be over US\$42 million. Around 86% is expected to be contributed by State institutions as part of their recurrent expenditure or in-kind payments. However, given Venezuela's limited financial resources (which is noted elsewhere in the proposal), it is unclear to what extent these budget commitments would be specifically attached to the project. Further detail would therefore better inform how co-funding would be sourced and spent in support of project outcomes.
 - Unilateral coercive measures (UCMs) are particularly mentioned as a reason why the public budget for environmental action has decreased. Economic mismanagement, corruption and oil dependence have been among the major drivers of economic instability in Venezuela, which are not mentioned in the report. We would encourage these to be added to the reasons for the public budget decreasing.
 - Involvement of non-governmental organisations (NGOs), local communities and academic institutions within the proposed system to detect, control and manage IAS in Venezuela is welcome. Their role should be clearer in the PIF, as the focus so far has been on public sector institutions. It is also imperative for the judicial system, notably the Office of the Prosecutor General and the Office of the Attorney General, to be an

active player beyond being just a recipient of information given their role in the review and implementation of Venezuela’s legal framework (as noted in the risk entitled “Strategies and policies”) – especially for addressing cases of illegal introduction of IAS, such as the *U. stolonifera*.

- Lastly, the UK’s experience with FAOs ability to deliver has been focused on terrestrial ecosystems rather than aquatic ecosystems. Previous GEF-funded projects mentioned in the PIF targeting marine and coastal areas had been implemented by UNDP in Venezuela. it is important for FAO to link up with UNDP and other agencies with experience of delivering in this field.

13. Chile. *Strengthening inter-institutional coordination for the mainstreaming of biodiversity conservation in national, regional and local public policies in Chile* (GEF ID: 11208). Agency: FAO. GEF Project Financing: \$3,776,941. Co-financing: \$25,681,614.

✓ **Germany Comments**

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

Germany welcomes this proposal, which seeks to contribute to a more effective interinstitutional coordination and policy coherence for the protection and sustainable management of biodiversity in Chile, with a particular focus on conservation policies, instruments, and processes. At the same time Germany has the following comment with respect to the proposal and suggests it be addressed in the next phase of finalizing the project proposal.

Suggestions for improvements to be made during the drafting of the final project proposal:

- In Jan. 2023, the legislative project “Law for the Environment” passed the Chilean House of Representatives and transmitted to the Senate for further debate. Since the law, if and once approved, would create the Service for Biodiversity and Protected Areas (SBAP), institutionally unifying current procedures and mandates for biodiversity conservation, Germany suggests strengthening the explanation within the proposal on how the project would support the creation of such an institution and how it would ensure that the design of procedures, coordination mechanisms, management instruments and policies supported by the project will take into account the potential later establishment of said service, thereby assuring best possible adaptability and uptake of outputs by the new institution if it should be established.

14. Brazil. *Biodiversity Wildlife Territories* (GEF ID: 11268). Agency: FUNBIO. GEF Project Financing: \$16,872,477. Co-financing: \$51,000,000.

✓ **Germany Comments**

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

Germany welcomes this proposal but would request the following adjustments.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany considers the inclusion of indigenous peoples and local communities and the improvement of their livelihoods a crucial factor in the implementation of conservation projects. For component 2.3., Germany would like to suggest that further details on the measures planned are provided since some of the described activities are not clear. For example, further details would be welcomed on the 'ordering' of sustainable use of natural resources from local management (what is being ordered and how?) and the 'conservation agreements and plans to be built locally' (agreements between which parties and who will follow up on these?). In addition, further details on 'enable infrastructure, logistics and value-adding solutions' would be appreciated.
- Regarding the regional focus, it is not clear whether the project region includes coastal and marine areas. However, marine areas are not mentioned or listed as one of the 5 non-Amazon biomes considered in the proposal. The only time marine areas are mentioned are under indicator 2.1, suggesting that the project aims to create 960.000 ha of Marine Protected Areas (MPAs). We therefore assume that marine areas are considered under Outcome 2.1. We recommend that marine areas should also be considered under Outcomes 2.2, 2.3 and 1.1. If coastal and marine areas are not included in the proposal, it would be important to clarify this and explain why.
- We recommend that the project develops a strategy for monitoring and maintaining the supported restoration efforts in the medium and long term (beyond project implementation).
- All outcomes of Component 2 seem to focus on ICMBio and federal protected areas. However, state and municipal protected areas cover more than 30% of all protected areas in Brazil and are managed by state or local environmental agencies. Many state and municipal protected areas still lack behind federal protected areas in terms of capacities, implementation of monitoring protocols (such as the Monitora Program), and other protected area management practices. It would be relevant to include them as partners and/or beneficiaries in the implementation of this component.
- Regarding component 3.1., Germany would like to suggest including further details on the project's concrete contribution to strengthening public policies. What exact activities are going to take place? In addition, we would welcome further information on the responsible entity for component 3. Will it be implemented by Funbio or the executing entity to be chosen?
- At the national level, the proposal identifies relevant projects for cooperation. At the subnational level, there are many more relevant projects or initiatives. For example, other relevant initiatives are Pacto pela Restauração da Mata Atlântica (for the restoration of the Atlantic Rainforest), and the Critical Ecosystem Partnership Fund (CEPF) for conservation and sustainable use of the Cerrado.
- While the proposal mentions involving local communities and community-based organizations in restoration (outcome 1.4), in the sustainable use of biodiversity (outcome 2.3), and in biodiversity monitoring (outcome 2.4), there are little concrete

provisions beyond that. Germany suggests including more concrete measures for local ownership during the PPG phase.

15. Brazil. *Empowering Indigenous Peoples and Local Communities (IPLCs) to manage biodiversity data and information as a strategy to conserve their territories, safeguard traditional knowledge, and promote integrated biodiversity management* (GEF ID: 11269). Agency: UNEP. GEF Project Financing: \$6,192,695. Co-financing: \$49,450,000.

✓ **Germany Comments**

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

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

- Germany considers the inclusion of IPLCs and the promotion of their rights a crucial factor in the implementation of conservation projects. The project proposal aims to produce and manage biodiversity data and information as a strategy to effectively protect IPLC territories, safeguard traditional knowledge, and promote integrated biodiversity management. However, the project does not make sufficiently clear how the envisaged activities contribute to achieving these goals. In particular, the proposal lacks information on conservation outcomes to be achieved. Further, a missing element in the intervention logic and theory of change relates to the efficient and safe use of data in SiBBr: To mobilize and engage indigenous populations from the planning process onwards, capacity development only will not be sufficient. It is fundamental to explain to potential indigenous project partners how the contributed data in SiBBr will turn into concrete action in IPLC territories since historically indigenous peoples and their organisations have shown little confidence in governmental policies.
- Moreover, the information on how the data could have concrete outcomes in IPCL territories is too vague (Outcome 2.2).
- The information on ABS and bioeconomy and the elements how to ensure FPIC are not convincing: The existing ABS structure and laws in Brazil according to indigenous organizations are weak, not representative and do not ensure FPIC. Further, bioeconomy and access to markets is very complex and needs structured, formalized and experienced indigenous organisations.
- Germany therefore requests that the proposal is amended to include information on
 - conservation outcomes to be achieved through data collection and monitoring; what is the link and how is the information gathered used for conservation purposes; how are concrete action in IPLC territories achieved through data collection and contribution to SiBBr;
 - establishment of stronger ABS mechanisms and bioeconomies;

- ensuring confidence and safeguards in case that data from system SiBBR is misused, e.g., via a complaint system in the form of prosecutors or ombuds institutions which could be linked to SiBBR (MPF, DPU, etc.).
- The proposal states that there is mostly a strong indication of the sustainable use of natural resources by indigenous peoples. Given that, please specify the exact need for this project from IPLCs point of view, especially with regard to data collection and setting up Environmental and Territorial Management Plans or other Management Plans.
- The proposal focuses on indigenous peoples and lacks information in engaging local communities: The following institutions should be involved actively in the project as partners to ensure equal representation of indigenous peoples and local communities:
 - CNPCT – Council on national level, with equal representation of traditional peoples and communities and Government, coordinated by MMA+
 - ICMBio – Governance institution, important for governance and monitoring of RESEX, where many Local Communities have their territories etc.
 - CONAQ, CNS, CAA do Norte de Minas, Movimento Quebradeiras de Coco Babacu MQCB
 - Steering Council National Policy for Environmental and territorial Management of Indigenous Territories (PNGATI, regional committees of PNGATI, Indigenous environmental agents (Agentes ambientais e territoriais Indígenas, agentes socioambientais indígenas etc.)
 - Conselho Nacional de Política Indigenista (CNPI)
 - Indigenous Women’s Organization ANMIGA,
 - Coordination of Indigenous Organizations of the Brazilian Amazon COIAB (Gerencia de Monitoramento dos Territórios Indígenas, GEMTI)
 - Subnational Environmental ministries, (SEMAs dos Estados) and
 - Indigenous environmental agents (Agentes ambientais e territoriais Indígenas, agentes socioambientais indígenas etc.) in diferente indigenous organizations.

