



COMPILATION OF COMMENTS SUBMITTED BY COUNCIL MEMBERS
ON THE GEF TRUST FUND JUNE 2024 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 2024 Work Program

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**JUNE 2024 GEFTF WORK PROGRAM (REFERENCE: GEF/C.67/03/Rev.01):
COMMENTS FROM COUNCIL MEMBERS**

INTEGRATED PROGRAMS

1. **Global (Algeria, Belize, Benin, Chile, China, Congo, Cuba, Gabon, Guatemala, Kenya, Madagascar, Malaysia, Mali, Mongolia, Peru, Philippines, Serbia, South Africa, Sri Lanka, Zimbabwe). Sustainable Cities Integrated Program (GEF ID: 11287). Agency: UNIDO, World Bank, BOAD, FAO, UNEP, UNDP, DBSA, IUCN, IADB. GEF Program Financing: \$151,840,674; Co-financing: \$1,308,381,941.**

✓ **Germany Comments**

Germany approves the 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 requests a strengthened approach to address inequalities. In addition to gender, focus should also be placed on other disadvantaged groups, as well as the youth. To design a climate-sensitive urban transformation in a socially just way, the youth, minorities and disadvantaged groups (poor & informal, disabled, etc.) must be integrated in order to adequately take their special needs into account and reduce inequalities.
- Germany requests considering corruption risks and mitigation measures in the project risk section. In addition, Germany recommends including corruption risk assessments and the development of mitigating measures in the project designs at country level, giving local civil society stakeholders a role in planning and monitoring. Germany also recommends using transparent infrastructure data standards applicable to climate related infrastructure projects to reduce upcoming corruption risks.
- Germany recommends including the [City WORKS Toolkit](#) as a “good practice and tools and methods developed by partner organizations” under “III. Programm Components (i) Support cities to use various tools to build a foundation for integrated strategic planning” (p. 27).
- Germany requests the inclusion of the Intergovernmental Panel on Climate Change (IPCC) in the partner structure of the project design. In the course of the preparation of the Special Report on “Cities and Climate Change”, the results and implementation lessons from GEF-6 and GEF-7 could provide valuable insights. Moreover, the IPCC (e.g. the chapter on cities in the 6th Assessment Report) provides valuable information and recommendations for sustainable, climate-sensitive, resilient and integrated urban development.

✓ **Norway & Denmark Comments**

- The Sustainable Cities Integrated Program is ambitious and with potential to achieve transformational change. The program rational lists key challenges related to current trends of urbanization, and the most relevant current initiatives that create a momentum for positive change.

- Although gender considerations are met, we find that the gender section is rather short. We encourage a thorough gender analysis to form the basis for each of the child projects to ensure that the potential for a transformative approach to gender is reached. We especially would like to emphasize the importance of including gender representation in the design phase of interventions, and make sure that women are included as designers of solutions, and not merely as beneficiaries.
- We appreciate the weight put on knowledge and continued learning from this important program and look forward to following the results both at global and city level.

✓ **United Kingdom Comments**

- The UK welcomes this programme to support cities and local governments to raise finance and become more sustainable and resilient, and we look forward to updates on this programme.
- We encourage the project to coordinate with others working in these cities with similar objectives, including the C40 Cities Climate Leadership Group.

OTHER PROGRAMMES

2. Global (Africa, Asia/Pacific, Latin America and Caribbean). Global Chemicals Monitoring Programme to support implementation of Stockholm and Minamata Conventions (GCMP) (GEF ID 11534). Agency: UNEP. GEF Program Financing: \$23,500,000; Co-financing: \$65,475,500.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- Germany asks that the project proposal should clearly identify how information on POP and mercury pollution gathered will be made available to national actors, such as environmental and public health agencies, on an institutional level in order to facilitate data usage.
- The program aims to enhance global monitoring of POP and mercury pollution (e.g. Outputs 2.2, 2.3. 3.3.) and strives to facilitate geographically representative data but does not include any countries from the Middle East, Eastern Europe and Central Asia regions, although there are considerable sources of mercury, and POP pollution located there. Germany asks to consider including countries from the mentioned regions or clarify why it is not opportune to include them.
- Further, some of the proposed countries in the program have not ratified the Minamata Convention. This fact and potential implications for the program should be considered as well.

- The proposal suggests that the programme will contribute to the implementation of the Global Biodiversity Framework (p. 27), yet annex E claims that the programme won't contribute to biodiversity protection. Germany recommends revising this accordingly.
- Germany urges to include a broad group of stakeholders in the subsequent project preparation, as the list of consulted stakeholders appears to include mainly government officials.
- Germany requests clarification on the activities intended to achieve output 3.2. It does not yet become apparent what exactly will be done to enhance partnerships.

✓ **Switzerland Comments**

- 1. It will be crucial to introduce and monitor comprehensive quality and performance criteria for the participating laboratories and persons in the capacity building activities and inter-laboratory (round robin) tests.
- 2. Only laboratories and qualified persons who are willing and capable should be selected and participate in the capacity training courses which should include rigid learning assessments.
- 3. The selected laboratories must have the resources (competence, capacity, independence) to carry out regular analyses and the involved persons must be properly employed and paid. Laboratories that fail the periodic proficiency tests must be excluded. In the past, this unfortunately has not always been the case.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We would like to better understand how the project will consider risk mitigations for access to conflict areas, given that conflict would limit access to expertise and collection of relevant data.
- We would also like to see more details about plans to work with the relevant ministries or build their capacity for future monitoring.
- We also strongly support the inclusion of the IAEA on the proposed global steering committee as they have helped establish Hg analysis capabilities in developing country laboratories.
- We are concerned that the proposal does not include existing networks such as the National Atmospheric Deposition Program in the U.S. or the Asia Pacific Mercury Monitoring Network. These and other successful long term monitoring programs can serve as strategic partners, providing robust capabilities and memberships that include multiple countries. Integration with these networks would also reduce the risk of duplication of efforts, and the ability for the initiative to take advantage of existing expertise and previously developed standards.
- We are concerned that POPs considerations are likely to drive many design decisions at the expense of the needs for mercury monitoring. It is therefore important that the Minamata Convention has a more robust engagement in the governance of the project, more in line with the multiple parties that will be representing POPs concerns (BRS secretariat, Global

Coordinating Group Chair, and Regional Organization Group chair). This might include the direct engagement on technical issues of the co-chairs or designated representatives of the Open-Ended Science Group of the Minamata Convention, and the co-leads for the UNEP Global Mercury Partnership's Mercury air transport and fate research partnership area.

- Laboratories engaged in the initiative should also clearly understand the importance of quality assurance and the need for laboratory intercomparisons. The proposal should also directly address plans for data comparability, including how the data will be gathered and managed.
- The proposal should clarify its timeframe for implementation, to ensure effective coordination with existing mercury monitoring initiatives.

3. Global (Botswana, Cambodia, Colombia, Djibouti, Eswatini, Ethiopia, Kazakhstan, Lesotho, Mozambique, Namibia, Peru, Philippines, Somalia, South Africa, Türkiye, Viet Nam). Global Electronics Management (GEM) Program (GEF ID 11553). Agency: UNIDO, UNDP, UNEP, AfDB. GEF Program Financing: \$60,000,000; Co-financing: \$364,225,000.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- Germany welcomes the objective to improve the sound management of waste electrical and electronic equipment (WEEE). However, the program should also include the management of problematic e-waste fractions for which the costs for environmentally sound treatment exceed the material value or where no local treatment solution exists. These fractions are likely to be incinerated or end up in the environment. Therefore, Germany suggests including a component that enables stakeholders to better understand local recycling options and market opportunities (e.g., further use for local production). Local recyclers should further be trained to process e-waste fractions to the quality required for further processing and shipping, creating better access to international markets.
- Germany appreciates the inclusion of manufacturers into the program. It further notes that for many e-waste fractions additional finance is necessary to make recycling viable in the long term. Germany suggests highlighting financing options with the programme, such as the adoption of Extended Producer Responsibility (EPR) systems. Germany has launched the PREVENT Waste Alliance, which hosts amongst others the Global Action Partnership for EPR, an international partnership established between GIZ, OECD, UNEP and WWF, supporting countries with guidance on in setting up an EPR systems. In the transition to EPR, voluntary e-waste compensation schemes can be considered.

