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COMPILATION OF COMMENTS SUBMITTED BY COUNCIL MEMBERS  
ON THE FEBRUARY 2024 LEAST DEVELOPED COUNTRIES FUND AND  
SPECIAL CLIMATE CHANGE FUND WORK PROGRAM

**NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the February 2024 LDCF/SCCF Work Program**

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**FEBRUARY 2024 LDCF/SCCF WORK PROGRAM (REFERENCE: GEF/LDCF.SCCF.35/03):  
COMMENTS FROM COUNCIL MEMBERS**

**STAND-ALONE FULL-SIZED PROJECTS**

- 1. South Sudan: Climate Adaptation and Resilience Enhancement for South Sudan (CARES) (GEF ID 11322); GEF Agency: FAO; GEF project financing: \$8,932,420; Co-financing: \$24,132,520**

*No comments received.*

- 2. Burkina Faso: Program to Strengthen Smallholder Resilience to Climate Change (RESI-2P) (GEF ID: 11365); GEF Agency: IFAD; GEF Project Financing: \$8,932,420; Co-financing: \$105,610,400.**

✓ **Denmark/Norway Comments**

Political situation:

- The political situation in Burkina Faso continues to be highly volatile. Working directly with the government in Burkina Faso poses risks.
- Public resources allocated to the agricultural sector have fallen sharply since 2016 due to the security context, because of more resources being allocated to stabilization efforts.
  - What leeway does the GEF have, and what is its position in relation to the those of the TFPs?
  - What is the planned flow of funds in the project?
- While the risk matrix on p. 44 puts emphasis on environmental and social risks and safeguards, the risks and risk mitigation measures related to political instability, insecurity, fiduciary risks (depending on planned flow of funds), and to “institutional capacity for implementation and sustainability” need to be elaborated. For example, the implementing entity (the Ministry of Agriculture), has seen many shifts of their Minister the last 1,5 years. This has an impact on project management and progress. The risk matrix briefly mentions political and governance related risks: “Burkina Faso suffered in the past year (2022) two coups and actually, there is a military transition government in power. The decentralized government structure favor local governance, yet financial limitations and political turnover associated with insecurity weaken the scope of governance frameworks in place”.
  - How does the project envisage to mitigate the risks related to the current political situation?
  - What kind of financial safeguards does the GEF/IFAD plan to put in place to mitigate these risks?

### Insecurity:

- The project plans to operate in two regions, the North and the Centre-West. For the North region the project aims to consolidate the portfolio's achievements in a context of fragility that threatens the sustainability of investments. In Centre-West, the project aims to deploy an innovative and more efficient resilience approach drawing lessons from previous experience with a geographical scaling up to benefit new areas less exposed to insecurity.
- The differentiated approach is important, as the North region is experiencing high levels of insecurity in many of the municipalities, e.g. Titao which is a project intervention commune – almost all of the population in this municipality has fled due to insecurity, and it would probably be difficult to consolidate anything here.
- It is positive that IFAD plans on applying a conflict sensitive and fragility centered intervention strategy, to be able to adapt to the situation on the ground. The document mentions that former IFAD projects, despite recurring threats of insecurity, have developed a resilience approach that has enabled them to achieve significant results: They continue to ensure their presence by maintaining a certain volume of activity in sensitive areas by successfully relying on locally anchored service systems and relays.
  - With many areas of Burkina Faso being inaccessible to external actors, this is a crucial strategy for continuous project implementation. In this context, how does IFAD plan to carry out monitoring at a distance to ensure quality and results?
- The North region is one of the regions with the highest number of IDPs. The project document mentions that IDPs will be included in project interventions, and that the deconcentrated departments of the central administration will be involved in providing guidelines and support aimed at the social inclusion of IDPs and other vulnerable groups.
  - As the project specifically aims to support land tenure processes/formalization, in what ways will the project work on conflict sensitive land tenure arrangements for IDPs?

