



CELEBRATING TWENTY YEARS

GLOBAL ENVIRONMENT FACILITY

INVESTING IN OUR PLANET

COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE WORK PROGRAM
APPROVED BY COUNCIL IN
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NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the Work Program approved by the Council in November 2012.

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BIOLOGICAL DIVERSITY

1. Comoros - UNDP: 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 - GEF ID = 5062

✓ France's Comments

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) . 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 were 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 licenses 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 (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 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.

✓ **Germany’s Comments**

Germany agrees with the STAP in that the PIF is well presented, clear, logically framed and achievable, and that the baseline is well defined and described, including citation of key scientific results and the description of existing barriers to realization of project objectives and steps to remove these. Suggestions for improvements to be made during the drafting of the final project document:

- The new protected areas (PAs) to be established seem to fall under two distinct governance types: co-managed national PAs (shared governance) and community reserves (governance by local communities) (see current IUCN Guidelines for Applying Protected Area Management Categories, <http://data.iucn.org/dbtw-wpd/edocs/paps-016.pdf>). Under Component 1, the revision of the legal framework and institutional structures should therefore take into account these two possible types of governance (and others, if applicable).
- Moreover, under Component 2, management/governance arrangements for the co-managed PAs are well described, but no mention is made on how these will differ in the case of the community reserves. Presumably provisions for the community reserves would include stronger decision-making and land/resource rights for the local communities.

- Concerning the co-management approach in the national PAs, it is mentioned that there are several shortcomings in the current approach – it should be mentioned how these will be addressed through the project.

✓ **USA's Comments**

- The United States recognizes the importance of conserving the exceptional marine and terrestrial biodiversity of the Comoros Islands and the outstanding potential that the Comoros Islands have to become a first class eco-tourism destination. Consequently, the United States supports efforts to protect the country's unique natural heritage. That said, we do have concerns about the very ambitious scope of this project, both in terms of the financial scale of the project relative to the Comoros GDP, the current viability of tourism, as well as the capacity of the GOC to implement this ambitious project. Specifically, we would like to know what steps have been taken by the project implementers to assure that a supportive business environment is in place to ensure that the “plan/strategy for developing high-end eco-tourism activities in PAs/MPAs” outlined in Output 2.3, is in fact realistic.
- Furthermore, while we recognize the potential synergy between new protected areas and increased tourism in the Comoros, as the PIF notes, the Comoros face significant challenges in fostering a viable tourism industry. We would like to know how the project implementers envision the growth of this industry given the current limitations of tourism-related infrastructure and lack of business incentives to expand it, as well as the relative lack of safe air or sea inter-island transportation options.

2. DR Congo - IBRD: Democratic Republic of Congo Conservation Trust Fund- GEF ID = 4640

✓ **Canada's Comments**

- The Project Information Form (PIF) identified two risks: a lack of capacity in the governance structure; and, a poorly designed investment strategy. These must be mitigated to ensure the success of the project. In our view, the PIF currently does not sufficiently address the mitigation measures and we request that the mitigation measures to be fully addressed before CEO approval of the project.

✓ **France's Comments**

- 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.

✓ **Germany's Comments**

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

- The final project proposal should include a clear rationale for the splitting of funding between the different funding windows of the proposed Conservation Trust Fund (CTF) based on an analysis of financial needs and comparative advantages of the respective funding windows. We also recommend including realistic scenarios for estimating real returns of CTF assets including transactions costs in this analysis, taking into account the current situation on international capital markets.

3. South Africa - UNDP: Mainstreaming Biodiversity into Land Use Regulation and Management at the Municipal Scale - GEF ID = 5058

✓ **Germany's Comments**

Germany welcomes very much the foresighted and proactive multi-level approach that South Africa is undertaking in order to integrate and mainstream biodiversity in economic valuation and production schemes, particularly within Project Component 2 “Conservation and Sustainable use of Biodiversity on private and communal Land.