CLIMATE CHANGE

- 16. Chile. *Supporting the shift to a low-emission, circular construction in Chile.* (GEF ID: 11071). Agency: UNEP. GEF Project Financing: \$2,963,699. Co-financing: \$20,200,000.**

✓ **Germany Comments**

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

Germany welcomes the holistic approach of the project, which aims to decrease carbon emissions from buildings and the construction sector in Chile.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany asks to check whether the issue of corruption can be more strongly. Worldwide, corruption, illegal mining/extraction or sale of materials or improper disposal to avoid recycling or disposal costs are common hurdles and stand in the way of the success of such a project. These issues are only briefly mentioned in the proposal. A deeper examination of these would strengthen the successful implementation of the project.

17. Brazil. *Promoting zero-emission buildings in Brazil through climate technologies and policies (EDinova)*. (GEF ID11072). Agency: UNEP. GEF Project Financing: \$9,167,443. Co-financing: \$66,657,355.

✓ **Germany Comments**

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

Germany welcomes the holistic approach of the project, which aims to promote the decarbonisation of the Brazilian building and construction sector. In particular, the holistic approach of reducing GHG emissions throughout the entire life is in line with Germanys approach.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany asks to check the funding sum of the Project Components '2. Demonstration of the feasibility of net-zero buildings' under *Component Balances* as there is a duplication and different sums are mentioned.
- Germany asks to strengthen the integration of regional/ local actors in the stakeholder analysis, as urban planners and building authorities, are the ones who ultimately

18. Argentina. *Accelerating low-emission and resilient community energy in Argentina*. (GEF ID: 11073). Agency: UNEP. GEF Project Financing: \$4,701,497. Co-financing: \$32,000,000.

✓ **Germany Comments**

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

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

- Low emissions community energy can only be realized in a cost-effective manner when looking at the supply as well as demand side. Therefore, Germany requests that the demand side, and in particular the potential for energy savings and efficiency improvements, be properly considered in project measures and outputs. Every kWh saved, is a kWh that does not need to be produced.

- In addition, Germany requests to pay special attention to the role of community energy to satisfy the increasing demand for heating & cooling. To ensure a sound holistic approach and drive the energy transition on the local level demand for electricity and heating & cooling shall be considered in an integrated fashion to ensure complementarity. According to Germany's experience, communal heating and cooling plans are an essential component to make the energy transition a success. These need to be complemented by a proper framework to stimulate the transition to renewable heating & cooling solutions.
- Germany suggests to also draw from the extensive German experience – successes and failures – with promoting the energy transition on local level and in communities when developing a conducive framework and concrete measures for Argentina.

19. China. Green hydrogen energy integrated demonstration application project in China (GEF ID: 11271). Agency: UNIDO. GEF project financing: \$16,000,000. Co-financing: \$160.9 million.

✓ **Canada Comments**

- With regards to green hydrogen, it would also be important to take into consideration the energy efficiency of green hydrogen production, recognizing that it is a typically inefficient process for generation usable energy when the renewable energy can be used directly with additional energy loss in most cases, including possibly for the transportation sector.

✓ **Germany 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 catalyze green hydrogen production and application in Ningdong, Dalian and Shenyang, China, with the aim to decarbonize and support the energy transition. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany appreciates the description of the outcomes. Nevertheless, a stronger focus should be placed on the sustainability of the entire process chain. In this context, especially in mobile applications of hydrogen, it should always be questioned whether more efficient solutions are available that could avoid the conversion step from green electricity to hydrogen.
- Regarding the production of green hydrogen, greater consideration should be given to the aspect of additionality in the production of the green electricity. If this aspect is neglected, there is a risk in an energy system still largely based on fossil power generation, as in China, that other consumers will be supplied with additionally generated fossil power and the positive climate effect of the application of green hydrogen will fizzle out.
- Outcome 2.1 focuses on green hydrogen technology in production, heavy transportation and hard-to-abate industry sector. While the measures in the transport sector are already

presented quite precisely, the explanations for applications in the industrial sector remain quite vague. It would be welcome if this could be fleshed out a little more.

✓ **Japan Comments**

- We recognize that the 1:7.5 overall co-financing metric cited may have been inflated by a few private-sector/corporate- related projects. Of the regular projects, we observe the very large co-financing ratios in industry-related projects in sectors such as power generation and construction, and suspect these may have contributed to this overall boost. We hope that these risks are taken into account in project designs, and recommend careful review to back check these figures assessed, which may also affect the value of the grants proposed.
- Furthermore, since some of these industry projects relate to the sectors (hydrogen in particular) that could be easily financed by risk-tolerant private capital, we may want to consider additionality issues much more carefully (for example, by prioritizing/ prompting re-allocation of capital in other themes/areas that can't have such easy access to markets for funding, even if it may have less co-financing ratios, or considering NGI path as an option).
- We should be leaving these initiatives to the handling of the private sector, to avoid unnecessary politicization and other reputation-related risks for the GEF. We therefore recommend projects with these characteristics to be subject to a second review by Council with more information before CEO endorsement.

CHEMICALS AND WASTE

20. Regional: Africa, Egypt, Ethiopia, Kenya, Nigeria, South Africa. *Fortifying Infrastructure for Responsible Extinguishments (FIRE)*. (GEF ID: 11110). Agency UNEP. GEF project financing: \$10,000,000. Co-financing: \$45,000,000.

✓ **United States Comments**

- Ethiopia: We would want to know if this project would be affected by the assistance pause. While the Government of Ethiopia and Ethiopia EPA would be receptive to this project, any cost increase would not gain any real traction due to forex issues.

21. Global: Sierra Leone, Tunisia, Türkiye, Uruguay. *Shifting to Zero Waste Against Pollution (SWAP) Initiative* (GEF ID: 11211). Agency UNDP. GEF project financing: \$26,700,000. Co-financing: \$216,691,545.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into

consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

Germany welcomes the objective to reduce chemical pollution in the value chain through activities at the municipal level. However, the final proposal should include more focus on the need to align municipal actions with activities at the national level, as the legislative mandate of cities might be limited.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany appreciates the best practices considered in output E.2 and the partnership strengthening including international treaties and platforms. These resources should be used to guide and streamline city activities in the project. In output A.2, cities should make use of these.
- The project rationale and output A.4 should clarify in more detail how the project deals with healthcare/medical waste. Medical waste has to be burned in special ovens as it is classified as hazardous waste, which requires specific infrastructure and is not defined as circular.
- Waste to energy is not considered a sustainable solution, as implied in the project rationale (p. 13). The final proposal should specify or modify this classification.
- The barrier analysis in the project rationale should also include the occasional lack of knowledge on the potential of circular economy and appropriate business models as well as a missing perspective on waste as a resource
- Output A.1 should support cities in identifying and if applicable aligning indicators and data collection mechanisms through standard indicators, including from best practices and international standards.
- Output C.2 should consider the limited influence of cities on standardized value chains, such as the manufacturing of electronics. Also, it should address the fact that a large share of products is imported from other countries (e.g. textiles).

✓ **United States Comments**

- We support this as it can improve waste management.

22. Paraguay. *Global Opportunities for the Long-Term Development of the Artisanal and Small-Scale Gold Mining Sector in Paraguay - planetGOLD Paraguay* (GEF ID 11112). Agency: UNEP. GEF Project Financing: \$3,000,000. Co-financing: \$22,000,000.

✓ **Germany 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 addresses the reduction of negative environmental and health effects caused using mercury by the artisanal and Small-Scale Gold Mining (ASGM) sector. The proposal is well drafted and plausible.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany suggests exchanging knowledge with the ongoing GIZ project “Integrated economic development in the extractive sector in Mauritania” funded by the German Federal Ministry for Economic Cooperation and Development. This project is successfully working on substitution methods for the replacement of mercury in ASGM.
- The risk of corruption and the mitigation of its causes and effects are largely absent in the proposal. Germany assumes that corruption is covered in UNEP’s safeguard system and suggest addressing it in the proposal, if not, please include a proper risk analysis and propose mitigation measures. The same applies to the risk of violence.
- Territorial disputes between artisanal and industrial miners are almost inevitable and must be actively mitigated. Germany suggests setting up a reliable (and digital) registry for land claims.

✓ **United States Comments**

- Paraguay: We believe that this program is well-aligned to the Paraguayan Ministry of Environment’s work and mission goals. We think funding and support for reducing the use of mercury on mining (very much used here to mine gold in Paso Yobai for example), will be very well received by MADES who has a small budget to cover all these various issues.
- We strongly encourage UNEP to work with non-government stakeholders, such as civil society organizations, in the implementation of these projects

23. Eswatini. *Reduced risks on human health & the environment through reduction of POPs & U-POPs in Eswatini* (GEF ID 11272) Agency: UNDP. GEF financing: \$4,935,000. Co-financing: \$31,140,000.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note

them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

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

- While the title of the project suggests a focus on POPs & U-POPs, the proposal describes a broad waste management approach. Germany requests to revise the title and the theory of change, to resolve this contradiction, as this is, from our perspective, currently no POP/U-POP focused project. If the current title was kept, there would be a need for a stronger focus on POPs & U-POPs and thus a need for a comprehensive revision of the project components and activities.
- UNEP developed the BAT/BEP Guidelines relevant to Article 5 and Annex C to assist Parties with their obligations under the Stockholm Convention to promote and require the use of Best Available Techniques (BAT) and the application of Best Environmental Practices (BEP) regarding U-POPs. The guidelines were last updated in 2021. Germany requests to consider these guidelines in the project concept.
- Capacity building measures for local stakeholders in charge of preparation and implementation of NIPs (Stockholm Convention) are not mentioned. Germany requests the reviewing of the Outputs under Outcome 2 – NIP update - in this regard.

