France Comments on the work program - November 2012 GEF council

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Biodiversity

1- Development of a National Network of Terrestrial and Marine Protected Areas Representative of the Comoros Unique Natural Heritage and Co managed With Local Village Communities - Comoros (GEF 5062)

The project aims to expanded Union of Comoros' PA system through the addition of varied terrestrial, coastal and marine ecosystems, reaching coverage of 22% of the land surface and a marine area to be estimated, but larger than 42,000 ha.

Fostering Union of Comoros' PA system is needed and the rationale of the project is well documented and explained. The problem is that assumptions of the project's feasibility are unrealistic if one looks at the experience of the last 10 years.

The PIF doesn't really build on the experience of the previous GEF-UNDP project "Conservation of biodiversity and sustainable development in the Federal Islamic Republic of the Comoros" (implemented between 1997 and 2002)[1]. Since the creation in 2001 of the "Parc Marin de Mohéli (PMM)" thanks to GEF support, this park went through almost collapse if the local Ulanga didn't tried their best to save what they could with almost no local resources, and through small assistance from several NGOs and donors.

The assumption about the capacity to operate and maintain a far larger system in the Comoros seems unrealistic:

- The Government was not able to increase budget support to the Park Marin de Mohéli, there is no incentive for the government to increase this amount. At the minimum, such project toward the expansion of the PA system should be based on some proof of improved capacity of management and financing of the existing system which is absolutely not the case in the last 10 years.
- The development of tourism in Comoros is not a realistic option to finance a PA system (cf. §22 p 9) and the past years demonstrated that the few backpackers who reach the PMM where not enough and the basic infrastructure and services to bring them to the PMM (irregularity of transport and access infrastructures, lack of information, booking and contact facility, etc) aren't there to create a sufficient flow of visitors and incomes to finance the PMM. At the minimum the PIF should publish and build its strategy on the Tourism statistics and particularly the Tourist entries record at the PMM. This would then bring some relativity to the baseline and the way forward.
- The basic services and infrastructure (water distribution, energy, fisheries licences management or other) are not in place to be able to implement innovative financing solution like Payment for Ecosystem Services.
- The proposed "Risk management strategy" on the financial sustainability issue[2] (a "plan to maintain a financial flow") does not seem very credible, and past 10 years experience proved to be insufficient to even maintain just the PMM.

One of the few potentially viable options would be to establish an independent conservation trust fund with a perpetuity endowment to secure the basic operating needs of PA in the

[1] The PIF is fair and objective enough to mention the existence of some evaluations of the PMM shortcomings experience (cf. note 23 at the end of page 9, J.BRAND 2007 evaluation was financed on FFEM/WWF funding), but it doesn't present the results of those evaluations.

[2] Item n° 3 of the TABLE in B.3. page 13 : "The project will establish an enabling framework for the government, donors, NGOs and the private sector to invest according to a focused and coherent plan to maintain a financial flow that will ensure the viability of the PA system beyond the lifetime of the project (Output 1.4)"

country to avoid collapse of investments and give time to development other sources of funding on later stage on the basic but truly operated PA system.

In conclusion, this project is urgently needed, but need to be built on realistic option to establish the financial sustainability of the proposed investments.

If this is not the case, this project will only contribute to the increase of paper parks in the Union of Comoros, with no real management capacity due to the lack of a realistic long term financing strategy of the PA system.

Opinion: the project needs to be completely redesigned. Moreover, in order to harmonize donors biodiversity protection activities in the country, discussions with the Agence française de développement (AFD) are recommended.

2- Democratic Republic of Congo Conservation Trust Fund - Congo DR (GEF 4640)

The project will try to try enhance the management effectiveness of Democratic Republic of Congo's protected area system.

We support the initiative and particularly the project objective and rationale.
The project is well designed and at the difference of the previous project in Comoros, it is build on a balanced approach: (i) a conservation trust fund to secure the long term financing in a country where budget, tourism and other traditional source of funding for biodiversity will take many years to increase, and (ii) a comprehensive and realistic investment to improve the tools and capacity of PA management in RDC.

Opinion: favourable.

International Waters

3- Reducing Pollution and Rebuilding Degraded Marine Resources in the East Asian Seas through Implementation of Intergovernmental Agreements and Catalyzed Investments (GEF 4936)

The goal of this programme is to rebuild and sustain coastal and ocean ecosystem services across the East Asian Seas (EAS) region through the scaling up of partnerships, capacities and investments at the regional, country and local levels. The general approach is to address the urgent threats to the environment and human well-being and to remove barriers to building a sustainable ocean-based green economy in the EAS.

As there is a need to establish a regionally and nationally recognized depository of environmental information and knowledge coming from past and ongoing assessments of LMEs of the East Asia region, the implementation of component 3 “Knowledge platforms for building a sustainable ocean-based green economy” should unable local actors including ICM committee to access relevant information and best practices developed at regional level.

Opinion: favourable.

4- Enabling Transboundary Cooperation and Integrated Water Resources Management in the Extended Drin River Basin (Albania, Montenegro, Macedonia) (GEF 4483)

The global benefits to be accrued through the project consist essentially in increased levels of multi-country cooperation in the management of the shared Drin basin, increased water security, and the balancing of conflicting water uses.

Considering that the project countries have pursued the management of the shared water bodies from a predominantly national perspective, we share STAP recommendation that an institutional analysis should be conducted that takes a long term perspective into account, considering the EU integration process, in order to determine whether there are different institutional models that may be more attractive from a sustainability perspective.

Opinion: favourable.