### Alignment with national priorities and strategies:

- The program is fully in line with Burkina Faso's national strategies, policies and priorities, notably those of the ministries in charge of the environment, agriculture and livestock. Reference is made to key national documents (page 45). It is worth noting that the operational plan of the Ministry of Agriculture 2023-2025 focuses on eight value chains including cereals (rice, maize) and tuber and roots (potato).
- It should as well be noted that the Burkinabe government has just approved an updated National Adaptation Plan in January 2024.
- At a municipal level, alignment of the resilience plans (developed as part of the project) with other municipal plans should be ensured, e.g. regional and municipal adaptation plans. It is positive that the project plans to finance the resilience plans.

#### Focus on gender:

- It is positive that the project has a strong focus on gender. Throughout the project document, this is worded as a 'gender sensitive approach'. During COP28, Burkina Faso signed an agreement on the "Gender Transformation Mechanism in the Context of Climate Adaptation" (GTM) initiative between FIDA, the Bill and Melinda Gates Foundation
  - Could RESI-2P go further, and work with a gender-transforming approach, rather than gender-sensitive, and thus work in synergy with the GTM?
  - In terms of project participants, why is the aim only 45% women?? Why not 50 or 55% women?

#### Synergies with other Danish funded engagements:

- As part of the bilateral cooperation 2021-2025, Denmark is implementing a private sector project aiming at supporting economic operators in Agriculture and two HDP-nexus community resilience projects in the North and Boucle de Mouhoun in cooperation with two international NGOs. The GEF project addresses issues included in these three projects. The private sector project addresses the issue of access to business development services, financing and markets. It provides support to economic operators in various areas including the preparation of a business plan. The youth and gender dimensions are both very important in these three project as also underlined in the GEF project.
- As part of the regional Sahel programme on climate change, conflict, displacement and irregular migration (CCDMP), Denmark as well fund the IFAD trust fund ASAP+ (180 mio. DKK), which aims to finance enhanced climate resilience of smallholder farmers. A project is currently being developed in Burkina Faso with ASAP+ funding. The CCDMP also focuses on knowledge management and learning on good practices for climate resilience in fragile and conflict affected contexts.
- The Embassy would like to request IFAD to reach out regarding synergies between our engagements (geographical and thematic), and sharing of knowledge products e.g. uptake of innovative technologies for agro-ecology, innovative financing models and good practices in the Great Green Wall area of Burkina Faso.

### **3. Lesotho: Nature Based Solutions for Increased Climate Resilience in Vulnerable Rural Communities of Lesotho (GEF ID 11387); GEF Agency: IUCN; GEF project financing: \$8,974,312; Co-financing: \$65,357,500.**

#### ✓ Denmark/Norway Comments

- The PIF is a relevant starting point, that will benefit from some more detailing to make it more informative. The comments from STAP are pertinent and should be incorporated in a revised project document. We particularly agree that the project has not justified how it will ensure innovative financial solutions. The ToC indicates that rural communities will get access to innovative financial instruments, but how this will happen is not clear from the PIF.

- Based on STAP’s comments around resilience as a potential barrier to transformative change, we encourage a clearer description of what type of transformation is meant.
- We welcome the focus of co-designing NbS with local communities and believe this is crucial to the project’s success. The consultation phase must ensure that women and girls are able to influence the design of the project. After the consultation process, the proposal should define exactly which types of NbS will be prioritized.
- We also miss a gender analysis in the project description. A revised project document should for example clearly show the gender disaggregated effects of climate change, and the different roles played by women and men in the targeted communities of Lesotho.

**4. Burundi: Scaling up Nature-Based Solutions for Climate Resilience and Land Restoration across Burundi’s Fragile Colline Landscapes (GEF ID 11397); GEF Agency: World Bank; GEF project financing: \$18,348,624; Co-financing: \$100,000,000**

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**6. Niger: Integrated Management of the Doumeraie of the Goulbi N’kaba Watershed and Adjacent Ecosystems (Maradi region) (GEF ID 11409); GEF Agency: FAO; GEF project financing: \$8,932,420; Co-financing: \$48,880,000.**

✓ **Denmark/Norway Comments**

General comments:

- The current political situation in Niger is very difficult and volatile. Since the coup d’état in July 2023, the ruling military regime has not put forward any plans for a return to constitutional order and now the country is in process of leaving ECOWAS. A situation where most traditional partners have suspended their partnerships with the central State. On this background, cooperating with the military regime poses both fiduciary risks and reputational risks.
- The project document describes some of the risks associated with the current political instability. The risk matrix on p. 29 mentions that the political and administrative context may constitute a major constraint to the achievement of the project’s results. To mitigate risks related to political instability, there will be minimum work at national level, while the majority of efforts will be placed at communal level, to support the ongoing decentralization process and ensure the communes have the technical and logistical capacity to implement the law and support communities and communities themselves have the skills to implement the plans and greener value chains.