✓ **United States Comments**

- We support this project given its potential to improve waste management.
- This project needs to confirm if there has been a contract entered into with the few plastic manufacturers and recyclers, ensuring that they are supportive of an EPR scheme. Otherwise, this project may be over promising and unable to deliver on its goals. It is also critical to confirm the destinations of the international shipments of e-waste before committing to an effort to collect and ship more of them. Also, the proposal should address how the Basel waste amendments will impact this once they go into force during the life of the project. Finally, the PIF does not address whether there are local or regional facilities for sound management of hazardous chemicals or POPs.

INTERNATIONAL WATERS

24. Regional. Bolivia, Brazil, Colombia, Ecuador, Guyana, Peru, Suriname, Venezuela. *Towards a Better Understanding of the Amazon Aquifer Systems for its Protection and Sustainable Management* (GEF ID 11108) Agency: UNEP and IADB. GEF Project Financing: \$13,461,468. Co-Financing: \$131,236,473.

✓ **Germany Comments**

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

Germany welcomes this proposal, which aims at stronger cooperation for improved management of the Amazon aquifer system. Understanding and monitoring groundwater is essential for its protection and sustainable use. At the same time, Germany has the following comments that it suggests being addressed in the next phase of finalizing the project proposal:

Suggestions for improvements to be made during the drafting of the final project proposal:

- Groundwater management is a long-term task. Germany suggests considering stronger capacity development activities, especially under component 5 and including with the Amazon Regional Observatory, to ensure the continuity and sustainability of the project results. Given the high costs of groundwater study and management in large aquifers, the project would benefit from clearer scoping of existing knowledge gaps and how and where these will be reduced through the project, and from more clarity about what is realistically achievable with the available budget and time.
- The Amazon Aquifer Systems are located far from capitals and political centers. Germany therefore suggests working with municipal and local authorities in addition to national governments. These will make sure that governance mechanisms and project activities are implemented on the ground, that communities are involved and that regulations are enforced. The involvement of indigenous/community leaders and other groups of civil society should also be mentioned, as appropriate.
- Germany suggests strong cooperation with other projects, including the substantial portfolio of German Cooperation with national and regional partners, such as OCTA.

✓ **Japan Comments**

- We recognize that the 1:7.5 overall co-financing metric cited may have been inflated by a few private-sector/corporate-related projects. Of the regular projects, we observe the very large co-financing ratios in industry-related projects in sectors such as power generation and construction, and suspect these may have contributed to this overall boost. We hope that these risks are taken into account in project designs, and recommend careful review to back check these figures assessed, which may also affect the value of the grants proposed.
- Furthermore, since some of these industry projects relate to the sectors (hydrogen in particular) that could be easily financed by risk-tolerant private capital, we may want to

consider additionality issues much more carefully (for example, by prioritizing/ prompting re-allocation of capital in other themes/areas that can't have such easy access to markets for funding, even if it may have less co-financing ratios, or considering NGI path as an option).

- We should be leaving these initiatives to the handling of the private sector, to avoid unnecessary politicization and other reputation-related risks for the GEF. We therefore recommend projects with these characteristics to be subject to a second review by Council with more information before CEO endorsement.

25. Regional. Djibouti, Egypt, Eritrea, Jordan, Yemen. *Promoting sustainable fisheries management in the Red Sea Large Marine Ecosystem (RedSeaFish project)*. (GEF ID 11113) Agency: FAO. GEF project financing: \$6,192,694. Co-financing: \$40,300,000.

✓ **Germany Comments**

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

Germany welcomes this proposal, which addresses overfishing in the Red Sea through strengthening regional collaboration and management for sustainable shared fisheries in the Red Sea. At the same time Germany has the following comments that it suggests being addressed in the next phase of finalizing the project proposal:

Suggestions for improvements to be made during the drafting of the final project proposal:

- The perspective of national food and nutrition security is an immediate driver of improvements of fisheries management, however, currently receives little attention in the proposal. Germany recommends its stronger integration, e.g., by strengthening a nutrient-sensitive approach in national fisheries management and integrating it in health policies as well as supporting income diversification.
- Germany recommends a critical re-evaluation of the “low” risk assessment of critical risk categories “Political and Governance”, “Strategies and Policies” and “Macro-economic”. Given the lack of concrete evidence of serious public commitments/ engagement of the involved countries at the regional/international level in recent years, their ownership and commitment remain questionable.
- Those providing services to the fisheries sector in terms of making/repairing nets as well as processing and selling fish products (especially women) are named as explicit target group, however, it is unclear from which output they will benefit. Germany would welcome additional information on this point.
- Online/virtual training and information exchange are expected to play a significant role. Germany recommends ensuring that reaching out to SSF actors with no digital literacy is sufficiently considered. Germany would further welcome evidence for the long-term effectiveness of virtual training as compared to in-person training.

✓ **United States Comments**

- Yemen: We believe that Yemen will benefit from regional coordination, however its challenges are deeper than poor coordination (Component 2). This proposal should include added consideration on how other least developed countries, like Yemen, can contribute to the program's objectives, specifically with regards to fisheries data collection and management (Component 1). Additionally, Yemen likely has outdated national fisheries regulations and management frameworks (Component 3). Implementing those regulations and frameworks are challenging in the current context, especially as Parliament is rarely in session and the ROYG lacks a comprehensive budget.

26. Regional. Eswatini, Mozambique, South Africa: *Strengthening integrated transboundary management of the Incomati and Maputo river basins* (GEF ID. 11180). Agency: UNDP. GEF project financing: \$7,105,936. Co-financing: 23,600,000.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany welcomes this proposal, especially component IV to support sustainable livelihoods through enhancing water, food, energy, and environmental security. Germany recommends strengthening the consideration of groundwater within this component. In many regions of Sub-Saharan Africa, renewable groundwater resources are currently used to a limited extent and have the potential, if used and managed properly, to enhance water and food security and to contribute to socioeconomic development and job creation.
- Germany supports the cooperation with the SADC-GMI on groundwater topics. Additionally, Germany recommends linking the proposed project with the activities of the Pan-African Groundwater Programme (APAGroP) of AMCOW.
- Germany acknowledges the consideration of climatic projections such as an increase of extreme floods and droughts in the project region. Depending on local conditions, managed aquifer recharge (MAR) may be able to contribute to flood risk management measures. Germany suggests examining the feasibility of MAR options that store the water underground and make it available for dry seasons.

27. Regional. Ecuador, Costa Rica, Colombia, and Panama. *Beyond 30x30: Securing resilience in the Eastern Tropical Pacific through enhanced transboundary cooperation* (GEF ID: 11267). Agency: CI. GEF Project Financing: \$14,378,899. Co-financing: \$53,383,037.

✓ **Germany Comments**

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

Germany welcomes the effort to build on demonstrated political will by the four participating countries to develop a regional transboundary agreement under CMAR, to secure the protection and sustainable use of the region's biodiverse oceans and coastal zones. Many synergies with existing projects in the region are explored and lessons learned from international experiences utilised.

Suggestions for improvements to be made during the drafting of the final project proposal:

- The full proposal should more clearly outline how the proposed work programme addresses the root causes of the environmental problems in the region. In this context it needs to be stated which definition of a Blue Economy the countries and region adopt. It needs to be emphasised that environmental protection forms an integral part of developmental agendas.
- Good governance relies on evidence-based and transparent decision-making. To accommodate multiple economic demands in a shared ocean space, adequate multi-sectoral data need to be gathered and curated, and conflicts addressed in a participatory setting. Marine spatial planning is a process that supports ocean governance in such complex settings, and it is recommended that it is promoted by the project as a method to achieve the balance between protection and sustainable utilisation of marine resources in the ETP region.
- The BBNJ framework offers an opportunity to strengthen regional ocean governance in the ETP region and contribute to global protection targets. The project can make use of this ambitious global political process and should make links to BBNJ.

28. Global: Costa Rica, Kenya and Vanuatu. *Plastic Reduction in the Oceans: Sustaining and Enhancing Actions on Sea-based Sources (PRO-SEAS)*. (GEF ID: 11166). Agency: FAO. GEF project financing: \$7,105,936. Co-financing: \$49,151,264.

✓ **Germany Comments**

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

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

- The global component requires further development and should contribute to the ongoing negotiations for a global plastics treaty and the alignment with existing frameworks such as MARPOL.
- The ambition level of outcome 1.2 indicator 2 should be raised to target and ensure regional SBMPL action plan implementation. To achieve this, the indicator could be changed to: “At least one regional action plan on SBMPL developed and at least one regional action plan on SBMPL implemented to at least 50%”.
- The development of NAPs for SBMPL should align with future or already existing National and Regional Plastic Action Plans.
- Component 3 should be reframed to avoid a non-existent management of SBMPL.
- The link and the risks between ALDFG and IUU fishing needs to be better explained.
- Other recently discussed options, such as leasing systems, should be considered in the PIF.
- The development of Biodegradable Fishing Gear is still in its infancy, which should be highlighted in the PIF. Actions in this field need to be undertaken with caution and according to the precautionary principles. Please propose risk mitigation measures accordingly.
- Additional Costs for Small-Scale fishers for new materials, circular systems and marking technologies need to be considered. Local communities and the informal sector need to be engaged from the very beginning to ensure a Just Transition.