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

- We would like to recommend that in order to create the attained “Incentives: New business opportunities and market access”, specifically with regard to new biodiversity-based supply chains, which often might be based on genetic resources, the project should also take the promotion of Access and Benefit-sharing (ABS) mechanisms duly into consideration;

- Particularly for local communities, which are often holding (only) utilization rights on different land tenure schemes as well as traditional knowledge on the use of biodiversity components, ABS can offer a long term potential for an improvement of their livelihoods while fostering biodiversity conservation. Both components of the project could largely benefit from integrating awareness raising on ABS and clarifying the role of key stakeholders such as federal/ provincial authorities, private land owners, local communities, traditional healers, etc. in the process of granting prior informed consent (PIC) and establishing mutual agreed terms (MAT). Such activities – including the establishment of bicultural community protocols - could at the same time serve as national pilot measures for promoting and implementing the Nagoya Protocol on ABS.

4. St. Kitts and Nevis - UNDP Conserving Biodiversity and Reducing Habitat Degradation in Protected Areas and their Buffer Zones - GEF ID = 5078

- *There were no comments provided for this project.*

5. Swaziland - UNDP: Strengthening the National Protected Areas System of Swaziland - GEF ID = 5065

✓ **Germany's Comments**

Germany requests that the following points be taken into account during the drafting of the final project document:

- The analysis of the situation of PA's is clear and valid. The proposed program is however fairly ambitious in terms of the timeframe required to face and deal with the different challenges. On the one hand, there is a considerable need to improve financial returns; on the other hand, the distribution of the added-value has to be looked into specifically. The project can either decide to increase the self-financing capacities of the different PA's (old and new) through additional funds, or distribute a good share to the local population through employment or other income generating activities. Also, the private sector will most likely insist on its share or benefits;
- From our perspective, in this context, the crucial element and procedures in the project are the respective business plans. They are the foundation of an equal sharing of benefits and revenues;

- The strategy to support and improve existing PA's under governmental, private or local governmental management is the correct and most promising way. The need for creating new PA's is certainly justified (protection of biodiversity, ecosystems and ecosystem services). However, this process must be accompanied by a number of dialogues to balance the interests of the different stakeholders involved. An improved, better governed existing ("old") PA can e.g. be used as example and good practice and is more likely to trigger interest in expanding the PA system than following an approach to focus on designating new areas from scratch.

✓ *USA's Comments*

- The United States applauds the objectives of this proposed project to strengthen Swaziland's system of National Protected Areas. We would like to share several comments and concerns with the intention of further improving the project. Firstly, we are concerned whether the GKOS will be able to fulfill the funding commitments indicated under the co-financing arrangement. We would also like to have greater assurance that the project will be able to build sufficient capacity in the Swaziland Nature Conservation Trust (SNTC) to ensure continued sustainability after the GEF project has concluded. We also suggest that, as the PAs are small in area, rather than working with SNTC, it might be more effective to focus on community and private reserve capacity building.
- Finally, we would like to have greater clarity about the role that the SNTC will play in implementing Component 1 New paradigm for PA management enables PA expansion and buffer threats removal through co-management and suggest that Component 2 may not be essential to the overall objectives of the project.

6. Tanzania – UNDP: Enhancing the Forest Nature Reserves Network for Biodiversity Conservation in Tanzania - GEF ID = 5034

✓ *Germany's Comments*

Germany requests that the following points be taken into account during the drafting of the final project document:

- The rationale of the project is well founded. Biodiversity, linked to tourism, is one of the most important economic factors in Tanzania. Forests play a key role in maintaining the rich biodiversity and provide the local population with a substantial number of different ecosystem goods and services. About 27% of the country's terrestrial area is protected in some form – the question of where limits lie is therefore of great importance, especially on the village level. The creation of more PA's, which

is clearly intended by the GEF project, has to be seen in this context. Success can only be achieved in a sustainable way if the central institutions, the decentralized local governments and the local population find ways and means to make a balanced choice between the interest of nature conservation and development based mainly on the long-term use of nature and services.

- In this context, the Tanzanian and the German Government have agreed to invest in the PA system (Serengeti and Selous) including the support in training and infrastructure in the surrounding communities. The focus lies on the assistance of the Ministry of Natural Resources and Tourism, as well as the assistance to the decentralized governments, including alternative income generation capacities in collaboration with the private sector. Even if there is no regional overlap with the GEF project, it is nevertheless very important to coordinate the strategic approaches within the different projects. As there is already a multitude of existing approaches and institutional set ups, we have to make sure not to overstretch local capacities and resources, and to establish clear and transparent communication lines and responsibilities for the involved stakeholders.