✓ **Switzerland Comments**

- Expected GEF funding and the range of identified key project actors at country level seem inadequate to address program's very high ambition. The project document rightly indicates that acting on e-waste and circularity in electronics require a wider range of actors and

actions, starting with buy-in by global electronic brands located in several developed countries and China. In addition, recyclable electronics, sourcing and e-waste from renewable energies and e-mobility is as relevant as e-waste and circularity related to mobile, office and home appliances. Therefore, it is better on the one hand to take a broader picture on electronics, and at the same time adjust program frameworks and ambitions in line with the available/requested budget, secured partnerships and mandates of the participating project partners.

- Greater role of the CSOs and business associations (related to e-waste, electronics design, imports, sells, repair, and services at large) is needed. They can also play an important role in anti-fake e-waste recyclers (this problem is particularly present in Africa), consumer education and behavioural change. They could be involved through child projects into practical actions, testing and feedback of policy solutions, as well as in knowledge collection and dissemination and agents of change.
- The global GEM team is expected to coordinate with global electronic brands and cooperate with the Circular Electronics Partnership and manufacturers and component suppliers to re-engineer their products and operations to align with cleaner requirements. This task is very important, but it is unclear how much could be done under the GEF project as well as in relation to the Extended Producer Responsibility (EPR) regulations and enforcement as well as other complex issues such as planned obsolescence of electronics.
- Considering that most of the proposed project executing partners are environmental agencies and ministries, their engagement to counter fake e-waste service providers at the level of policy formulation, penalties, and inspections in combination with incentives for the good and reliable sector actors in e-waste processing could prove effective.
- While component 4 on Coordination and Knowledge Exchange includes several useful activities on experience exchange, forums, and coordination, it seems to lack the involvement of civil society, media and educational entities as important actors in dissemination in local languages at country and city levels.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We note that the focus on regulations to force innovation could potentially reduce market access and encourage considering schemes that would also reward producers to encourage innovation.
- We also note that that on pages 62 and 63, the Ministry of Agriculture and Forestry (Türkiye) provided the record of endorsement. It is unclear why the Ministry of Environment, Urbanization and Climate Change of Türkiye did not provide this endorsement.

4. Regional (Burkina Faso, Chad, Ethiopia, Gambia, Mali, Mauritania, Niger, Nigeria, Senegal). Transformation Approach to Large Scale Investment in Support of the Implementation of the Great Green Wall Initiative- TALSISI-GGWI (GEF ID 11455). Agency: UNEP, BOAD. GEF Program Financing: \$77,888,167 (LDCF- \$38,707,662; GEF TF- \$39,180,505); Co-financing: \$2,998,018,615.

✓ **Canada Comments**

In regard to Mali, Niger, and Burkina Faso:

- Canada has some concerns regarding programming in Mali, Niger, and Burkina Faso with regards to funds at risk of being potentially diverted.
- It is important that the project proposal includes strong safeguards and accountability measures to ensure appropriate use of funding. Could the GEF please elaborate on the safeguards in place?
- We would also welcome a better understanding of how civil society actors will be engaged in the delivery of this initiative.

General:

- The program is developed under 4 interrelated components, the first one being about 'gender-responsive, climate-resilient restoration of landscapes' but only 52% of total beneficiaries are women. The program could benefit from targeting a higher number of women, especially as this demographic is the most vulnerable and impacted by climate change, and the most dependent on agriculture for their livelihoods in the informal sector.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- Since civil society and farmers play a key role for the longterm impacts of the project, civil society organisations and farmer associations should play a stronger role in the implementation structures at local and regional level.
- With BOAD the programme has an adequate partner, however, its regional scope may fall short given the overall regional scope of the programme. Germany suggests to consider an additional partner covering the East African part.
- With regard to the water resources management component and the risks mentioned in the project proposal regarding national and regional social conflicts, the involvement of the Lake Chad Basin Commission (CBLT) could be useful. The mandate of this regional organisation, which includes Cameroon, Nigeria, Central African Republic, Lybia, Sudan and Algeria in addition to Niger and Chad (both countries earmarked for the project), includes the management and conservation of Lake Chad and its shared water resources, the preservation of ecosystems and the promotion of peace in the region.

✓ **Norway & Denmark Comments**

- **Relevance** – Overall, the proposed LDCF-program is considered relevant to the geographical context, experiencing accelerating temperature increases, and where implications of climate change are materializing through destroyed crops and food insecurity due to irregular rainfall and reduced available agricultural and grazing land leading to heightened natural resources-related conflicts. The governments in Mali, Burkina Faso, Chad, Niger, Nigeria and Mauritania have demonstrated willingness to address these issues through programs in these thematical areas by investments from the World Bank Group, the African Development Bank, bilateral donors and through other financial institutions.

Mali has, for instance, established a national Climate Fund through UN's Multi Partner Trust Fund Office that enables funding to initiatives that aim to reduce the effects of climate change and to contribute with climate smart natural resources management and agriculture production. The countries have affirmed the need for a stronger coordination between GGW initiatives, national and local stakeholders as well as strengthened absorption capacity of climate finance.

- **Ambitious:** As this program aims at tackling five big problem areas (limited resource management, desertification, livelihood and food insecurity, water insecurity and reduced health and safety) across nine countries, this requires a great effort of coordination among the governments and other stakeholders across borders. These represent quite different political contexts, although the countries represent similar challenges linked to natural resources conservation and climate change degradation. The common approach shall be carefully designed to consider the differences, especially the different types of stakeholders.
- **Secure ownership and sustainability:** It is seen as positive that the program will focus on enhancing the role of local actors and stakeholders in restoring and managing natural resources, as this is a key element to ensure sustainability. It is also important for the program to be sensitive to the local contexts, taking into account the needs of pastoralists and their livestock for example.
- **Added value/coordination:** There are already many different programs under the big Great Green Wall Initiative-umbrella, and many of them are mentioned in the program document. As this proposed approach aims at increasing the impact of all the investments and initiatives made in nature restoration and climate mitigation, it is therefore key to reduce duplication, seek complementarity between different programs, ensure stakeholder participation in coordination mechanisms and involvement from government in the implicated countries. Ownership in the coordination efforts shall also be secured by the implementing stakeholders such as the World Bank, African Development Bank, UNEP and so forth. It is very important to include other ongoing programs within the Great Green Wall initiative in the overview to ensure a complete mapping, such as Desert to Power (climate-resilient infrastructures and access to renewable energy) by the African Development Bank, the Africa Adaptation Acceleration Program (AAAP) by the African Development Bank (Digital Climate-Informed Advisory Services).

✓ **United States Comments**

- Given recent coups in Mali and Niger, we want to empathize that this project should: (i) Embed robust transparency practices and governance safeguards; (ii) Continue to strengthen civilian, technocratic institutions to build local capacity and support long-term development and growth; (iii) Reflect strong political ownership and commitment to reform, as evidenced by Treasury’s bilateral dialogue with the relevant authorities and their implementation track record; and (iv) Minimize the risk of diversion of resources to malign actors.
- With the uptick in extremist violence and a loss of state control in several of the participating countries, implementation risks will be paramount. Given this, could you let us know how the program will address the obstacle cited in the PIF: “The potential for transformation in the GGW region remains hampered by political instability, conflict situations, fragmented efforts, limited coordination among countries and stakeholders and low capacity at multiple levels to tackle the interlinked environmental, economic, and social issues.”
- Regarding scalability and technology, we would like to better understand how the project will address access challenges to technology (i.e. drones to monitor deforestation) that could potentially limit the capacity of technology utilization (i.e. access to internet or smart phones) by local implementors such as farmers or pastoralists.
- If appropriate, we encourage watershed management to be considered in the drought focus and the issue of overgrazing to be considered in the agro-pastoralist and livestock focus.
- We recommend the project to include a sustainable land management framework, plan or development, especially for addressing drought.
- The proposal notes political and governance risks, how will these risks be addressed to ensure local community involvement and access to certain areas?

5. Global (Palau, Rwanda). Global Programme to Support Countries to Upscale Integrated Electric Mobility Systems - Addendum June 2024 (GEF ID 11516). Agency: UNEP. GEF Program Financing: \$3,120,509; Co-financing: \$8,150,000.