Persistent organic pollutants

5- Pesticide Risk Reduction in Malawi (GEF 5109)

The project will contribute to the management, prevention and disposal of POPs pesticides waste and the management of contaminated sites in an environmentally sound manner in Malawi.

The project will implement the following activities:

- Safe disposal of POPs and other obsolete pesticides and remediation of pesticides contaminated soils
- Strengthening life-cycle management
- Promoting alternatives to chemical pesticides.

Although the document recognises the role of women and the necessity to target certain activities on women, **we would like to underline the importance of a good baseline study**. **It must clearly identify local practices and their underlying motivations as well as factors that might motivate change**.

Opinion: favourable, subject to above comments.

6- Continuing Regional Support for the POPs Global Monitoring Plan under the Stockholm Convention in the Africa Region (GEF 4886)

This project focuses on strengthening capacity for implementation of the revised Global Monitoring Plan in the Africa region and creating the conditions for sustainability of the networks, acting as a follow up to the first phase of the support to laboratories to enhance their skills and capacity to detect and monitor POPs in the environment.

It is based on the results from the GEF GMP project (2009-2012), which focused on the 12 original POPs. This new project will include the new POPs added during COP-4 and COP-5. It will also continue the training of staff in participating laboratories and strengthening the performance of sampling and analysis that will enable the national laboratories to improve their ability to analyse POPs according to international standards.

As mentioned by STAP, **what is missing in the project is how conditions for sustainability of networks can be improved**. Any government lab will require buy-in from decision-makers to understand the importance of the work being done, and how it can feed into national issues of development, human and environmental health.

Opinion: project modification recommended in line with above comments.

Climate Change

7- Energy Efficient Production and Utilization of Charcoal through Innovative Technologies and Private Sector Involvement - Sierra Leone (GEF 4904)

The proposed strategy is relevant, particularly as it seeks to involve both public and private sectors and targets both woodfuel production and consumption, along the whole value chain. We appreciate the attention paid to the involvement and awareness raising to a broad range of stakeholders. However, the success of such a program lies in the details and some would need clarification.

Generally:
In the co-financing table, the private companies shall be distinguished, between the CSR contributions of transnational firms (Addax for instance) and contributions from producers of charcoal and ICS as SMEs.
There is no mention of quality monitoring as part of the standard and certification scheme. This is a complex and costly process, which shall be sustained after project completion, especially with artisanal production.
We believe there is an over-reliance on carbon finance to ensure viability of the various systems to be developed (p. 15 and deliverable 2.2 p.12), while at the same time projects supported by GEF cannot access carbon finance during project duration, but only after funding ends.
Transboundary trade is not mentioned in the baseline or risk matrix. It should be assessed and monitored, as border porosity will add up to an informal sector in charcoal production, to possibly weaken efforts undertaken by the government and implementing agencies to set-up and enforce an adequate regulatory framework.

On charcoal:
The baseline figures presented contradict with the information provided in Annex. Indeed, if 14% of 1 million CS use charcoal, there are 140,000 charcoal stoves in use (p.5). If 1 stove uses 400kg of charcoal per year (footnote 15, p.21), total national yearly demand is 0.4 * 140,000 = 56,000 T per year. Then the figures of 400 T produced yearly by 500 charcoal burners (p.5) are gravely underestimated.
The charcoal technology of choice, Adam retort is a proprietary technology and not open source. It is probably not an issue, but worth mentioning. Other alternative technologies might as well be explored.

On ICS:
No diagnosis of the existing ICS value chain has been undertaken prior to writing the project document, as there is no mention of existing ICS initiatives (at least one existing, the Njai Wonder Stove, with a technology similar to Toyola) or technologies considered for development.
The ICS component is very light, targeting the dissemination of 15.000 units over 4 years, to be compared to 1 million traditional stoves in use. This is not likely to represent a significant market share and to ensure the sustainability of the ICS value chain. In general, the strategy for ICS needs to be detailed further. Indeed, while the title of the project mentions only charcoal, we understand that at least some ICS disseminated will be able to accommodate woodfuel.
We are confused by the deliverable 2.7 “Established and operational framework of the phase-out of traditional cookstoves”, especially if the project ambitions phasing-out rural free 3-stones stoves powered with largely free firewood, still used by 85% of the Sierra Leonean households. The project should set itself more achievable targets and focus only, in a first phase at least, on phasing-out inefficient charcoal stoves.

In conclusion, on ICS :

1. **we strongly suggest that the program works on its relationship with the Global Alliance for CC and ECREE(Center for Renewable Energies and Energetic**

Efficiency), which will act as a main implementer for ECOWAS renewable energy policies and will channel funds to project implementers ;

2. **Experience shows that effective stove markets rarely emerge spontaneously. They may initially need direct subsidies to reduce the retail price of stoves. They may furthermore need indirect subsidies to support market development interventions such as training, development of standards, awareness raising, research and development, monitoring and evaluation. The program will have to be vigilant in use of subsidies. The program will have to ensure that subsidies are used to create markets and not undermine them ;**
3. **It is important to identify and build on the successful institutional arrangements created by existing national and local partners and other agencies working in the same area. According to the Paris Declaration on Aid Effectiveness, the program will have to commit to harmonize their cookstove policies with other actions at the country and regional level and align their activities. The program will have to identify previous and existing stove interventions before trying to build on and improve them ;**
4. **Much of the risk associated with stove business models is the unreliability of performance and cost data faced by investors in both the public and private sectors. The program will have to put in place thorough and transparent monitoring systems, and provide independent evaluations of their activities.**

Opinion: favourable but the design of the ICs component will have to take into account the above comments./.