CLIMATE CHANGE

7. Brazil – IADB: Low-Carbon Urban Mobility for Large Cities - GEF ID = 4949

✓ Germany's Comments

Germany requests that the following points be taken into account during the drafting of the final project document:

- Component 1 of the project aims to establish a sustainable urban mobility framework through which climate change considerations shall be included in urban transport planning and investments. However, these considerations are limited to climate change mitigation and do not take into account the issue of adaptation to climate change. Most of Brazil's big cities are at the coast and therefore their infrastructure is highly vulnerable to e.g. storm surges and water-related calamities. Against this background, we request that the issue of climate-resilient transport infrastructure is integrated across the three components of the project, in particular under component 1 (mobility framework) and 3 (Capacity Building and dissemination). This would support synergies and co-benefits between low-carbon and climate-resilience goals.

8. China – UNDP: Enabling China to Prepare Its Third National Communication (3NC) and Biennial Update Report to the UNFCCC - GEF ID = 4882

✓ Canada's Comments

- Canada is pleased to see recent proposals from developing countries to fund the development of national communications as well as biennial update reports. These are important reporting products, which allow for transparency and accountability under the Convention.
- As countries are investing considerably in these reporting products, it is important that proposals to fund the preparation of biennial update reports and national communications demonstrate how these projects will build sustained institutional and technical capacity to undertake this reporting in a regularized way going forward. This is a key piece of information required by the GEF in order to assess the project proposals as well as their results.
- It takes time to establish the internal technical and institutional capacity to prepare these funding proposals, as well as to maintain and regularly update inventories, and preparing Biennial Update Reports (BURs) add a further reporting obligation for

developing countries. We must work together to ensure that developing countries have the tools they need to regularly prepare these reports going forward.

- The proposed timeline of 48 months does not appear to be consistent with UNFCCC timelines, requiring the first BURs by December 2014. Please adjust the timeline accordingly.
- The project should also ensure that it contributes to building long-term technical capacity and institutional strengthening in China.

✓ *USA's Comments*

- We were encouraged to see that aspects of this project focus on adaption and on a review of emissions inventory efforts in Hong Kong and Macao. The United States would like, however, to seek clarity on the timeframe for component 7 (support for preparation of the biennial report) to understand if funding will be made available early on in the project given the submission deadline for the biennial report is Dec 2014 and the timeframe for the full project is Dec 2016 (48 months). We also request that the timeframe of support for component 7 be shortened so that the submission of the biennial report can take place by December 2014.

9. Djibouti – IBRD: Geothermal Power Generation Program - GEF ID = 4626

✓ *Canada's Comments*

- Canada shares the concerns of the STAP, specifically that the project needs to provide a clearer definition of both the global environmental benefits it intends on generating and the incremental costs that the GEF will cover. Please clarify the benefits and incremental costs.
- The project document does not make a strong case for why GEF resources would be needed for this project. Please provide the necessary justification to inform to CEO's approval decision.

✓ *Germany's Comments*

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

- The PIF lacks information on the potential for negative environmental or social impacts through the drilling program, power plant construction and plant operation.

This potential should be assessed during further development of the project. In addition, appropriate measures to avoid or mitigate potential impacts that could occur as a result of geothermal energy development in Djibouti should be designed and included in the project.

- Germany supports the revisions which the STAP has requested.

10. Global – UNEP: Umbrella Programme for National Communication to the UNFCCC - GEF ID = 5119

✓ Canada's Comments

- Canada is pleased to see recent proposals from developing countries to fund the development of national communications as well as biennial update reports. These are important reporting products, which allow for transparency and accountability under the Convention.
- As countries are investing considerably in these reporting products, it is important that proposals to fund the preparation of biennial update reports and national communications demonstrate how these projects will build sustained institutional and technical capacity to undertake this reporting in a regularized way going forward. This is a key piece of information required by the GEF in order to assess the project proposals as well as their results.
- It takes time to establish the internal technical and institutional capacity to prepare these funding proposals, as well as to maintain and regularly update inventories, and preparing Biennial Update Reports (BURs) add a further reporting obligation for developing countries. We must work together to ensure that developing countries have the tools they need to regularly prepare these reports going forward.
- Please clarify on which number of National Communications each of the 12 countries is working.
- Please advise how the Implementing Agencies and the GEF Secretariat will address the fact that some countries have already received funding for their current National Communications, but have not yet submitted it.