✓ **Germany Comments**

Germany approves the 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 recommends emphasising 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 and circularity, with the BMZ funded TUMI E-bus Mission. Germany recommends seeking regular exchanges on project activities for both normative and country-level work.
- Germany strongly recommends a high level of integration with GIZ's bilateral country portfolio in Rwanda to maximize synergies and avoid overlap on their work on electric mobility. Germany would appreciate regular communication and engagement on Rwanda project activities.
- 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, Cameroon). In Senegal, the project is co-financed by Germany with the e-buses pilot study carried out jointly.
- Germany appreciates the strong focus on financing issues and recommends close exchange with bilateral and multilateral development banks working on the electrification of public transport.
- Germany appreciates the comprehensive list of stakeholders that the projects aim to include. However, Germany would recommend a deeper 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.

NON-GRANT INSTRUMENT

6. Indonesia. Indonesia Coral Bond (GEF ID: 11323). Agency: World Bank. GEF Project financing: \$13,761,468; Co-financing: \$156,100,000.

✓ Germany Comments

Germany approves the 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 cautions to list the full USD 150 million bond as co-finance. In essence, the activities listed under Component 1 "Improve Management Effectiveness of Target MPAs to Deliver Measurable Outcomes" will only be implemented by the forgone coupon payments of expected USD 10 million and an IBRD loan (USD 4 million) as part of a USD 210 million World Bank Oceans for Prosperity Project / LAUTRA.
- Germany requests further information about the amount, which will ultimately be used to report, and be tracked by others, as a contribution to biodiversity finance.

- Germany asks for clarification as to who the new investors are that the World Bank would like to attract, especially those who to date have not engaged with these types of financial instruments, and how these new investors will be targeted.
- The proposed project highlights that it will directly contribute to the World Bank Group's Indonesia Country Partnership Framework (CPF) for 2021–2025 (Report Number 157221-ID). We ask for clarification as to whether this only refers to the activities funded by the foregone coupons.
- Germany would like to request that the proposal highlights how the World Bank, or other efforts will address/reduce the threats to the coral reefs in those 4 MPAs to exemplify integrated sustainable development planning and the use of different financial instruments. In addition, we ask for clarification on whether there is an investment portfolio into business and/or infrastructure developments in or around the 4 MPAs. While updated threat assessments may be generate further detail, coral reefs have a range of well-known threats. Infrastructure investments into wastewater treatment and recycling facilities in the vicinities of these MPAs could have a direct win-win effect.
- Germany does not fully comprehend the comment made about the Blue Samurai Bond. Rather than being overlapping, the use of those infrastructure investments could be used as synergies, reducing the pre-identified threats.
- Germany would like to request clarification on the mechanism for determining the final KPIs that will trigger the conservation success payments, as the current wording in the proposal is vague.
- We welcome the inclusion of the IUCN Green List into the project approach, and the linkages to the conservation success payments. We urge relevant actors to incorporate the lessons learned from early GL implementation activities, to be presented by IUCN at CBD COP 16. It would be beneficial for the project to further investigate the use of GL across Indonesia's protected area system so that its application can function as a reliable performance measure, and may potentially be integrated into systems such as EVIKA (used for example in the [KfW projects for marine conservation and coral reef protection in Indonesia](#)). To further strengthen outputs as the relevant factor for management evaluations we would welcome a more specific Theory of Change.
- It will be challenging to distinguish the contribution of this project (achievement of the IUCN Green List Standard in four components with 17 criteria and 50 indicators) from the contribution of the LAUTRA project with regard to improved management (EVIKA Standard in 5 levels, maximum Gold). In the end, achieving the higher standard must be decisive, especially because this causes a disbursement of GEF funds to private investors.
- Germany notes that the four MPAs selected are low hanging fruit because they are already in a relatively good state of management (compared to other marine protected areas in Indonesia). We consider this beneficial for the purpose of private capital acquisition.
- Germany supports the development of MPA business plans and asks elaboration on how the MPAs are intended to be operated using private (income) sources to achieve long-term financial sustainability. We recognize revenue generating activities that focus on tourism

related efforts, yet there is a suite of potential reef-positive businesses that could contribute to generate additional income from the MPAs such as proposed and pursued by Konservasi International (see point 11).

- Germany is concerned about the risk of overlays and potential redundancies of activities as the proposed MPAs in Indonesia are also the focus of other proposals outside the GEF. Most prominently, similar activities are requested to be funded under the Global Fund for Coral Reefs (GFCR) such as the activity to train MPA management units personal or efforts to identify means that help move away from solely grant-based funding and leverage more private sector funding for PA (such as coral reef friendly businesses).

✓ **Norway & Denmark Comments**

- Indonesia has ambitious plans regarding the development of ocean accounting as a tool for better management of their oceans and to enable them to develop sustainable management plans for a sustainable blue economy.
- Ocean accounts include different accounts, such as ecosystem services, carbon, waste, and national accounts (GDP for the blue sectors, which the Indonesians call the maritime GDP).
- From the Indonesian side, the Ministry of Marine Affairs and Fisheries (MMAF), Statistics Indonesia (BPS), the GeoSpatial Agency, the Ministry of Finance, and REKAM Nusantara Foundation are key partners. Norway also supports activities involving the national Task Force on ocean accounts, comprising of over 20 different Ministries and Directorates/Institutions to coordinate the national work on ocean accounts.
- Through the work on ocean accounting, methodologies and standards are being developed, in collaboration with other partners such as Norwegian Statistics, GOAP, UNESCAP/UNSD, WB, and others. Indonesia has piloted the compilation of ocean accounts in several pilot areas (MPAs) and data is being collected. This includes the carbon sequestration ability for coral, seagrass, and mangroves.
- Is the World Bank aware of the Indonesian work to develop ocean accounts and a voluntary blue carbon market, and will a Bond-scheme like the one suggested, conflict with a potential national voluntary blue carbon market?
- The social aspect is very important when working with possibilities to develop a blue carbon market, and this aspect must be just as important when working with a Bond-scheme. Benefit sharing is crucial, and the involvement of local government and civil society from the beginning to secure inclusive processes and long-term sustainability.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We support this project and appreciate its focus on Eastern Indonesia and gender, as well as its innovative outcome-based financing model, which aligns with increasing and enhancing the impact of GEF's Blended Finance Global Program. We have two additional questions:
 - The proposal mentions coordination with other GEF and World Bank programs but doesn't explicitly mention coordination with other donor partners, including the United

States who have, or will have, robust Coral focused and Marine Protected Areas (MPA) management programs in and around marine areas outlined in the proposal. How will the World Bank ensure this coordination will occur as well?

- The proposal says that coral cover and fish biomass will be metrics of success, how will these be measured?

STAND-ALONE FULL-SIZED PROJECTS

BIODIVERSITY

7. Argentina. Ecosystem restoration in seven national protected areas of Argentina (GEF ID: 11490). Agency: CAF; GEF Project Financing: \$6,268,011; Co-financing: \$43,876,075.

✓ Germany Comments

Germany approves the 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 program proposal:

- The proposal details that the seven Natural Protected Areas in which the ‘demonstrative interventions’ on ecological restoration will be implemented have been prioritized according to criteria of threat level and viability to apply prevention strategies. Yet, no further information on the selection criteria is provided and Germany would therefore like to suggest incorporating further details into the analysis in order to assess whether such prioritization is consistent and whether the resources to be applied to the interventions will be used effectively and efficiently.
- The proposal states that ‘knowledge generated in the demonstration interventions will be the basis for the development of a national institutional policy on ecological restoration in protected areas to guide a long-term effort throughout the protected areas system’ (paragraph 20). Yet, it remains unclear how the implementation/adjustment of specific regulatory frameworks and public policies will be carried out. Germany would therefore like to suggest including actions aimed at specific policy implementation within the framework of concrete governmental management instruments.
- In terms of increasing local ownership, Germany would like to suggest implementing genuine participatory dialogue processes with key stakeholders for the development of ecological restoration guidelines and programs (Component 1). We suggest ensuring that the Local Advisory Committees are of a binding nature, thereby facilitating genuine formalized governmental collaboration to address the current challenges of ecological restoration in Argentina's protected areas.
- Finally, Germany suggests exploring potential synergies with BMUV IKI project “Promoting Low Carbon and Climate Resilient Development Pathways for Argentina - ProCLIM-AR”, especially regarding the elaboration of Forest Landscape Restoration Guidelines/Plans,

which should be aligned with Ecological Restoration Guidelines foreseen in the proposed project.