LAND DEGRADATION

29. Haiti. *Land degradation neutrality initiative in Southern Haiti* (GEF ID: 11238). Agency: FAO. GEF Project Financing: \$5,417,361. Co-financing: \$20,175,990.

✓ Germany Comments

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

Germany strongly welcomes this proposal to promote SLM for the recovery and restoration of landscapes in the South of Haiti, particularly as it follows an integrated landscapes approach.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Show how policy coherence regarding this project is ensured, especially among key ministries, such as MoE and MinAgri, and Ministry for planning. Also clearly point out how project impacts the achievement of all three Rio Conventions’ target systems, i.e., how the setting and achievement of LDN targets in Haiti positively effects existing NBSAP, NCD and NAPs in the country.

- In Output 1.1.1, (a) create synergies through considering existing national targets for biodiversity and climate change mitigation/adaptation and other sector strategies such as water or food security, with which to align and to harmonise the newly set LDN targets; and (b) align measures for LDN target setting with projects of UNCCD Global Mechanism, which runs a project supporting party countries in setting their national LDN targets; (c) be aware of eventually ongoing process in Haiti to revise and adapt the NBSAP to the New Global Biodiversity Framework (GBF), to align the LDN target setting with.
- Public stakeholders like BAC might need additional support to be able to participate in this project (e.g., fuel for transportation to the communities). Likewise, the proposal includes gender aspects and the involvement of women, even in a quantified way, which is however not reflected in the objectives and indicators.
- To strengthen ownership, ex-ante cost-benefit analyses can make very clear to farmers the return on investment they can expect in the medium and long term, with the support of the project.
- In Output 1.1.2., (1) analyze whether new committees are needed, as currently all the forementioned institutions are members of the local Civil Protection Committee; and include local civil society at a lead level; (b) consider existing national/regional/local strategies and plans. In Output 1.1.3., the participation of MdE and ANAP should include the existing plans in their field of work to avoid duplication. In Output 2, activity 2.1.1.1., AND Output 3, integrate local food items such as yams, mazombel, plantains into the lots, which can contribute to food security, lower dependence on imported food and generation of small income during the phase of growth of agroforestry/forestry systems.

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

MULTI-FOCAL AREA PROJECTS

30. Lebanon. *Community-based Wildfire Risk Management in Lebanon's Vulnerable Landscapes* (GEF ID 11117). Agency: World Bank. GEF Project Financing: \$3,458,000. Co-financing: \$126,000,000.

✓ Germany Comments

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

Germany welcomes this comprehensive proposal, which aims to reduce wildfire risks by improving sustainable forest landscape management in selected hotspots in Lebanon. The project interventions aim for sustainable management of around 22,086 ha of forest landscape, which has been identified with a high risk for forest fires, as well as very high exposure to land degradation. This is critical, not only from an environmental perspective, but will also contribute significantly to peoples' livelihoods and economic activities. The project aligns well with Lebanon's national priorities, has a very strong mitigation co-benefit, focuses on community-based forest management with a gender-inclusive approach, and presents a strong element for cross-learning and engagement, both nationally as well as with other countries having similar risks.

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

- Germany strongly suggests including a climate rationale, clearly highlighting the role of climate change in increased wildfires in Lebanon, based on present and future climate trends.
- Germany suggests a comprehensive study on both direct and indirect drivers of forest land degradation in Lebanon, and their contribution to wildfire risk to forests.
- Germany appreciates the gender-responsive and community-based approach to forest management, however, the extent to which communities are dependent on forest land for their livelihoods and economic activities, which can contribute to increased land degradation, must be clearly articulated and addressed in the project activities.
- Germany recommends including a robust exit strategy and a plan for community ownership of the interventions to ensure the project development objective (PDO) is met.
- Germany appreciates the high co-financing commitment from the World Bank financed Green Agri-food transformation for economic recovery (GATE) project, however, there needs to be clarity on the alignment between the two projects and the GEF interventions for which co-financing has been sought. Since the project involves very high co-financing, Germany suggests ensuring the implementation of a sound financial risk management plan.

✓ United States Comments

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given

that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

31. Georgia. *Transforming Policy and Investment through Improving Ecosystem Management and Restoration of Degraded Drylands of Dedoplistskaro Biosphere Reserve in Georgia to Generate Multiple Environmental and Socio-Economic Benefits* (GEF ID 11141). Agency: UNEP. GEF Project Financing: \$3,552,970. Co-financing: \$24,875,000.

✓ **Germany Comments**

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

Germany welcomes this proposal which aims to improve biodiversity conservation and sustainable management of degraded drylands in an integrative and collaborative manner as highly relevant and well aligned with national strategies. The selected biosphere area offers an ideal platform for the targeted CO2 mitigation, sustainable pasture management and optimization of agriculture that is of particular relevance. Still, it needs to be remarked that the claim to establish the first biosphere reserve (p. 4 & 20) might be a bit misleading as it already exists.

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

- With view to the GIZ Project "Supporting climate-friendly forest management in Georgia (ECO Georgia)" (p. 37), Germany concurs that the project is of relevance for the proposal, yet requests that it should not be considered a co-financing, given that Germany as a member of the GEF council cannot co-finance GEF projects.
- Germany sees a large potential for synergies with work supported by German development cooperation and recommends exploring synergies with the GIZ project ECO.Georgia as well as the DIAPOL-CE project (Policy Dialogue on Low-Emission Strategies and Resilient Economic Development; financed by BMUV). As DIAPOL-CE is implemented in Georgia together with REC Caucasus, the coordination seems rather straight forward. Presumably, this project is not mentioned yet as the GEF proposal might have been developed prior to the commissioning of DIAPOL-CE.
- Besides building on synergies with the above-mentioned projects, Germany strongly suggests a close alignment and coordination (ideally via the Ministry of Environment and/or Municipality) with other ongoing projects of donors (Green Climate Fund, SDC, BMZ, BMUV) to not only maximize synergies but also to mitigate the risk of conflicting advisory approaches.

- Germany sees the need to further elaborate on the logic and well-established overall ToC (p. 14) and to clearly link the output and outcome level to measurable indicators for each component instead of only referring to total amount of area, beneficiaries and CO2 mitigation potential that is not explicitly linked to the outputs and planned activities.

✓ **United Kingdom Comments**

- Good to see the focus on biodiversity, may also be worthwhile highlighting how this leads to socio-economic benefits?
- There are different kinds of conservation, what consultation has taken place with local stakeholders, especially local experts on what they have already been doing, to establish the existing Biosphere Reserve? GIZ have done quite a bit of work in this area, therefore a useful partner to link up with.

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

32. Honduras. *Generating opportunities for livelihoods and biodiversity through participatory governance of natural resources and the economic diversification of the communities of the central forest corridor of Honduras* (GEF ID: 11213). Agency: FAO. GEF Project Financing: \$5,329,453. Co-financing: \$39,900,000.

✓ **Germany Comments**

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

Germany welcomes the proposal, which seeks to reduce fragmentation and degradation of the eastern forest corridor of Honduras. At the same time, Germany has the following comments with a view to improving the document and requests these being addressed in the next phase of finalizing the project proposal.

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

- The coherence and logical consistency of the description of the project can be strengthened throughout the proposal, especially with respect to seeming inconsistencies between the description of problems and barriers under project rationale (A) and the description of barriers and the theory of change under (B).

- However, in the description of the outcomes under component 1, the proposal focuses exclusively on policy, institutional and procedural elements and instruments pertaining to OECMs and the outputs does not specifically address the amendment of national or regional policy framework beyond the issue of OECMs. Therefore, Germany would welcome an increase in the specificity of the description of current shortcomings of the regulatory framework and reference to, where relevant, regulatory and policy elements that go beyond OECMs.
- Likewise, Germany would welcome the inclusion of a reference to CBD decision 14/8, and the voluntary guidance on integrating OECMs and protected areas included therein, in relevant parts of the proposal relating to component 1.
- Germany sees potential for improving the rationale and indicators of component 3, which are in part focused on standard procedures of projects. Germany requests, that the indicators, which are currently all at the level of outputs (simple products), to be at least in part amended to focus on the actual use of said outputs by relevant stakeholder groups, in line with established practice in other GEF project proposals.
- Similarly, with respect to component 2 the current indicator inly refers to the percentage of women as beneficiaries of a financial mechanism or partnerships to be developed by the project. While this is an important metric, an adequate measurement of the actual outcomes of this component would however comprise complementary indicator on the extent of the financial mechanism, be it either in terms of expected number of beneficiaries or in terms of estimated financing volume mobilised. Therefore, Germany requests that an additional indicator is included to complement the current one, being cognizant of the need that the baseline and quantification could be determined during the PPG phase.
- Germany welcomes that the contribution to the implementation of the Kunming-Montreal Global Biodiversity Framework is outlined in the proposal, but requests that the currently outdated and incorrect attribution to specific GBF targets be updated in line with the GBF adopted at CBD COP 15.
- Germany appreciates the plan to develop a grievance redress mechanism that provides a transparent and accessible process for indigenous communities to raise concerns and resolve disputes related to the project. Germany recommends to actively strengthen and capacitate these groups not only in their management but in their monitoring role (PIF, p. 36).