✓ USA's Comments

- The United States strongly supports this proposed program to facilitate reporting to the UNFCCC

11. Global – UNDP/UNEP : Global Support Programme for Preparation of National Communications and Biennial Update Reports for non Annex I Parties under the UNFCCC - GEF ID = 5141

✓ Canada's Comments

- Canada is pleased to see recent proposals from developing countries to fund the development of national communications as well as biennial update reports. These are important reporting products, which allow for transparency and accountability under the Convention.
- As countries are investing considerably in these reporting products, it is important that proposals to fund the preparation of biennial update reports and national communications demonstrate how these projects will build sustained institutional and technical capacity to undertake this reporting in a regularized way going forward. This is a key piece of information required by the GEF in order to assess the project proposals as well as their results.
- It takes time to establish the internal technical and institutional capacity to prepare these funding proposals, as well as to maintain and regularly update inventories, and preparing Biennial Update Reports (BURs) add a further reporting obligation for developing countries. We must work together to ensure that developing countries have the tools they need to regularly prepare these reports going forward.
- Overall, this is a well-designed project and Canada supports its objectives, particularly with regard to strengthening the human, technical and institutional capacity of recipient countries to prepare inventories, BURs, and National Communications on a regular basis. It is important that developing countries establish and retain the internal technical and institutional capacity to undertake this reporting.
- In terms of the specific elements of the proposal, Canada has the following questions and comments:
 - The Project has a 5 year timeline, yet new National Communications are due by 2016 and BURs by 2014. Please explain.
 - The coordination section of the proposal does not mention efforts to coordinate with the UNFCCC Consultative Group of Experts National Communications from Parties not included in Annex I to the Convention (CGE). Although the revised terms and mandate of this body post-2012 are not yet determined, it is likely that the CGE will continue to provide training and support to developing countries to prepare their National Communications and BURs and, as such, it would be

important that this project seek to coordinate with the CGE's activities.

- The proposal indicates that this project will be open to all non-Annex I countries, but it also states that assistance will be prioritized for countries with the least technical capacity, particularly LDCs and SIDS. Please clarify how many countries this project will serve and how their eligibility will be determined.
- In addition, if this project targets LDCs and SIDS, there may be overlap between it and the "Umbrella Programme for National Communications to the UNFCCC" (UNEP), which is also seeking funding. Please explain the distinction between these projects.
- It is our understanding that many developing countries – in addition to LDCs and SIDS – require assistance to develop their technical and institutional capacity to develop BURs, and National Communications, and that all developing countries would benefit considerably from this project as well as from the south-south learning that wide participation would enable. In our view, it is important that as many countries as possible are served by this programme. Given that LDCs and SIDS have been invited to provide BURs at their own discretion, larger developing countries should be assisted with this additional reporting obligation through this project as they will need to submit these reports within a short timeframe.

✓ *Germany's Comments*

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

- The proposed program is follow-on to the National Communication Support Program (NCSP) that will end in December 2012 and that has provided technical support to NA1 countries for producing national communications. The proposed program also supports NA1 countries in elaborating the biennial update reports.
- Germany suggests for the drafting of the final project document to make clear which countries shall benefit from the project a) with regard to the production of national communication and b) with regard to the elaboration of the biennial update reports. In the field of national communications only those countries shall benefit from the proposed program, which have not received support under the first program.
- Furthermore, Germany underlines the importance of a close cooperation between the proposed program and the Consultative Group of Experts (CGE) to make sure that the activities complement each other.

✓ *USA's Comments*

- The United States strongly supports this proposed program to facilitate reporting to the UNFCCC.

12. Iraq - UNDP: Catalyzing the Use of Solar Photovoltaic Energy - GEF ID = 5063

✓ *Canada's Comments*

- Canada shares the STAP's concerns regarding the cost-effectiveness of solar photovoltaic energy in Iraq. Please provide the necessary analysis to inform the CEO's approval decision.