✓ **United Kingdom Comments**

- The UK welcomes the alignment with Argentina's commitments under the Rio Conventions and national environmental policies and complementarity with other related activities.
- The UK recommends that Argentina's commitment remains in place given the government's fiscal austerity policy and changes in government structures, including the appointment of a new President of Argentina's National Park Authority.

✓ **United States Comments**

- Many MDB projects have been stopped or delayed as part of the fiscal consolidation under the current Argentinian administration. Does this project have support to move forward?

8. India. CoHABITAT – Conservation and sustainable management of wetlands, forest and grasslands to secure the population of Migratory species along Central Asian Flyway in India (GEF ID: 11478). Agency: UNDP; GEF Project Financing: \$10,709,174; Co-financing: \$73,100,000.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- In order to strengthen the project rationale, Germany encourages to specify in further detail the activities and actions under each output, since some of them seem somewhat generic at this stage, with the aim to better outline the contribution towards the overall objectives of the components and the project.
- Regarding output 1.1 on national policy, directives and guidelines: Guidance and frameworks for integrated management of wetlands, as well as for management effectiveness already exist, so that the development of a completely new framework is not recommended. Therefore, Germany recommends that efforts should focus on building on and improving existing instruments. There is also an existing knowledge network of the MoEFCC which should be involved as stakeholders.
- With a view to output 1.3 on a strengthened national inventory: The available METT framework released by MoEFCC and the National Inventory and Assessment of wetlands should be taken into consideration for this output. [Wetlands of India Portal \(indianwetlands.in\)](http://indianwetlands.in)
- Regarding output 1.4 on a comprehensive capacity building program: Germany asks to align and coordinate activities and capacity building with ongoing efforts, so as to avoid duplication. Current efforts include, inter alia, capacity building being undertaken by GIZ ([Indo-German Biodiversity Programme](#), [Biodiversity conservation, Business and biodiversity](#), [Biodiversity evaluation](#), [Ministry of Environment and Forests](#), [BMUV](#), [BMZ](#), [GIZ](#)) and UNEP/GEF ([Integrated Management of Wetland Biodiversity and Ecosystem](#)

Services) projects [Untitled-1 \(indianwetlands.in\)](#) and possible synergies should be explored (also see below regarding further projects for cooperation).

- Output 2.2 and 2.3 on landscape management elements: A number of Ramsar sites in the project area/landscape either already have or are in the process of preparing an integrated management plan, which should be taken into account for alignment and coordination as well as lessons learned.
- Germany encourages cooperation and knowledge exchange with the following projects:
 - (1) [Integrated Management of Wetland Biodiversity and Ecosystem Services](#) (GEF-5; ID = 5132)
 - (2) [Wetlands management for Biodiversity and Climate Protection](#) (GIZ funded through IKI/BMUV)
 - (3) [Protecting Aquatic Ecosystems in India's Northeastern Himalaya Region](#) (GIZ funded through IKI/BMUV)
 - (4) [Tamil Nadu Wetlands Mission](#) (Government of Tamil Nadu / TNSWA)

9. South Africa. Conservation, development and livelihoods for thriving people and nature (GEF ID: 11448). Agency: UNDP; GEF Project Financing: \$4,416,208; Co-financing: \$35,265,699.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- Germany welcomes the inclusion of IP&LCs in the project objectives, as well as the recognition of the significant potential social risks for these groups and the development of safeguards to mitigate these risks. Germany recommends further elaboration of the enabling environment for IP&LCs as mentioned in the project objectives. In order to increase their visibility and participation throughout the process, Germany suggests that their involvement in participatory processes be more prominently included in the outputs, especially in Output 2.

✓ **United States Comments**

- All biodiversity is important for nature conservation. There is not an internationally recognized definition for megadiversity and thus it should not be included as a rationale for receiving GEF funding.

10. India. Enhancing the conservation and sustainable use of biodiversity to meet India’s commitment to the Kunming-Montreal Global Biodiversity Framework targets by 2030 (GEF ID: 11423). Agency: UNDP; GEF Project Financing: \$6,649,315; Co-financing: \$56,000,000.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- Germany welcomes that the project recognizes that a strengthened policy and institutional framework for the conservation network in India needs to enable the participation of all relevant public and private stakeholders, including indigenous groups. Germany encourages strengthening and concretizing respective aspects in the description and ultimately implementation of component 1, since –for the moment– involvement of indigenous groups seems to be focused on outputs 3.1 and 3.3 at site level.
- While being cognizant of the complexity regarding the effective incorporation of OECMs in national conservation networks resulting from the large variety of potential forms and contexts of OECMs, a robust and concrete implementation of the guiding principles and common characteristics for OECMs enshrined in CBD/COP/DEC/14/8 is crucial in ensuring actual biodiversity outcomes by OECMs. Therefore, Germany welcomes that the project would contribute to concretizing and fleshing out the existing criteria and guidelines for identifying OECMs in India (May 2022). In this regard, Germany recommends taking into consideration the IUCN site level tool for identifying OECMs for ensuring a high-integrity operationalization of OECMs at national level.
- Germany recommends to consider referring to existing METT tools for protected areas and Ramsar Sites for the development of a framework for management effectiveness for OECMs; to include the National Plan for Conservation of Aquatic Ecosystems (NPCA) in the section on “Existing national strategies and plans” and to also consider the connectivity of aquatic ecosystems in the context of ecological connectivity; to consider identifying relevant and specific target groups for strengthening capacities for the identification and auditing of OECMs; as well as to consider leveraging platforms like India Business & Biodiversity Initiative (IBBI) for engaging the private sector.
- Germany encourages cooperation and knowledge exchange with two projects funded by German development cooperation:
 - (1) [Integrated Tiger Habitat Conservation Programme](#) (IUCN, funded through KfW on behalf of BMZ)
 - (2) [Wetlands management for Biodiversity and Climate Protection](#) (GIZ funded through IKI/BMUV)

✓ **United States Comments**

- All biodiversity is important for nature conservation. There is not an internationally recognized definition for megadiversity and thus it should not be included as a rationale for receiving GEF funding.

11. Namibia. Safeguarding the future of Namibia’s Protected Area Network through Financing4Future (GEF ID: 11523). Agency: WWF-US. GEF Project Financing: \$ 6,140,422; Co-financing: \$ 37,830,161.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- Germany welcomes the integration of other financial mechanisms such as biodiversity bonds, carbon and biodiversity credits, ESG and other mechanisms as they diversify the financial landscape and could provide profitable long-term financial support for the PAN. However, Germany recommends incorporating a high integrity approach in the further development of instruments such as ESG and carbon/biodiversity credits in particular, as significant risks to the environment and IP&LCs can arise from flawed project implementation. Potential risks of "new" financial mechanisms that are not related to the endowment fund are not yet included in the risk assessment.
- Germany recommends a more detailed explanation of the plan to mobilize seed investments and additional resources to capitalize the endowment and sinking fund, as this is a critical pillar for the success of the project.
- While the project summary mentions that the project will contribute to Target 18 of the KM-GBF 2022, the proposal does not clearly identify the specific contributions. Germany recommends that these contributions be further specified.

✓ **United States Comments**

- The United States encourages working with the Ministry of Finance and National Planning Commission to ensure that PAN finance discussions are not hindered.

LAND DEGRADATION

12. Regional (Antigua and Barbuda, Bahamas, Barbados, Belize, Dominica, Grenada, Guyana, Haiti, Jamaica, St. Kitts and Nevis, St. Lucia, St. Vincent and Grenadines, Suriname, Trinidad and Tobago). CSIDS SOILCARE Phase 2 - Caribbean Small Islands Developing States (SIDS) multi-country soil management initiative for integrated Landscape Restoration and climate-resilient food systems (GEF ID: 11390). Agency: FAO; GEF Project Financing: \$ 17,968,099; Co-financing: \$ 26,500,000.