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to

conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

33. Mexico. *Ecosystem restoration and sustainable livelihoods in the Biocultural Corridor of the Central West of Mexico (COBIOCOM)*. (GEF ID: 11249). Agency: FAO. GEF Project Financing: \$8,932,420. Co-financing: \$51,156,135.

✓ **Germany Comments**

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

Germany welcomes this proposal, as it focuses on promoting interinstitutional coordination for a biologically relevant geographical area of Mexico in which biodiversity and ecosystems are subject to a diverse set of strong pressures. However, Germany has the following comments regarding the proposal and suggests these be addressed in the next phase of its finalization.

Suggestions for improvements to be made during the drafting of the final project proposal:

- The full proposal should include a reference to the update of Mexico's NBSAP, the National Biodiversity Strategy (ENBIOMEX), in accordance with the provisions of the Kunming-Montreal Global Biodiversity Framework, which should in its new version guide the implementation of the present proposal.
- Additionally, Germany suggests that the project closely collaborates with the National Association of Environmental Authorities (ANAAE), the support of which will be essential to facilitate the participation of subnational governments and replicating results in states not directly participating in COBIOCOM.
- Several projects of bilateral and multilateral cooperation are currently being implemented or under preparation that pursue similar objectives. Germany therefore suggests seeking out close coordination during project implementation and to include references to the following ongoing bilateral projects in Mexico that can offer synergies for implementing the present proposal: "Cumbres Resilientes" (21.2237.2), that overlaps geographically with the states selected for COBIOCOM, as well as "Vida y Campo" (21.2130.9) for the topic of good agricultural practices, which could be replicated in the context of COBIOCOM under component 2. Additionally, the regional project "PoliLAC" (21.9000.7), which will start in 2023, will focus on Jalisco, offering synergies given the importance of this state as producer of agricultural goods with high dependency on pollination services.

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on

sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

34. Regional: Angola, Namibia, South Africa. *Mainstreaming Climate-Resilient Blue Economy in the Benguela Current Large Marine Ecosystem (BCLME) Region* (GEF ID: 11282). Agency: UNDP. GEF project financing: \$10,484,931. Co-financing: 25,000,000.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

Background on a corruption case: The so-called “Fishrot Files”, an archive of more than 30,000 documents hosted on WikiLeaks are testimony of the widespread corruption and bribery by an Icelandic company in the Namibian fishing industry, involving the fraudulent awarding of licences via the state-owned company Fishcor and tax evasion via shell companies. The case was first exposed in November 2019.¹⁰ Among others, competitive tendering processes for licences were bypassed by loopholes in a bilateral agreement with Angola.

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

- The UNDP-GEF project in question has been supporting the sustainable management of the BCLME through 3 previous financing phases, with the first one initiated in 2002. Germany advises to undertake a screening of past project phases to assess the nature of the relation of the project with the actors of the corruption scandal.
- Given the scope of the past corruption scandal in the Namibian fishery sector, Germany advises the project to consider additional measures promoting anti-corruption and good governance in the sector.
- For the current phase, it is important to strengthen policy, strategy and regulatory frameworks to avoid loopholes between the three countries. Monitoring, surveillance, and control of pollution as well as overfishing and illegal, unreported and unregulated fishing practices could potentially be done by joint resources (coast guards). This could also be an additional measure to reduce corruption and a regulatory and supervisory race to the bottom. The ‘polluter pays’ principles should equally apply in case of maritime

cross-border pollution. Company beneficial ownership information in the extractive, fishery as well as tourism sector should be registered in public databases. Especially private sector beneficiaries of the project have to be known and conflicts of interest of politically exposed persons should be ruled out.

- Furthermore, the project proposal would benefit from a more clear, concise and structured revision of the Theory of Change. The current proposal lacks details on the targeted sectors of the blue economies in the partner countries.
- Germany welcomes the project output on developing bilateral fisheries agreements, however, we would welcome to include more concrete steps regarding their implementation, e.g., through strengthening of monitoring, surveillance, and control systems in the country. Since only output 1.1.1 directly addresses this problem (IUU) the corresponding text in the problems section should reflect this accordingly.
- Please ensure a sufficient graphics resolution (Fig.1) and uniform text size/font throughout the text to improve readability.
- Germany would like to emphasize that the proposed interventions significantly overlaps with the ongoing regional MARISMA project, which will be implemented in the same target countries until 05/2028. The MARISMA project works on marine spatial planning and the support of declaration of marine protected areas and identification of other effective area-based conservation measures and the sustainable financing. For this reason, Germany requests to exclude the development of cross-sectoral Marine Spatial Plans (MSP) and the development of marine protected area (MPA) management plans from the proposal to avoid duplication of efforts. The focus of this component should rather lie on policy and legal support. Given the limited resources this would ensure efficient exploitation of synergies and investments.
- The revision of this PIF should ensure that synergies with other projects, esp. the extended phase of MARISMA, are well embedded in the design and that any duplication of efforts on the ground are avoided.

✓ **United States Comments**

- Namibia: This project should consider coordinating with SADC Atlantic. This project, which started in 2022, is a project of the SADC and the SADC MCSCC. Funding comes from the U.S. State Department and the grant is managed from the Embassy of Gaborone (REO). SADC Atlantic will run until September 2024. This project will support the MCSCC and the three target states of Angola, Namibia and South Africa to build capacity through four core areas: to check, validate, analyze, and integrate. By building capacity in these areas, supported by tools and procedures, the countries will develop strong engagement in the regional MCSCC center and through this contribute to regional efforts to stop illegal fishing. Given the overlap in region and mandate, we are concerned that BCLME IV and SADC Atlantic maybe be duplicative, not complementary.

35. Panama. *Strengthening ecological connectivity in natural and productive landscapes between the Amistad and Darien biomes* (GEF ID: 11209). Agency: UNDP. GEF Project Financing: \$6,585,388. Co-financing: \$42,800,000.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

Germany welcomes the proposed integrated approach combining the strategic level with landscape management, sustainable economic development and knowledge dissemination while including a wide range of stakeholders in the project design and implementation process.

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

- Clarify the terms "biodiversity-friendly enterprises" and "circular economy" and provide information on economic viability, including real market opportunities and options for added value.
- Germany suggests considering the new EU regulation on deforestation-free supply chains and voluntary commitments by industry in the proposal (e.g., transparency and traceability criteria).
- Define the objectives of "improved management" and "restoration of corridors" through measurable impacts. In addition, "avoided degradation" needs to be defined more precisely, considering SLM and national LDN targets including baseline definition and specification of the applied methodologies.
- Germany requests considering the cooperation with the Linking the Central American Landscape Programme implemented by IUCN with financial support by KfW; and the REDD Landscape III project funded by the German Environment Ministry Support Programme International Climate Initiative.
- While the proposal aims to update the National Forestry Strategy, Germany requests that more attention is paid to the National Forest Restoration Program, as this is one of the sectoral priorities of the current government.
- Germany suggests building on existing structures instead of building new temporary institutional structures (e.g., "working groups" or "inter-institutional platforms").

- State where project sites and indigenous territories (comarcas) overlap and if/how the right to Free, Prior, and Informed Consent of IPs will be guaranteed.

✓ **United Kingdom Comments**

- **Political and Governance:** The PIF features the political and governance risk as a low-level risk. Given Panama's poor record on creating long-term environmental management plans, as well as the 2024 elections will bring about high levels of turnover for government officials, this risk is better rated as moderate, the UK would encourage this to be increased?

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

NON-GRANT INSTRUMENT

36. Regional: Asia and Pacific. *Natural Capital Fund (NCF): Investing in Nature-Positive Agri-Food Enterprises in Asia and the Pacific* (GEF ID: 11062) Agency: ADB. GEF Project financing: \$13,761,469. Co-financing: \$646,350,000.

✓ **Germany Comments**

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

Germany welcomes this proposal which promotes an innovative financing facility managed by the Asian Development Bank to mobilize private sector investment for climate smart agri-food systems projects that protect, restore, and sustainably use natural capital.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Since the NCF aligns with the GEF focal area “land degradation” and refers to SDGs, Paris Agreement and GBF, Germany encourages to include a reference to the UNCCD and respective national LDN-targets.
- It is recommended to further elaborate on the mechanisms such as safeguard systems that will ensure that projects selected for funding avoid or minimize risks for negative impacts, e.g., on indigenous people.
- The ADB may wish to further elaborate on the approach to ensure a coherent and consistent measurement of natural capital benefits from the investments of the NCF.
- Germany would like to encourage the ADB and the NCF to explore collaboration opportunities with the Germany funded project on “Protecting coastal ecosystems in Pacific Island Countries” if mangrove restoration activities will be implemented in the Pacific Islands Region.