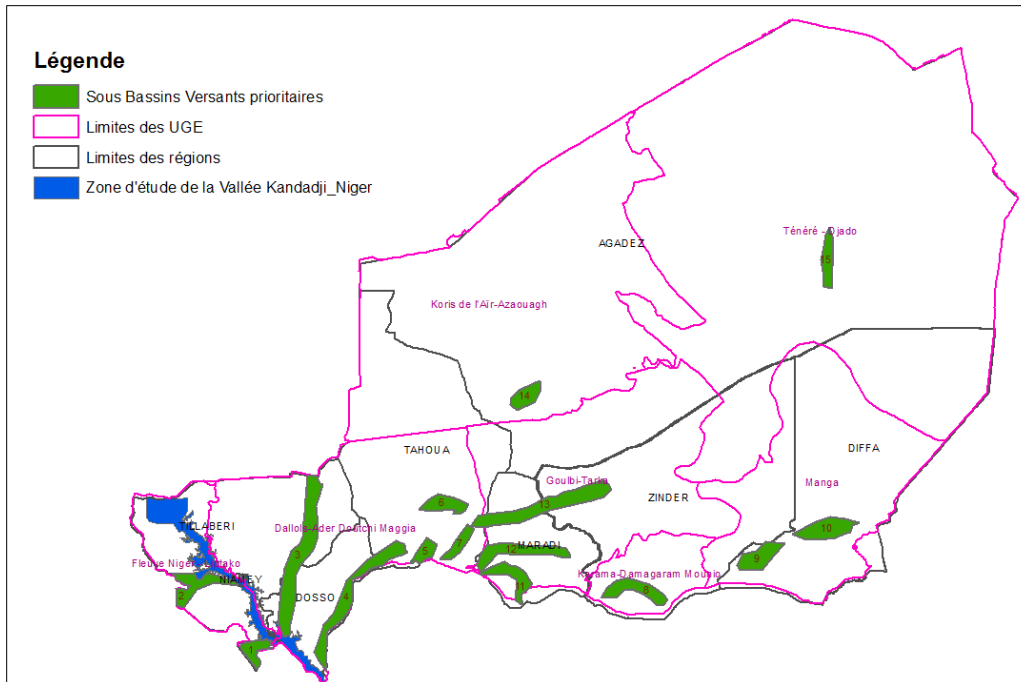
- What is the planned flow of funds? If funds are disbursed directly to central government, this might result in high fiduciary risks and risk of fungibility. All EU-MS and CH have suspended financial support to central government, whereas support to regional and municipal governments (locally elected as part of decentralization process) have continued for some development agencies, under the condition that local authorities remain democratically elected.
- What will be the steering committee setup? Will the central government take part in programmatic and budget decisions? One of the other Danish supported programmes in Niger, Pro-ARIDES (implemented by SNV) has chosen to set up a consulting committee with central government instead of a steering committee, to mitigate political risks.
- The Embassy recommends that GEF-LCDF and FAO find ways of minimizing direct collaboration with the central government, and seek out options to work directly with decentralized local authorities, private sector and other local actors (e.g. CRA/RECA) both when it comes to disbursing funds and making programmatic decisions.
- Risks associated with violent conflict: Maradi is stricken by conflict related too banditry. Right now, Niger finds itself in a very vulnerable security situation, where terrorist groups might spread further, so it will be of utmost importance to set up a flexible, adaptive and conflict sensitive project. The risk matrix mentions that “Political and institutional dialogues organized at national, regional and international level are likely to reduce the risks of this insecurity spreading in the medium and long term”. This conclusion needs to be revisited after the latest political developments.