✓ **Germany Comments**

Germany approves the 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 proposal would benefit from specification and clarification of the role and nature of the innovative and transformative elements envisaged to contribute to the expansion of SSM/SLM (e.g., transformative financial instruments and systems; innovations for climate-resilient systems). In this respect, Germany suggests to further elaborate the role and concrete activities of the planned Regional Transformative Initiative as well as on a long-term institutionalised programme on agricultural innovation for LDN.
- Germany highlights the need to give greater consideration to the role of the institutional framework in implementing the LDN approach, given the fact that the limited enabling environment is identified as one of the main barriers to effectively addressing land degradation.
- Germany recommends giving further consideration to how exactly the exchange of knowledge between the two phases of SOILCARE will take place and ensuring that the approaches and tools developed in Phase I are applicable to the countries participating in Phase II.
- The project spans across a wide range of project activities, countries and stakeholders, where coordination mechanisms will be crucial for the achievement of the project objectives and its success. Germany suggests that the full proposal identifies areas of cooperation and coordination between the project activities and stakeholders involved.

✓ **United Kingdom Comments**

- The UK welcomes this project. FAO is a strong and leading regional development partner in this thematic space and has a good handle on needs and it has the footprint and network to deliver. The UK welcomes the opportunity for synergies with other related activities and the broader FAO portfolio.

✓ **United States Comments**

- The United States supports this project and appreciates the focus under Component 3 on capacity building to develop drought tolerant varieties and its plans to work with CGIAR. We also appreciate the project's plans to engage the private sector under Component 4.
- Regarding disaster preparedness and addressing the climate hazards of drought, we note that the project does not describe specific policies the government will implement to be more resilient to drought. We would find more detail in the theory of change to be useful.

13. Mauritania. Rehabilitation and restoration of ecosystems in the Gum Arabic belt and sustainable use of forest resources in Mauritania (GEF ID: 11551). Agency: FAO; GEF Project Financing: \$5,329,452; Co-financing: \$9,300,000.

✓ **Germany Comments**

Germany approves the 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 recommends including in the full proposal existing local AGLC (*Association de gestion locale collective des ressources naturelles*), an approach by the government (Ministry of Environment) and local population supported by German bilateral cooperation, existing in the project area (output 2.2.1).
- As there is lack of data of the state of land, the full proposal should include collaboration with local universities, to collect and produce relevant data and make it available to decision makers on local, sub-national and national level (Output 1.2.1).
- To ensure effectiveness, we recommend including a gender-sensitive participatory value chain analysis for gum Arabic and NTFPs, along with market analysis and development for such products (local markets) or support for export.

✓ **United States Comments**

- The United States would like to see more clarification on how the project will address the overgrazing and livestock issues raised given pastoralists' dependency on grazing land.

CHEMICALS AND WASTE

14. Brazil. Control and reduction of mercury emissions from the cement industry in Brazil (GEF ID: 11574). Agency: UNIDO; GEF Project Financing: \$12,000,000; Co-financing: \$72,000,000.

✓ **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:

- Germany would like to request the integration of a comprehensive mitigation strategy into *Component 1* of the project, as the current promotion of such strategies is lacking.
- Germany would like to request that the project proposal specifies its plan for ensuring that biomass used for cement production originates from sustainable sources only, given the potentially severe impacts unsustainable biomass utilization can have on ecosystems, food security and land competition. The risk analysis needs to reflect on this issue and ambitious environmental and social safeguards need to be in place to prevent and/ or mitigate potential negative consequences.
- Germany would like to request further information on why the proposal does not yet mention green hydrogen as an alternative fuel to fossil fuels/ biomass, given that it is often considered a best available technology and best environmental practice.
- Germany would like to call on the project developers to consider the promotion of alternative and more sustainable building materials for construction through the project.
- In addition to the proposed measures under *Output 2.1*, we would like to request the inclusion of a mass flow balance study and propose the development of a mercury reduction strategy along the value chain.

- The project envisions energy efficiency measures in the cement industry, however, no targeted energy saved is quantified under *Indicator 6.3*. Germany would like to request the inclusion of an estimate of the projected energy saved.
- Given the high corruption risks and past corruption cases in the sector and country, Germany recommends considering corruption risks and mitigation measures in the project risk section as well as in the project design at country level, giving local civil society stakeholders a role in planning and monitoring. Germany also recommends using transparent reporting standards of mercury emissions in cement production to reduce upcoming corruption risks.

✓ **United States Comments**

- We are concerned that the project does not currently establish a list of priorities for all that it seeks to accomplish. It is important to assess the desired prioritization of the many project goals and outputs.
- We are also concerned that the project does not yet have estimations of desired timelines and phases for the projects design and implementation. The proposal should clarify its timeframe for implementation, to ensure effective coordination with existing mercury monitoring initiatives.
- The impact of the project should be expanded through direct consultation with Cement Partnership Areas of UNEP's Global Mercury Partnership. The Cement Partnership is considering a similar approach on a global scale as outlined in their [Business Plan](#), and may be able to provide specific input into the measurement approaches, selection of BAP/BEPs that will be included, and facilitate outreach and communication on the project results to wider audience.

15. Indonesia. Strengthening Indonesia's Reduction and Elimination in the Distribution and Supply Chain of Mercury from National Health (SIRENE) (GEF ID: 11546). Agency: UNDP; GEF Project Financing: \$ 6,590,000; Co-financing: \$ 32,950,000.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- The project summary lists disposal of POP-containing plastics, which is not reflected in the more detailed project descriptions. Germany asks for details on how the POP-containing plastics will be identified, collected and disposed of.
- Germany asks to add the factor of air emissions from facilities handling mercury-containing waste (barriers to be addressed). Air monitoring for mercury storage and processing facilities should also be added to Component 2.

- As Component 2 improves private sector capacity for phase-out and environmentally sound disposal of mercury-containing medical waste, Germany asks to explain how private sector stakeholders will be empowered and whether the process will be monitored.
- Germany proposes to set out how knowledge of technologies for stabilization and solidification of mercury at laboratory scale (Component 3) will be disseminated to private sector stakeholders.
- The section on stakeholder engagement lists that IP&LCs, civil society and private Sector were consulted. Yet, the summary lists mostly private sector companies that will be engaged, not who has already been contacted. In addition, no reference is made to IP&LCs and CSOs are only mentioned very shortly. Germany asks to provide information on who has already been contacted and how civil society and IP&LCs are to be involved in stakeholder engagement.
- Germany recommends that corruption risks and mitigation measures be considered in the project risk section due to the identified limited capacity to monitor and enforce laws in healthcare waste management in Indonesia, as well as the severe restriction of the formally independent anti-corruption agency during the presidency of Joko Widodo, which may persist since Widodo's son is the vice-president elect. Corruption may occur in relation to the storage, treatment, and disposal of medical waste, or related to medical waste workers, data management, appointment of contractors, or in relation to environmental clearance certificates or others and awareness should be raised.

✓ **Switzerland Comments**

- The capacity-building aspect, which is present across several components and will help ensure gender-responsiveness in the project, needs adequate attention and planning as it was cited as a major barrier in the country. Capacity-building activities can integrate expertise to help manage the specific goals of the project, incorporating guidance from the Minamata Convention Secretariat on phasing out MCMDs and from civil society for coordination, stakeholder engagement, and gender sensitivity.
- While taking a circular approach will have many cross-benefits for Indonesia's waste management systems, it is also vital that it adequately plans for safe final storage practices for mercury after temporary storage. This means allocating further resources to this activity and will likely require greater capacity building needs as well to ensure proper disposal.
- Although coordination will be a significant challenge due to Indonesia's diverse geography and lack of systems in place, this also provides immense potential for extensive reach of the new coordination measures in place and expanding sound management of chemicals and waste practices throughout the country. The impact may also be significant in terms of reach, as mercury poses health and environmental risks that are extensive and persistent. These elements should be better reflected in the proposal, as they provide opportunities and may have cross-benefits in different dimensions of life.

INTERNATIONAL WATERS

16. Regional (Angola, Botswana, Malawi, Mozambique, Namibia, Tanzania, Zambia, Zimbabwe). Strengthening Zambezi River Basin Management towards Climate Resilience and Ecosystem Health. (GEF ID: 11572). Agency: AfDB; GEF Project Financing: \$9,450,000; Co-financing: \$320,150,001.

✓ **Canada Comments**

- It is suggested that the project also takes into consideration the ecological connectivity of protected and conserved areas and the services they provide to local communities located within the geographic scope of the project, and how such considerations could be addressed through proposed cooperation.