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

37. Chile. *Green Hydrogen Facility to Support a Green, Resilient and Inclusive Economic Development* (GEF ID: 11065). Agency: World Bank. GEF Project financing: \$13,761,469. Co-financing: \$450,000,000.

✓ **Canada Comments**

- With regards to green hydrogen, it would also be important to take into consideration the energy efficiency of green hydrogen production, recognizing that it is a typically inefficient process for generation usable energy when the renewable energy can be used directly with additional energy loss in most cases.
- Canada is also supportive of attracting private sector investment partners for these projects.

✓ **Germany Comments**

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

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

- Germany welcomes the initiative, which aims to foster the Chilean hydrogen ecosystem and contribute to reach the targets set in the NDCs. To maximize synergies with existing internationally financed initiative and based on the existing cooperation between the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and CORFO in different hydrogen initiatives, it is highly recommended to emphasize the incorporation of the GIZ team from the German-EU Renewable Hydrogen Development Chile into decision making processes or any other instance where its capacities and technical assistance could be of relevance (p. 14).
- Furthermore, Germany recommends to state more clearly which assumptions led to the goal of the total installed capacity of electrolyzers of 244 MW (p. 10). The same applies to assumptions of women beneficiaries of the capacity development (p. 12).
- In addition, Germany asks to review the emissions factors for grey hydrogen (p. 11) and explain which emissions factor finally have been used to calculate estimated CO2 reductions, as two different values (9,5 kgCO₂eq/kgH₂ and 10,5 kgCO₂eq/kgH₂) were mentioned.

38. Regional. LAC. Yield Lab Opportunity Fund I: Accelerating technology and local innovation for sustainable and decarbonized food systems in Latin America and the Caribbean (GEF ID: 11066). Agency: IADB. GEF Project financing: \$6,000,000. Co-financing: \$44,000,000.

✓ **Germany Comments**

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

Germany welcomes this proposal which provides climate finance and funding opportunities for technological innovations start-ups in the agri-food sector in Latin America and the Caribbean.

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

- While information relevant to the proposed alternative scenario, investment strategy and lessons learnt from early-stage technology VC Funds is included in the PIF, the proposal would benefit from the presentation of a robust framework for investment decision making. The investment criteria set out need to be specified in more detail. Germany also suggests the inclusion of environmental and social impact criteria in the investment decisions.
- While the project rationale of promoting early-stage agro-technological innovations to strengthen and articulate the start-up ecosystem is clear, Germany recommends including a more detailed account of stakeholder engagement to ensure that this objective, as well as the environmental and social impacts of the investments, are achieved.

- To strengthen inclusion of relevant stakeholders and experiences, Germany also highlights the possibility to revise the work of regional / international research programmes and organizations, such as the G13 group, IICA (Instituto Interamericano de Cooperación para la Agricultura) and CIMMYT (International Maize and Wheat Improvement Center). Additionally, Germany strongly recommends coordination and joint work with national bodies, such as Guatemala’s Ministry of Agriculture and the Secretariat on Food Security and Nutrition (SESAN).
- The stated project objective includes contributing towards multiple environmental problems in general, this is currently not reflected in the indicators which focus on carbon sequestration and carbon emission reduction. Germany recommends including more indicators reflecting upon other environmental concerns, e.g. biodiversity and land degradation, to safeguard against possible trade-offs and strengthen existing synergies.
- While the PIF’s project paper provides background information on the calculation of indicators, it is still unclear how the level of estimation has been defined. For example, by calculating the emissions avoided in and outside the AFOLU: *“This was multiplied by a high-level estimation on the potential reduction impact that solutions can have on these emissions and a high-level estimation on the potential that the fund's portfolio companies can capture of this reduction”*. Germany kindly asks to elaborate further on this matter.
- Germany suggests the implementation of a robust gender and diversity framework to safeguard against possible negative outcomes against vulnerable groups such as women and IPLCs.
- Germany further asks to specify which two knowledge products the project will target and how the startup ecosystem in the region will benefit from them.

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

39. India. *Guarantee Mechanism for Renewable Biogas Initiative* (GEF ID: 11068). Agency: World Bank. GEF Project financing: \$13,761,468. Co-financing: \$705,000,000.

✓ **Germany 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 support the energy transition in India with a particular focus on greenhouse gas (GHG) emission reductions, energy security, restoration of degraded land, and sustainable management of agricultural-residue and organic waste. At the same time, Germany has the following comments that it requests being addressed in the next phase of finalizing the project proposal:

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany appreciates the description of the outcomes. Yet, the second outcome of the proposal seems vague and would benefit from a more precise formulation.
- While the project rationale is clear, the proposal lacks consideration for how the implantation of a biogas sector in India will look like and which target groups will be addressed. As mentioned, the sector is nascent, meaning that, it will need to be scaled-up. The proposal would benefit from how logistic or cultural barriers will be addressed (e.g., for the involvement of women).
- To ensure environmental benefits of the intervention, Germany recommends:
 - Monitoring of soil organic carbon levels through fermented organic manure usage needs to be coherent on the basis of good scientific standards, e.g. by performing sampling exercise in different agroecological zones and taking into account various other drivers of GHG emissions from soils
 - Complementing with TC to help farmers to transition to sustainable rice production practices including usage of FOM, taking into account climate risks
- Monitoring agricultural practices to avoid perverse incentives that would maximize residue output instead of increasing productivity in sustainably ways
- In addition, Germany recommends to state more clearly how the estimations for up to 100 bio-plants were made and, according to objective 1.2 of the GEF-8 CCM Focal Area Strategy, to which extent decentral solutions are taken into consideration.

✓ **Switzerland Comments**

We generally welcome this innovative, well designed, efficient project/program that will mobilize private finance at scale (1:40) and generate significant global environmental benefits. However, we have the following questions:

- The program investments strictly prioritize generation of bioenergy produced by anaerobic decomposition of organic waste including agricultural waste, municipal waste, and industrial waste streams such as sugarcane press mud. Large amounts of waste are required to generate the targeted quantity of biogas. The Program does not describe if it can have negative consequences on poor population that rely on similar biomass for cooking and heating purposes for private consumption and their small businesses. **Has an analysis been performed to assess this risk? What risk mitigation measures could be taken in case there is a risk?**

- **How does the project address or make sure the waste management hierarchy (prevent, reduce, reuse, recycle, recover, dispose) is being respected?**
- Indigenous peoples and local communities have not been part of the initial stakeholder consultations (p. 17) at program design stage. **We would like to get more information on how they will be included in a structured and adequate manner during program implementation.**
- About 5,100 people will benefit from the GEF financed investments, out of which there are only 510 female beneficiaries, only 10%. **Can or how can the number of female beneficiaries be increased?**

The programs states that the gender dimension has been addressed as per GEF policy and clearly articulated in the program, but little information can be found, except (p. 26) that number of women led biogas developers, number of women employed / trained in offices are KPIs for the gender results areas of the gender equity component of the program

MULTI-TRUST FUND PROJECTS

40. Zambia. *Climate-resilient ecosystem restoration and sustainable land management in the Central and Southern Provinces of Zambia* (GEF ID 11212); GEF Agency: FAO. GEF project financing: \$8,265,283 (LDCF) and \$3,544,809 (GEF Trust Fund). Co-financing: \$91,200,000.

✓ Germany 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 increase climate adaptation in local communities, reduce land degradation and enhance biodiversity conservation through an integrated climate-resilient landscape management approach in the Central and Southern Provinces of Zambia. Germany appreciates the youth-centric, gender-responsive and whole-of-society project approach which aims to enhance climate-resilient natural resources management practices through behavioral changes, capacity building, education, and resource-based livelihood opportunities.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany notes the project's important objective of strengthening the enabling policy environment for forest restoration and conservation. Yet, the PIF notes that the central government has farm and agricultural policies in place that incentivize the clearing of standing forests on agriculturally productive lands. This is compounded by a lack of clarity around land tenure and forest use rights in communal areas. While the PIF does a comprehensive job in addressing barriers, Germany requests further clarity on how this project intends to strengthen the enabling policy environment while competing farm policies incentivizing land clearing for agricultural production.
- We further recommend to closely engage with the Accelerate Water and Agricultural Resources Efficiency (AWARE) and Sustainable Agriculture for Forest Ecosystems (SAFE)

projects. These projects overlap with the proposed project region. AWARE is implementing landscape restoration measures and is currently planning a second phase of the project (expected to start Oct/Nov 2023).

- Germany would further like to acknowledge the Water Resources Management Authority (WARMA) and Water User Associations as additional relevant partners that exist in the project region. The letter could closely work with Community Forest Management Groups.
- We would further like to point out that the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH is an implementing agency – no co-financing will be provided as opposed to statement on p.44/45.