Specific/technical comments:

- The project in itself is of high relevance for the region of Maradi and for Niger, and seems to build on a thorough review of available data and country strategic priorities. It aligns with priorities in the National Adaptation Plan of 2022 as well as the intervention zone for the Great Green Wall and PANGIRE (national action plan for integrated water resource management, whose development was supported by Denmark until July 2023). A landscape approach that takes into account different interests, needs and livelihoods is encouraged, especially to actively (and peacefully) integrate pastoral livelihoods and resources, who are often under prioritized and underrepresented in national and local planning and investments.
- The objective of the project aligns with the Denmark-Niger strategic framework for 2023-2027 that amongst other objectives aims to strengthen stability, prevent conflict, displacement and irregular migration as well as strengthening adaptation to climate change and resilience with the objective of reducing poverty and preventing conflict drivers by supporting increased and equitable access to water resources, green economic growth, and job opportunities. There are overlapping thematic areas with Denmark’s regional Sahel programme on Climate Change, Displacement and irregular Migration (CCDMP) and Denmark’s former bilateral engagements.
- The consultation process with Nigerien actors for the identification of the proposed project took place in January 2023, 6 months before the coup d’état of July 2023, where a democratically elected government was replaced by a military regime. Since then, Niger’s

foreign relations have changed drastically, and so has the donor landscape, which for now remains uncertain. Maybe there has already been a new consultation process after the coup d'état?

- The project document states that the fight against climate change impacts has become a priority in the Niger's sectoral strategy documents (Nationally Determined Contribution (NDC), the National Strategy and Plan for Adaptation of Agriculture to Climate Change (SPN2A), the Strategic Framework for Sustainable Land Management (SF/SLM) and the Great Green Wall Initiative (GGWI) strategy). This should be revisited in light of the shift of government. The political will and the priority to work on climate change measures might have changed.
- The project could be strengthened by a stronger focus on the water sector, drawing inspiration from analyzes and orientations of the PANGIRE of Niger. This is feasible, as we are currently seeing a merge of the two departments (Environment and Water) in Niger. The Niger IWRM – integrated water resource management – project initiated by the Embassy, (process currently suspended), was focused on the geographical division “Water Management Unit” (UGE – see map below) of Korama in the Zinder region. This project worked with an integrated ecosystem and landscape approach to restore water resources through the development of an adaptation management plan.
- Taking into account the fact that it is now the same ministry which manages the two sub-themes (forest and water) this GEF-LDCF project could serve as a ‘unifying factor’ by taking into account the entire geographical space of the Goulbi-Tarka Water Management Unit and strengthen the IWRM aspect. It is recommended that the project takes into account orientations of PANGIRE in the project planning, to ensure sustainable mechanisms for local water supply at the end of the project. Obviously, this depends on the available budget.
- The Danish Embassy in Burkina Faso would like FAO to reach out for further coordination and information sharing – especially concerning the coordination with PANGIRE, learnings related to climate change adaptation and their experiences with how to promote the decentralisation process through projects.
- Carte Unités de Gestion de l'Eau (UGE) du Niger:



- 7. Maldives: A Holistic Approach to Food Systems Resilience and Adaptation in Maldives (GEF ID 11411); GEF Agency: FAO; GEF project financing: \$2,639,726; Co-financing: \$3,000,000.**

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✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We would like to see additional information on risk mitigation for other non-climate related threats in Prey Lang, including illegal logging, snaring/wildlife trafficking, land grabs, and economic land concessions.
- We note that the collaborators listed on the project do not have significant experience in Prey Lang, and we would like to better understand how these collaborators will apply their knowledge to this unique and complicated region.
- The descriptions of the Boeung and Prey Lang Wildlife Sanctuaries would benefit from a brief description and background on the endangered and protected species that reside in these sanctuaries.

**12. Dominican Republic: Land Degradation Neutrality for Increased Resilience to Climate Change in Dominican Republic (GEF ID 11402); GEF Agency: FAO; GEF project financing: \$1,766,485 (GEF Trust Fund) and \$2,649,727 (SCCF); Co-financing: \$15,156,920.**

✓ **United States Comments**

- If appropriate, we would also encourage that the drought and flood preparedness measures considered under Outcome 2.2 also include preparedness in urban and semi-urban areas.