✓ **Germany Comments**

Germany approves the 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 asks for more clarity on how and if the SADC water division will be involved in the project implementation phase. This would be important to ensure regional coherency on transboundary water management.
- It is appreciated that the proposal reflects different gender aspects of management of shared water resources in the Zambezi River basin. We ask to emphasize the lack of female participation in decision-making on all levels, including the basin level, of transboundary water sharing decision-making as an obstacle to effective and inclusive transboundary water management. In addition, we recommend proposing actions to address this. We would also appreciate it if the proposal would refrain from using the “women as victims” narrative which is used on one occasion. It should rather be used language along the lines “women are most affected”.
- The presented links and synergies to other projects by donors active in the Zambezi River basin and working with ZAMCOM are important and present a convincing case for the PIF. Germany is active in the SADC region and also supports ZAMCOM with capacity building measures. Additionally, Germany is a large supporter of and donor to the Team Europe Initiative on Transboundary Water Management in Africa (TEI-TWM) coordinated by the EU. The TEI-TWM is the EU’s flagship approach to synergise transboundary water management across Africa on different levels of management of shared water resources. How does the planned project plan to create synergies with the German engagement in the Zambezi River basin and the efforts of other European donors, coordinated through the TEI-TWM? Please link the project to the goals of the TEI-TWM.
- In the spirit of the TEI-TWM which puts special emphasis on the coordination between different levels of transboundary water management, Germany appreciates the planned activities on knowledge exchange and peer learning between other R/LBOs in the SADC

region and beyond. There are also other international/ continental actors that are involved with, and have experiences on transboundary water management, such as the African Union Commission (AUC), the African Network of Basin Organisations (ANBO), and the African Ministers' Council on Water (AMCOW). Are there joint activities planned? Especially for streamlining monitoring efforts on the African continent and knowledge management on transboundary water management, the cooperation with continental actors is beneficial.

- We would like to ask for clarification on how the challenge of capacity at member states level is being addressed to ensure successful implementation.

✓ **United Kingdom Comments**

- The UK welcomes the ambition of the project but is concerned about the additionality, especially given the sizeable funding secured for the broader PIDACC (Programme for Integrated Development and Adaptation to Climate Change) portfolio. The UK is concerned that the scale of the PIDACC approach may make synergies between workstrands difficult.
- The UK would welcome the opportunity to remain engaged in the funding proposal's full development to ensure that synergies are achieved (and duplication avoided) with other development actors in the partner countries. The UK will want to ensure that pathways for sustained impact are described, beyond the output level products noted in this proposal.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. Regarding the project's inclusion of "Development of basin wide climate risk management and early warning systems" as an output, we note that it may be useful to include environmental departments such as the Zambian Meteorological Department and the Disaster Mitigation and Management Unit (DMMU) as key stakeholders given their heavy involvement in designing climate change early warning systems.

17. Regional (Belize, Costa Rica, Dominican Republic, El Salvador, Guatemala, Honduras, Nicaragua, Panama). Improving the source to sea governance to reduce the impacts on the transboundary large marine ecosystems in the SICA region (GEF ID: 11520). Agency: FAO; GEF project financing: \$18,048,624; Co-financing: \$148,332,855.

✓ **Canada Comments**

- Suggest taking into consideration connectivity among protected and conserved areas (terrestrial, riparian, coastal and marine) within the scope of this project. It is also good to see a sustainable blue finance component, which can unlock additional funding opportunities and future work, e.g. for monitoring needs.

✓ **Germany Comments**

Germany approves the 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 recommends to identify the relevant national Ministries and Entities prior to the approval of this proposal as well as to agree with the countries on proposed pilot sites (PIF page 58).
- Germany welcomes the proposal's strong strategic planning focus, yet it seems to come at the expense of on-the-ground implementation. Germany therefore recommends strengthening the field components, leading to the implementation of specific measures, including nature-based solutions.
- Germany recommends a revision of the S2S approach to ensure the inclusion of coastal/marine ecosystems. Currently, the proposal seems to be primarily focused on watershed management and ecosystems, (e.g., Output 3.1.1 only targets watershed and not coastal-marine ecosystems).
- Germany recommends the project proponents to review the references to the SICA region, and ensure that all listed countries are properly included and referenced in the proposal (especially the Dominican Republic).
- Although the proposal identifies a set of key stakeholders, it does not seem to include crucial actors such as the Ministry of Finance. Especially in relation to Component 2 and Component 3, Germany recommends working with a broad network of relevant public and private finance actors to agree on blended instruments as well as partnerships, which can tap into different sources of capital for the envisioned solutions.
- Germany recommends using the terminology of natural infrastructure or nature-based solutions, rather than "technologies" – when referring to solutions coming from/with nature in Component 3.
- Germany recommends to look at opportunities to combine green-grey solutions as they hold great potential to include more commercially oriented financiers than into nature only projects/solutions.
- Germany recommends strengthening Component 4 through actions such as training of the trainers and the creation of partnerships with academia in each country to anchor capacity-building programs in local stakeholders.
- In terms of the climate relevant risks, we strongly encourage conducting climate risk assessments as part of the diagnostic and analysis to identify appropriate solutions. Currently, the proposal only mentions the risk posed to fieldwork. However, especially with NbS, climate change will affect effectiveness of potential solutions in the long-run.

✓ **United Kingdom Comments**

- The UK welcomes this project. The UK recommends that the full proposal describes how the project would work with the differing legal system structures across the region to develop public-private partnerships or consortium building and mechanisms to fund watershed development, such as water funds, Payment for Environmental Services regimes, water payment systems, among others, for possible scaling up as it is not covered in the proposal.

- While the overall project encompasses 8 countries with 8 watershed basins from Source to Sea, Output 3.2.2. is only applicable to 4 basins. There does not seem to be information on which 4 or reasons for reduction of scope are presented within the proposal.

MULTI-FOCAL AREA PROJECTS

18. Kazakhstan. Integrated Management of Seascapes of the Kazakhstani part of the Caspian Sea and Land Resources of Adjacent Territories (GEF ID: 11524). Agency: UNDP; GEF project financing: \$7,270,000; Co-financing: \$50,989,000.

✓ Germany Comments

Germany approves the 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 program proposal:

- The background provided by the baseline description is helpful. Nevertheless, Germany recommends that the project inception phase includes generation of reliable baseline data for biodiversity, (including overfishing, poaching and illegal fishing), carbon sequestration potential and invasive alien species, due to data availability issues. A reference to the implementation of the Aarhus Convention is also recommended.
- Germany recommends that the full proposal clearly explains the baseline applied and how the mitigation/sequestration effects of the project activities will be measured. The calculations presented in the proposal (p. 34) can be reviewed and adapted based on the baseline study results, since such calculations require extensive scientific field data and can only partly be taken from other regions. It remains unclear how maintaining a “moderate” degradation status of protected areas can contribute to CO2 sequestration.
- Germany recommends including measures to activate the nature protection effect of existing protected areas, such as the Northern Caspian Sea State Nature Reserved Zone, covering nearly half of the Kazakh part of the Caspian Sea.
- Component 3 (*Financial incentives/instruments for sustainable natural resource management, alternative nature-friendly livelihood activities and engagement of the private sector*) includes economic valuation of ecosystem services as a mechanism. The project would benefit from verifying the need for ecosystem services valuation and explaining the demand from the end users, as this method is resource consuming.
- The action to prevent further introduction of invasive alien species, such as the Sea Walnut (*Mnemiopsis leidyi*) and address existing threats at the international and national legal levels can be strengthened. Germany recommends conducting a respective feasibility study.
- Germany recommends examining possible synergies with a project which currently being designed by the World Bank and to be implemented in the same area (Blueing the Caspian Sea, GEF ID 11429).

✓ **Switzerland Comments**

- What is more exactly the potential number of direct and indirect beneficiaries of the Project in the country/region and how is the currently rather low number of 8'500 for direct beneficiaries derived
- Which are the experiences and lessons learned from past endeavours applying an integrated ecosystem-based approach in similar contexts and problem areas. Insights from comparably multi-faceted endeavours in their identification, deployment and monitoring would be a valuable addition to the Project Identification Form
- What are the reasons for focussing on SLM practices in the component 2 (pilot) while not addressing more specifically also water resources management aspects when speaking about an integrated management approach?
- What could be opportunities and challenges for bringing the achievements in Kazakhstan such as in policy, planning and management practices as well as financial incentives/instruments to other littoral states and for envisaging a transboundary component of the Project?