✓ **United States Comments**

- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

41. Djibouti. Sustainable management of water and rangeland resources for enhanced climate resilience of rural communities in Djibouti (GEF ID 11284); GEF Agency: UNDP. GEF project financing: \$2,977,523 (GEF Trust Fund) and \$18,048,624 (LDCF). Co-financing: \$66,300,000.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

Germany welcomes the proposal to enhance the climate resilience of rural communities in Djibouti by improving water access through sustainable water resource management and infrastructure. Improved water management is essential to support Djibouti's rural poor (45 % of

whom currently live in extreme poverty), as climate change will further exacerbate water scarcity and poverty across the country. Similarly, improved flood preparedness is crucial to protect rural communities with limited financial resources to adapt and rebuild as the frequency and intensity of floods increases. Germany also lauds the project's commitment to improving Djibouti's climate adaptation institutional and technical capacities at all governance levels.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany appreciates the project's commitment to gender sensitivity, together with the detailed examples of gender-responsive activities under Components 3 and 4. However, despite several mentions of gender in Components 1 and 2, it is unclear how the activities will specifically be gender-responsive. Germany recommends elaborating examples of such activities.
- Germany appreciates the project's objective of enhancing water and land resource management for improving water security and climate resilience of rural communities in Djibouti. However, Germany inquires how the establishment of sustainable groundwater access points using solar-powered pumps (Output 3.1) could enhance the sustainability of vulnerable communities considering that the maintenance of such pumps requires the adoption of new skills, access to spare parts, and funds to pay technicians and materials. Considerations concerning this matter could be added to the description. Germany further recommends examining alternative water sources and managed aquifer recharge if the geologic conditions are suitable.
- We appreciate the project's goal to restore degraded rangelands using ecosystem-based adaptation (EbA) approaches. However, given high poverty rates, we wonder how immediate survival needs (i.e., in the event of a major drought or flood) will be balanced against longer-term rehabilitation objectives. It would be useful to describe (i) how to ensure community buy-in for closing off historical grazing areas for restoration, and (ii) potential actions to balance the long-term objectives of Outputs 4.1 and 4.2 with immediate survival needs, for both pastoralists and agriculturalists.
- Germany suggests strengthening cooperation with the UNDP African Borderlands Center and the Worldbank's programme "Horn of Africa Groundwater for Climate Resilience" (HoAGW4CR).

SMALL GRANTS PROGRAM

42. Global. *Eighth Operational Phase of the GEF Small Grants Programme* (GEFID: 11285). Agency: UNDP. GEF project financing \$126,186,603. Co-financing: \$126,187,000.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note

them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Canada Comments**

- We have two recommendations for projects to be implemented in the Democratic Republic of Congo:
 1. Include the aspect of using the endogenous knowledge of local communities and indigenous peoples in addition to the benefits derived from genetic manipulation.
 2. Build capacity and equip stakeholders. To date, the DRC's efforts to achieve the "30x30" objective have reached 15.08% through protected areas, community forestry and APACs.
- To this end, we suggest consulting the facts and recommendations raised by participants at the latest "National Dialogue to capitalize on other effective conservation measures by area and recognize the role of local communities in the Democratic Republic of Congo, Kinshasa, May 09-11, 2023" organized by the International Union for Conservation of Nature, IUCN, in collaboration with the GIZ Biodiversity and Sustainable Forest Management Program.

Projects in Ghana (ACCRA-DA):

- Concerns were raised about the government / relevant ministry's capacity to engage and deliver on all initiatives mentioned below simultaneously, since my understanding of GEF initiatives is that recipient countries lead and the agencies support.

✓ **Germany Comments**

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

Suggestions for improvements to be made during the drafting of the final project proposal:

- The formulation of the overarching goal of the programme, as presented on page 16, may be misleading, as it suggests that the ultimate purpose of the project is to make civil society organisations (CSOs) and community-based organisations (CBOs) more resilient and improve their socio-ecological conditions. It should be highlighted that capacities of CSOs and CBOs are to be strengthened with the final goal of achieving improved environmental outcomes at the local level, i.e., developing and implementing landscape seascape strategies.
- The full proposal should make clear how/ with what tools priority setting can be ensured to: 1) select landscapes/seascapes, and 2) agree on priority initiatives in the targeted areas that can maximize environmental benefits. Approaches for how decision-making can be optimized, trade-offs dealt with and competing interests of CSOs and CBOs managed will be necessary, e.g. through the use of Decision Support Systems.

With such a large cohort of countries and contexts, it will be important to capture good experiences regarding priority setting and selection processes to share and learn from.

✓ **United Kingdom Comments**

- We would expect the GIF to identify IP organisations as potential direct grantees alongside CBOs and CSOs.
- The scope of the SGP seems to be very broad, which is likely to stretch the implementing agencies' capacity to provide quality technical support. For example, the inclusion of "sustainable agriculture, fisheries, and food security" as one of the strategic priorities of community-led initiatives and the ambition to support work on value chains.
- The PIF does not reference any other global or regional grant funding activities for IPLCs that are going on in many of the GEF partner countries. We would encourage greater consideration of other global IPLC funding activities and learning from these to inform the SGP approach and vice versa, and how the impact of SGP-funded activities could be enhanced by taking a more coordinated approach at the national level.
- It is not clear from the PIF what the scale and length of grants are to CBOs and CSOs. It is also not clear from the PIF to what extent grants in the 8th operational phase will build on projects to date to ensure some continuity in funding and impact. We would question the value of making one-off grants as this contributes to the unpredictable funding environment that the PIF and think the assumption in the PIF that CBOs could access credit to expand their activities and achieve sustainable impact is problematic.
- We would encourage reference to land or tenure rights, which is a critical barrier many local communities face in tackling environmental issues and investing in more sustainable practices and routinely a key issues local communities raise themselves. It would be good to understand if or how the SGP can support action on tenure and resource rights through its grants?
- There is a need to ensure the IPLC elements of the SGP are consistent with the working group of donors supporting IPLCs set up after COP26. That donor group has indicated an appetite to have a discussion with GEF and other multilateral funds to try to improve coordination and practice in supporting IPLCs. We would be keen to propose further engagement with UK IPLC leads.

✓ **United States Comments**

- Funding going to the Madagascar government should be tracked closely, including to ensure that benchmarks are met, due to corruption present in the government. Funding for reforestation needs to explicitly state Forest Restoration with Native Trees and the focus need to be on growing forests, not planting trees.
- There are few civil society organizations, so it may be difficult to implement this project in Ethiopia as a result.
- Global programs with wide ranges of partners can have their impacts severely diluted in the Pacific and with small island developing States. With this global small grant project, it is not clear how country-level impacts will be realized.

- This project is highly relevant to Cabo Verde's needs and align perfectly with our Integrated Country Strategy mission goal #3, which focuses on strengthening Cabo Verde's resilience to environmental vulnerability and the impacts of climate change, while promoting inclusive development. Therefore, we recommend supporting this project. Implementing environmental solutions can enhance Cabo Verde's resilience to climate change impacts. This initiative has the potential to improve the well-being and socio-economic conditions of local communities, while safeguarding the country's unique natural resources.
- We believe this program is well-aligned to the Paraguayan Ministry of Environment's work and mission goals. We think funding and support for civil society organizations (CSOs) and community-based organizations (CBOs) on increasing resilience to environmental threats will be very well received by MADES who has a small budget to cover all these various issues.
- We appreciate the draft Work Programmes' focus on our planet's most critical forest ecosystems which must be conserved to meet global climate and biodiversity goals. Given that the largest driver of tropical deforestation is land clearance for commodity production we would expect GEF projects to clearly define that problem and orient their work programs towards addressing it. We would appreciate greater emphasis on sustainable forest management that recognizes the need for alternative livelihoods to conserve global forest ecosystems. We would strongly advocate for GEF projects to clearly orient their projects around helping countries decouple commodity production from deforestation.

NON-EXPEDITED ENABLING ACTIVITY

43. Global (Azerbaijan, Bahrain, Cook Islands, Eritrea, Ghana, Mali, Micronesia, Mongolia, Morocco, Peru, Philippines, Senegal, Sierra Leone, Tunisia, Venezuela, Cote d'Ivoire, Thailand). *Technology Needs Assessment Phase V Project* (GEF ID11099). Agency: UNEP. GEF Project Financing: \$5,100,000. Co-financing: N/A.

✓ **Canada Comments**

Projects in Ghana (ACCRA-DA):

- Concerns were raised about the government / relevant ministry's capacity to engage and deliver on all initiatives mentioned below simultaneously, since my understanding of GEF initiatives is that recipient countries lead and the agencies support.

✓ **Germany Comments**

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

Suggestions for improvements to be made during the drafting of the final project proposal:

- The proposal could be clearer on how local ownership of the TNA/TPA process can be ensured in the long-term, e.g., through facilitating the integration of TNAs and TPAs to the national planning process.
- Linked to the question of local ownership, the proposal could provide a more concrete description of how “a transparent participatory approach” can be implemented, to ensure buy-in from a broad range of relevant stakeholders.
- To ensure long-term success, identified technology needs must be adequately addressed. The proposal would benefit from additional information on how the private sector can be brought in already at the TNA/ TPA stage. The creation of matchmaking platforms, for example, can help to connect climate related technology needs to potential supplier markets. Matchmaking could be prioritized in the five new countries who have not conducted TNAs/TPAs in the past: Bahrain, Cook Islands, Eritrea, Micronesia, Sierra Leone.