✓ *Germany's Comments*

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

- Germany sees a need for further elaboration of the economic viability of the solar technologies in comparison to other technologies with comparable level of service as examined by the cited previous studies in Iraq. This should include a risk assessment of shifts in financing terms (interest rates) that especially affect long-term financing activities like solar technologies. Further, regarding the evaluation of the emission reduction potential by solar technologies it is good practice to also include production related emissions into the overall emission reduction assessment (life-cycle assessment). Clarification is sought if these emissions are included or not. For allowing the evaluation of the requested GEF finance, it is necessary that the implementing entity provides a clearer quantification of the extent of measures in the final project document (e.g. number of trainings, dissemination sessions and addressed persons/ institutions).

13. Macedonia - UNIDO: Catalyzing Market Transformation for Industrial Energy Efficiency and Accelerate Investments in Best Available Practices and Technologies in the Former Yugoslav Republic of Macedonia - GEF ID = 4902

✓ *Germany's Comments*

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

- The proposed project follows a comprehensive approach without leaving out important parts. However, it remains unclear which sectors and enterprises will be selected for implementation. Likewise, it should be clarified which selection criteria will be used to identify the most relevant sectors and enterprises to achieve the project's objectives. This is especially relevant for components 2 and 3 (selection of pilot enterprises and lighthouse projects, respectively).
- There seem to be some deeper thoughts already on the selection of enterprises and the scope of the GHG mitigation approach as the text provides detailed estimations on GHG mitigation under the heading "Global Environmental Benefits". These background calculations are not yet made transparent. Please provide more information thereon.

14. Mexico - UNDP: Sixth National Communication to the UNFCCC - GEF ID = 5140

✓ *Canada's Comments*

- Canada is pleased to see recent proposals from developing countries to fund the development of national communications as well as biennial update reports. These are important reporting products, which allow for transparency and accountability under the Convention.
- As countries are investing considerably in these reporting products, it is important that proposals to fund the preparation of biennial update reports and national communications demonstrate how these projects will build sustained institutional and technical capacity to undertake this reporting in a regularized way going forward. This is a key piece of information required by the GEF in order to assess the project proposals as well as their results.
- It takes time to establish the internal technical and institutional capacity to prepare these funding proposals, as well as to maintain and regularly update inventories, and preparing Biennial Update Reports (BURs) add a further reporting obligation for developing countries. We must work together to ensure that developing countries

have the tools they need to regularly prepare these reports going forward.

✓ *USA's Comments*

- The United States strongly supports this proposed program to facilitate reporting to the UNFCCC.

15. Sierra Leone - UNDP: Energy Efficient Production and Utilization of Charcoal through Innovative Technologies and Private Sector Involvement - GEF ID = 4840

✓ *Canada's Comments*

- Canada shares the STAP's numerous concerns in regards to this project and, in particular, Canada is concerned with a lack of detail on the source of biomass for charcoal production, as well as how the project would avoid both negative impacts on biodiversity and additional land degradation.

✓ *France's Comments*

The proposed strategy is relevant, particularly as it seeks to involve both public and private sectors and targets both wood fuel 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 wood fuel.
 - 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.

✓ **Germany's Comments**

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

- It is stated on page 8 that the barrier of unclear mandates and lack of coordination among government departments and national agencies will be tackled by strengthening civil society organizations. Please elaborate a bit more on the impact chain. So far, it is unclear how CS will remove the barrier.
- How is the dissemination of improved cook stoves (ICS) and efficient kilns going to be done? On page 9 of the proposal it is mentioned that a “large scale program for the financing of 1,000 energy efficient charcoal kilns and 15,000 ICS” will be designed and implemented. It seems that carbon finance will also play a role in this. A Toyola cook stove costs about US\$7 (p. 6). Will there be a subsidy on ICS and if so, how do you secure the sustainability after the project’s intervention and with regard to the uncertainties of the future of the carbon markets?
- What exactly is mentioned by „phase-out of traditional cook stoves“ (p. 2)? As 90% of the traditional cook stoves are three-stone stoves, an obligatory phase-out might be difficult to implement. However, the proposal suggests that there might be an “obligation for the consumers to use more expensive ICS and more efficiently produced charcoal” when it lists the likely effects happening without the project. Is it

planned to prohibit the use of traditional cook stoves? The section is at least ambiguous and should be revised.

- Lessons learned from ICS dissemination in other countries of the region will be considered when selecting adequate technologies. In addition, lessons learned should also be consulted when drafting the dissemination plan and stakeholder consultations. It should be assessed and/or mentioned in the final project document if there are any existing activities on ICS already in Sierra Leone that should be taken into account.