19. Bolivia. Support to the Productive Development Bank for the deployment of the Ecoefficiency Credit Programme in Bolivia (GEF ID: 11450). Agency: UNDP; GEF Project Financing: \$6,208,382; Co-financing: \$65,123,963.

✓ **Germany Comments**

Germany approves the 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 objective to accelerate the adoption of low emission and pollution technologies. However, the final proposal should place more emphasis on waste management by improving conditions in the recycling and recovery sector. Additionally, it should elaborate on concrete approaches to improve circular economy from previous projects, e.g. business models (sharing, leasing models) or chemical leasing (pesticide minimization).
- Germany appreciates the inclusion of micro, small and medium enterprises (MSME). The final proposal should elaborate more how MSME are targeted. A specific output target for MSME under output 1.2 could be considered. Furthermore, the proposal remains unclear, how social aspects are targeted.
- Germany would like to request that potential eco-efficiency measures such as longer durability and better repairability of machinery be taken into account in addition to LE/LP technologies.
- Germany would like to request the inclusion of measures for the tourism sector as it has been identified as target for LE/LP technology investments under paragraph 18.

- Germany suggests to include a component on cross-border exchange on best practices and cooperation with scientific bodies on capacity development.
- Bolivia has had several high level corruption cases in the last years and most investigations have progressed only very slowly (see [here](#)). Due to the limited control and monitoring of compliance in hazardous waste management, corruption risks in the management of POPs and WEEE are high. Germany recommends to carefully analyze beneficial owners of private sector beneficiaries of the project, to rule out conflicts of interest of politically exposed persons and actors to be known for corrupt waste management. The establishment of a national complaint/grievance mechanism should be considered.

✓ **United Kingdom Comments**

- The UK welcomes this project. The UK has been impressed with the in-house capacities and highly motivated team that works at BDP. The institution can act as a first mover to put sustainability and green growth at the centre of Bolivian development and global capital flows to the Bolivian economy. For the same reason, BDP was the first to issue a green bond in the Bolivian sustainable debt market last year.
- UK wishes to flag a potential issue related to the investment lines in agriculture and livestock, based on the UK's experience with UNDP as an implementing partner. One of the underlying factors the UK has identified are the massive financial flows directed at the agribusiness sector through the Bolivian credit market with virtually no ESG or deforestation exclusion criteria. This creates a powerful financial incentive for land use change from forests to agriculture. In that context, a green/sustainable loan intended to facilitate access to more energy-efficient agricultural machinery could inadvertently add to the package of highly attractive financing mechanisms available to the sector, contributing to further deforestation.
- However, given UNDP are important partners in the forests agenda, this project could provide a unique opportunity to raise awareness in BDP about the link between financing of agribusiness and deforestation and incorporate due diligence requirements around illegal/non-authorized deforestation, which we are interested in engaging BDP on in any case.

20. Regional (Azerbaijan, Kazakhstan, Turkmenistan). Blueing the Caspian Sea (GEF ID: 11429).

Agency: World Bank; GEF Project Financing: \$ 11,743,120; Co-financing: \$53,000,000.

✓ **Canada Comments**

- Has the project taken into consideration migratory species given that the region provides a critical habitat for many threatened migratory birds?
- We are curious why this project aims to create/improve 50,000 ha of terrestrial protected areas and only 10,000 ha of marine protected areas (which is less than 1% of the Caspian Sea surface area that is under the jurisdiction of participating countries).

- The project could be further strengthened if it takes into consideration ecological connectivity and resilience to climate change impacts as part of the cross-border cooperation.

✓ **Germany Comments**

Germany approves the 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 suggests making the objectives more precise and potentially more ambitious than the current focus on capacity development and workshops, leveraging the transboundary nature of the project. While the problems facing the Caspian Sea are described concisely, the Theory of Change and the objectives themselves remain rather vague. It does not become clear how the proposed activities will address existing barriers. For example, the project description states that implementation of the Tehran Convention will be supported, but it remains unclear how this will be achieved.
- Similarly, the description of how stakeholder involvement will take place is not very detailed, especially in the case of gender equality and private sector involvement. Germany recommends working with a broad network of relevant local stakeholders right from the start, not only government, but also civil society and the private sector to achieve a more balanced and possibly more sustainable project. This should be reflected in the activities and be described further in the project description.
- With regards to marine pollution, Germany recommends looking more into a source-to-sea approach to prepare objectives and activities.
- Lastly, another project is currently being designed by UNEP in the same area (Integrated Management of Seascapes of the Kazakhstani part of the Caspian Sea and Land Resources of Adjacent Territories, Project ID = 11524). Germany recommends looking into possible synergies between the two projects.

✓ **Switzerland Comments**

- What is more exactly the potential number of direct and indirect beneficiaries of the Project in the country/region and how is the currently rather low number of 8'500 for direct beneficiaries derived
- Which are the experiences and lessons learned from past endeavours applying an integrated ecosystem-based approach in similar contexts and problem areas. Insights from comparably multi-faceted endeavours in their identification, deployment and monitoring would be a valuable addition to the Project Identification Form
- What are the reasons for focussing on SLM practices in the component 2 (pilot) while not addressing more specifically also water resources management aspects when speaking about an integrated management approach?

- What could be opportunities and challenges for bringing the achievements in Kazakhstan such as in policy, planning and management practices as well as financial incentives/instruments to other littoral states and for envisaging a transboundary component of the Project?

21. Somalia. Conserving terrestrial and marine biodiversity and restoring ecosystem services in globally relevant and vulnerable sites in Somalia (GEF ID: 11414). Agency: UNDP; GEF Project Financing: \$12,448,395; Co-financing: \$6,500,000.

✓ **Canada Comments**

- The project might want to consider Other Effective Area Based Conservation Measures as the path to recognize and improve conservation and management measures where agencies, partners and communities already engage in sustainable activities that also generate long-term biodiversity conservation benefits effectively.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- Germany welcomes the project's participatory and gender-sensitive approach and emphasizes the need for constant civil society participation across all project stages. Participation strengthens social accountability mechanisms and is thus a powerful tool against corruption.
- Germany further recommends keeping a focus on community-led management, to ensure ownership and long-term uptake and continuation of conservation of terrestrial, coastal and marine areas.
- Germany welcomes the consultations with NGOs and IP&LCs but would like to see more planned engagement throughout the project including in planned activities. Further, it recommends to plan sufficient time and a variety of engagement formats to structure this process and inclusive as possible.
- Considering the capacity gap of Somalia's governance institutions to implement effective measures for environmental protection, a high level of public sector corruption in the country and the overall fragile context, Germany recommends assessing corruption risks and specific mitigation measures in the project risk section. Germany recommends including anti-corruption as a module into the capacity-building program for the MOECC and its state-level counterparts.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We note that while the project includes bottom-up approaches and community involvement to establish a robust regulatory framework, we would like to better understand plans to lay the groundwork for cooperative processes in advance of this step.

22. Yemen. Integrated Conservation and Sustainable Development in Socotra Archipelago and Aden Wetlands, Yemen (GEF ID 11408). Agency: UNEP; GEF Project Financing: \$4,416,211; Co-financing: \$5,000,000.

✓ **Germany Comments**

Germany approves the 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 would like to request that the full proposal adds further details on the (economic) valuation of the Aden wetlands as indicated under output 2.1.2 and that resulting data from the valuation is included in other project processes, including the estimate of cost-effectiveness of interventions (2.1.5) as well as outreach and awareness activities (3.1.1 and 3.1.4).
- Germany recommends that further elaboration is provided on the activities of the UAE on Socotra Archipelago (under *Project Description* as well as under *Risks to Project Preparation and Implementation*) and how their current role will be taken into account when implementing the planned activities on the archipelago.
- The project covers a wide range of project activities in its components and different groups of stakeholders, where coordination mechanisms will be crucial for the achievement of the overall project objectives and its success. Germany suggests that the full proposal identifies areas of coordination between the project components and stakeholders involved.
- While Germany welcomes the project's participatory, community-based and gender-sensitive approach, we emphasize the need for constant community participation across all project stages. Participation strengthens social accountability mechanisms and is thus a powerful tool against corruption.
- Germany recommends that corruption risks and mitigation measures are considered in the project risk section due to the widespread endemic corruption in Yemen, which affects both state institutions and the private sector. Considering previously occurred corruption issues during the implementation of international organizations-funded projects in the Ministry of Water and Environment (MWE), the limited freedom of press, the UAE's involvement in the area, alleged smuggling of the Socotra Island's endemic dragon tree, parallel governance structures and the decrease of the state's resilience to corruption, as well as Yemen's low rank of 176 out of 180 countries in the 2023 Corruption Perception Index (CPI), Germany recommends including anti-corruption as a module into the capacity-building in all project-related activities.