44. Global (Albania, Armenia, Azerbaijan, Bangladesh, Benin, Botswana, Burkina Faso, Burundi, Cabo Verde, Cameroon, Central African Republic, Chad, Comoros, Congo, Congo DR, Cook Islands, Djibouti, Equatorial Guinea, Eritrea, Eswatini, Gambia, Georgia, Ghana, Guinea, Guinea-Bissau, Kenya, Kiribati, Lesotho, Liberia, Madagascar, Malawi, Mali, Marshall Islands, Moldova, Montenegro, Mozambique, Niger, Nigeria, Niue, Palau, Rwanda, Sao Tome and Principe, Senegal, Sierra Leone, Solomon Islands, South Africa, South Sudan, Sudan, Tanzania, Togo, Tonga, Türkiye, Tuvalu, Vanuatu, Zambia, Angola, Bosnia-Herzegovina, Cote d'Ivoire, Ethiopia, Fiji, Gabon, Micronesia, Namibia, Nauru, Nicaragua, North Macedonia, Qatar, Serbia, Uganda, Zimbabwe). *Umbrella Programme to Support NBSAP Update and the 7th National Reports* (GEF ID: 11281). Agency: UNEP. GEF Project Financing: \$36,435,000.

✓ **Canada Comments**

- We have two recommendations for projects to be implemented in the Democratic Republic of Congo:
 1. Include the aspect of using the endogenous knowledge of local communities and indigenous peoples in addition to the benefits derived from genetic manipulation.
 2. Build capacity and equip stakeholders. To date, the DRC's efforts to achieve the "30x30" objective have reached 15.08% through protected areas, community forestry and APACs.
- To this end, we suggest consulting the facts and recommendations raised by participants at the latest "National Dialogue to capitalize on other effective conservation measures by area and recognize the role of local communities in the Democratic Republic of Congo, Kinshasa, May 09-11, 2023" organized by the International Union for Conservation of Nature, IUCN, in collaboration with the GIZ Biodiversity and Sustainable Forest Management Program.

Projects in Ghana (ACCRA-DA):

- Concerns were raised about the government / relevant ministry's capacity to engage and deliver on all initiatives mentioned below simultaneously, since my understanding of GEF initiatives is that recipient countries lead and the agencies support.

✓ **Germany Comments**

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

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

- See comments above under the project 11286. These comments should be considered for both PDFs of the Umbrella Programme to Support NBSAPs Update and the 7th National Reports.
- With regard to the project organizational structure/institutional framework we noticed some differences to project proposal 11286. Germany requests that the differences between the answers provided by the project proponents of this project and of project 11286 are aligned.

✓ **United States Comments**

- Madagascar: Given the corruption present in the government, funding going to the Madagascar government should be tracked closely, including to ensure that benchmarks are met. Funding for reforestation needs to explicitly state Forest Restoration with Native Trees and the focus need to be on growing forests, not planting trees.
- Ethiopia: The Government of Ethiopia would be receptive to this project but due to staffing changes in EWCA and the Forestry Development office, there may be delays on implementation.
- Papua New Guinea, Solomon Islands, and Vanuatu: The proposal needs more clarity with regards to the UNDP request (item 2).
- The High Ambition Coalition for Nature and People is planning a similar technical support and knowledge sharing platform. The grantee should work with the HAC so that there is no overlap of their efforts.
- Cabo Verde: This project is highly relevant to Cabo Verde's needs and align perfectly with our Integrated Country Strategy mission goal #3, which focuses on strengthening Cabo Verde's resilience to environmental vulnerability and the impacts of climate change, while promoting inclusive development. Therefore, we recommend supporting this project. As a Small Island Developing State (SIDS), Cabo Verde can greatly benefit from the implementation of national biodiversity strategies and action plans. These strategies can help preserve and restore key ecosystems that support the tourism, food, and contribute to sustainable development. Implementing environmental solutions can enhance Cabo Verde's resilience to climate change impacts. This initiative has the potential to improve

the well-being and socio-economic conditions of local communities, while safeguarding the country's unique natural resources.

45. Global (Algeria, Antigua and Barbuda, Argentina, Bahrain, Belize, Bhutan, Bolivia, Brazil, Cambodia, Chile, China, Colombia, Costa Rica, Cuba, Dominica, Dominican Republic, Ecuador, El Salvador, Guyana, Haiti, Iraq, Jamaica, Jordan, Lao PDR, Malaysia, Maldives, Mauritius, Mexico, Mongolia, Morocco, Panama, Papua New Guinea, Paraguay, Peru, Philippines, Saint Lucia, Samoa, Seychelles, Somalia, Sri Lanka, St Vincent & Grenadines, St. Kitts and Nevis, Suriname, Tajikistan, Thailand, Timor Leste, Trinidad & Tobago, Tunisia, Turkmenistan, Ukraine, Uruguay, Uzbekistan, Venezuela). *Umbrella Programme to Support NBSAP Update and the 7th National Reports* (GEF ID: 11286). Agency: UNDP. GEF Project Financing: \$28,400,000.

✓ **Comment for all UNDP projects**

Following previous Council decisions related to UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. Project reviews will take into consideration the relevant findings of the external audit and management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

✓ **Germany Comments**

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

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

- Germany is committed to achieving the goals and targets of the Kunming-Global Biodiversity Framework (GBF) and thus welcomes initiatives aimed at contributing to its implementation. Given the urgency of and limited time available for halting and reversing biodiversity loss by 2030, initiatives and activities must be well designed, efficient and achieve long-term and sustainable results. The updating of NBSAPs is only the first important step which must be followed by immediate implementation. Given the size of the proposed project, Germany requests that steps for directly supporting initial implementation of priority national targets is included in the project.
- COP15 of the CBD saw the launch of the NBSAP Accelerator Partnership that will contribute to mobilizing support for countries by various organizations and initiatives. In order to avoid duplicating efforts in countries by different initiatives, Germany would like to request further information on how the coordination with other initiatives aimed at supporting update and implementation of NBSAPs will be carried out.
- Germany has the following specific requests:
- **Component 1:**

- One of the gaps for lack of NBSAP implementation identified in the project proposal relates to weak institutional frameworks. Accordingly, component 1 includes the development and implementation of a comprehensive stakeholder engagement plan. Germany considers strong institutional frameworks and coordination mechanisms a crucial factor for effective implementation of NBSAPs. However, the project proposal does not yet specify how it will contribute to building institutional capacity and fostering long-term cooperation, especially between ministries. Germany would like to request that details on specific tools or mechanism to be used are described in the project document.
- Please also specify target audience and follow-up actions for implementation of the gender action plan and the action plan for eliminating harmful subsidies.
- Further, please specify the meaning of ‘approximation of spatial priorities and spatialized action plan for other area-based targets’. In addition, explain, if countries will be chosen based on priority for GBF Targets 1, 2, 3, 8, 9, 11 and 12. Some countries might have other priorities. Will they not receive support under this project?
- **Component 3:** Under this component, a large number and seemingly unconnected knowledge tools are to be developed. Please specify how the tools build on each other, how different audiences are targeted by the different tools, guidelines etc. and how each of them will contribute to building countries’ capacities for updating their NBSAPs.
- According to the description, in-country implementation processes will be supported by dedicated technical advice from global experts, including technical review of NBSAPs on a demand-driven basis. As per component 1, the proposed project will primarily deal with updating NBSAPs, not with implementation (please refer to our component on including implementation support in the project proposal). Please specify how technical advice, including technical review of NBSAPs, will contribute to the update process and/or the implementation process and why an additional technical review of the NBSAPs should be necessary.
- 3.1.5: Please specify which ‘global efforts’ are referred to here and what kind of support will be provided. Please also explain the NBSAP Forum mentioned in this regard in the description of component 3.
- Please explain the purpose of the various flagship summary reports to be developed. What is the target audience and how are the reports going to support implementation of the project? Since the development of reports of this kind might require many resources (human and financial), Germany would like to request that the flagship reports are only compiled if absolutely necessary for advancing overall project implementation and that these outputs are otherwise dropped and resources be used for direct country support.

- With regard to the project organizational structure/institutional framework, we noticed some differences to project proposal 11281. Germany requests that outline and description in both projects is aligned since they both contribute to the same overall project. In addition, the role of the GPB is not entirely clear. Please specify its exact role in terms of monitoring and providing strategic guidance; what guidance beyond the project outline could be provided; how will it interact with the Global Project Management and Technical Support Unit? Lastly, Germany requests that the project proponents streamline project organization and management to use resources efficiently. This specifically relates to the division of tasks as outlined in the GEFSEC review sheet: Germany requests that the differences between the answers provided by the project proponents of this project and of project 11281 are aligned.

✓ **United States Comments**

- We support funding for environmental damage remediation in Ukraine at a much higher level.
- Papua New Guinea, Solomon Islands, and Vanuatu: This proposal needs more clarity with regards to coordination with UNEP submission (item 6).
- Uzbekistan: The Ministry of Natural Resources recently rebranded itself as the Ministry of Ecology, Environmental Protection and Climate Change.
- The High Ambition Coalition for Nature and People is planning a similar technical support and knowledge sharing platform. The grantee should work with the HAC so that there is no overlap of their efforts.
- Paraguay: We believe the program is well-aligned to the Paraguayan Ministry of Environment's work and mission goals. We think funding and support for updating the NBSAP will be very well received by MADES who has a small budget to cover all these various issues.