✓ **United Kingdom Comments**

- The UK welcomes this project.
- The RSCN (Jordan Royal Society for the Conservation of Nature) is a well-known non-governmental organisation that is considered a reference entity for nature protection and

protected area management in Jordan. It is overseeing Azraq Wetland in Jordan that has strong eco-tourism and local community development pillars. RSCN has worked in Yemen before and enjoys good regional (including GCC) relationships that cover training and capacity building for protected areas establishment and management.

- The UK recommends that the role of the private sector is elaborated and specified, especially in light of investments put forward (by the UAE) for infrastructure, security and tourism. Such investments would carry significant implications on nature and would require special handling by the project.

23. Bosnia-Herzegovina. Introducing Nature Based Solutions to Ensure Resilient Ecosystems, Green Recovery and Sustainable Livelihoods (GEF ID 11335). Agency: FAO, UNDP; GEF Project Financing: \$4,834,530; Co-financing: \$40,150,000.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- The holistic approach combining environmental assessment, sustainable land management practices and integrated spatial planning and capacity building measures is promising. Germany suggests clarifying how this approach is fully addressed and implemented.
- To realize the full potential of this project proposal, Germany recommends:
 - strengthening the rather vague description of key stakeholders at the community level as well as private sector actors (particularly considering their important role in planned PPP and blended finance measures);
 - including a long-term strategy to secure investments at landscape level beyond program duration,
 - describing how local actors' conflicting interests and priorities will be reconciled during planning and implementation of land management processes. Such a compromise is necessary to ensure that the local population takes ownership of the land management plans (e.g. elaborating how integrated land management plans will generate additional economic benefit and thus ensure ownership and uptake among local population);
 - describing indicators considering the three LDN indicators, how to measure improved protected area management, difference between land "under restoration" and with "improved practices".

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We note that a key project focus is on management and protection of forests, and primary implementing partners are entity ministries. In Bosnia and Herzegovina, forests are owned by the state (national) government, not the entity governments. Entity governments may have a role in

some forest management, but that is not legally certain as there is no forest management law in the Federation of Bosnia and Herzegovina. We would welcome additions to the project that affirm state-ownership of forests and ensuring project activities do not inadvertently undermine Bosnia and Herzegovina state sovereignty.

- BiH has the lowest percentage of lands protected at the national level in Europe. A focus on OECMs, rather than lands or waters protected at the national level, could further discredit the existing protections and responsible ministries. We recommended greater attention on durable solutions backed by long-term commitments at the national level.

24. Ecuador. Integrated landscape management in the Napo River Basin for sustainable land management and biodiversity conservation. (GEF ID 11333). Agency: UNDP; GEF Project Financing: \$8,982,420; Co-financing: \$51,641,021.

✓ **Germany Comments**

Germany approves the 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 Germany welcomes the bottom-up and the integrated and sustainable landscape approach of the project design, Germany would like to request that the full proposal identifies Nature-based Solutions (NbS), especially within component 2: “Adoption of practices that contribute to comprehensive landscape management for sustainable land management and biodiversity conservation”. It should be highlighted that NbS address climate change concerns through the multiple services provided by ecosystems in term of adaptation (water management, flood risk reduction, adaptation to disaster risks, support to livelihoods resilience) and mitigation (carbon storage). Currently, NbS are only mentioned in relation to mitigation on p. 40.
- Germany proposes not only adopting a gender-sensitive approach, but also a generationally sensitive approach to inspire youth to explore opportunities within their rural communities. Despite its lower urbanization rate compared to neighboring nations, Ecuador has seen a consistent rise in rural-to-urban youth migration. This trend is primarily attributed to environmental degradation, community conflicts, and rural areas' lack of educational and employment prospects.
- Germany recommends the inclusion of corruption risk assessments and the development of mitigating measures in the project designs at country level, with local civil society stakeholders playing a role in planning and monitoring. Germany also recommends including measures for transparency and anti-corruption risk mitigation into planned local regulatory mechanisms to strengthen the management of land use and occupation.
- Germany emphasizes the need for constant community participation, including actors from anti-corruption civil society organizations, across all project stages.

✓ **United Kingdom Comments**

- The UK welcomes this project. It has the potential to complement advancements that UNDP has done in the framework of ProAmazonía, Results Based Payment Project, and with UK contribution through Climate Promise, among others.
- The UK recommends that the full proposal defines a mechanism to track the results of this project's interventions. In such a way that the actions demonstrate additionality and not duplication of wider efforts or reporting.
- The UK suggests the addition of “other donors” and to do an initiative mapping to understand synergies with ongoing projects. For example, the Amazon Multidonor Trust Fund (AMDTF)´s *Bioeconomy strategy for Napo Pastaza and Morona Santiago*.
- This proposal should also take the lessons learned from REDD for Early Movers (REM Ecuador) and this should also be detailed in the relevant cooperation initiatives section. This, because the project has a REDD+ focus.
- There are some components that do not seem to have associated outcome indicators.
- Ecuador's Gender and Climate Change Action Plan should be considered as a framework.
- Strengthening the land management of Napo province is of outmost relevance as it is one of the biggest (if not the biggest) hotspots of illegal mining. The project will benefit the environmental protection and social development of the territory that could help mitigate this issue. Given this, the UK recommends that this point is highlighted in the full proposal.
- The UK notes our understanding that the economic growth of the country is expected to be around 0%, this differs from the economic analysis on page 35.
- More up-to-date deforestation data is available through the Ministry's official channels.
- Lastly, on page 44, the UK is mentioned as a consulted stakeholder for the project. Although the UK shared time in fieldwork during those dates, UNDP did not perform a formal consultation process with the UK.

✓ **United States Comments**

- All biodiversity is important for nature conservation. There is not an internationally recognized definition for megadiversity and thus it should not be included as a rationale for receiving GEF funding.

25. Algeria. Restoration and forest management of the Algerian pine forest with an integrated participatory approach promoting the Aleppo pine, NWFPs and ecosystem-based adaptation solutions to climate change (GEF ID 11179). Agency: UNDP; GEF Project Financing: \$ 3,502,968; Co-financing: \$ 24,000,000.

✓ **Germany Comments**

Germany approves the 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 program proposal:

- Since the proposal declares an inclusive, gender-responsive and participatory forest conservation, sustainable management and restoration approach, Germany recommends to have additional focus/emphasis on Youth as well (see page 5/48, Outcome 1).
- As outlined in the methodological approach (page 30/48), the restoration activities are described as a combination of assisted natural regeneration, enrichment planting, and the establishment of agroforestry systems, tailored to the specific needs and conditions of the target areas. However, there are more intervention types of Forest Landscape Restoration (FLR), which have been defined by the World Conservation Union (IUCN). For instance Silviculture, Improved fallow as well as Watershed protection and Soil erosion control are important intervention types and might be considered here as well, given the project area with the described severe water and wind erosion problems.
- Germany asks for a more comprehensive explanation of the way in which IP&LCs are integrated in the proposal.
- Since the project is aligned with the Global Biodiversity Framework regarding Target 10, the proposal foresees also interventions with a cross-sector approach, especially the nexus between forestry and agriculture (agroforestry) and forestry and watershed protection (water nexus). Germany recommends emphasising this more strongly.
- Germany supports the *African Forest Landscape Restoration Initiative AFR100* throughout 34 countries in Africa. Although Algeria is not a partner country of the AFR100 yet, the methodological approach as well as the foreseen piloting of innovative financing solutions to attract private Investment (Page 4/48) is fully in line with the German support to the AFR100. A reference to this Initiative and facilitation of the technical exchange on FLR could be made in the final project proposal.