16. Tanzania - UNIDO: Promotion of Waste-to-Energy Applications in Agro-Industries - GEF ID = 4873

✓ *Canada's Comments*

- Canada shares the STAP's concerns regarding the seasonal availability of agricultural residues for biogas as well as the financial-related concerns, such as potential for cost recovery through electricity feed-in tariffs.
- We note, however, the considerable interest of the Government of Tanzania and the private sector in investing in the project and see their co-financing as a positive element of the project.
- The project proposes setting up a revolving financing facility and then investing in demonstration projects. We would be interested in hearing whether it would be preferable to have a few demonstration projects in key sectors before offering financial support. Alternatively, if the technology and the market are ready, perhaps a separate demonstration project is not required, and the initiatives supported initially by the financing facility can be used as "demonstrations" for broader uptake. Please comment.

✓ *Germany's Comments*

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

- The project proposal argues that the replication potential depends on the availability of agro-industrial wastes, of which there is plenty, and on an appropriate enabling environment. However, economic feasibility of waste-to-energy projects is another key factor in achieving the targeted replication rate. We thus recommend including an (indicative) investment analysis for the promoted technologies. Such analysis would be the basis to explain the significant difference in cost efficiency between supported demonstration projects (13.9 USD/tCO_{2e}) and the replication projects (2.78 USD/tCO_{2e}).

INTERNATIONAL WATERS

17. Regional - UNDP: Enabling Transboundary Cooperation and Integrated Water Resources Management in the Extended Drin River Basin - GEF ID = 4483

✓ France's Comments

- 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.

18. Regional - UNDP: Reducing Pollution and Rebuilding Degraded Marine Resources in the East Asian Seas through Implementation of Intergovernmental Agreements and Catalyzed Investments (PROGRAM) - GEF ID = 4936

✓ France's Comments

- 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 enable local actors including ICM committee to access relevant information and best practices developed at regional level.

Opinion: favourable.

✓ **Germany's Comments**

Germany requests that the following points be taken into account during the drafting of the final project document:

- The proposed project aims to rebuild and sustain coastal and ocean ecosystem services in the East Asian Seas Region through scaling up of partnerships, capacities and investments at the regional, country and local levels. It is very ambitious with high targets. Germany requests UNDP to make sure that there is a clear commitment of the targeted states concerning the intended cooperation and in particular acceptance of investments and its conditions, e.g. through the involvement of the GEF World Bank Pollution Reduction Investment Fund, and to provide information about it in the final project document.

LAND DEGRADATION

19. Argentina - UNDP: Sustainable Land Use Management in the Drylands of North-west Argentina - GEF ID = 5044

✓ Germany's Comments

Suggestions for improvement to be made during the drafting of the final project document:

- Since participatory implementation is one of the key factors for success of the project and based on previous experiences in Argentina, we would suggest to consider with much more emphasis the INTA (Instituto de Tecnología Agropecuaria), especially the National Coordination for Extension Services, with its country-wide network of regional centers, research and advisory stations as one of the main implementing stakeholders for the project. The INTA National Coordination for Extension Services should be involved also in project formulation and especially in the planning and realization of participatory work with the local population.
- One of the biggest problems for the rural population in the northwest of Argentina is the access to water. This shall be reflected more specifically in the final project document in order to address the preconditions for sustainable land use.
- The German cooperation is present via an integrated expert at INTA (Iris Barth, iris.barth@cimonline.de). Much experience of German cooperation in Argentina exists in the field of combating desertification. We suggest therefore to capitalize on this experience through the German integrated expert during the process of finalization of the project proposal.

20. Global - FAO: Decision Support for Mainstreaming and Scaling up of Sustainable Land Management - GEF ID = 4922

✓ Germany's Comments

Suggestions for improvement to be made during the drafting of the final project document:

- We appreciate the proposed PIF as we envisage synergies from cooperation with the mentioned ELD initiative. In order to reflect to leadership role of the founding

partners of the initiative the European Commission and Korean Forest Service should as well be mentioned.

- In component 2 of the proposed project, a global DLDD and SLM decision-support platform will be established building primarily on WOCAT and GLADIS. In decision 21/COP 10 of the UNCCD (on knowledge management, including traditional knowledge, best practices and success stories) it has be decided to elaborate “an information platform related to desertification/land degradation and drought, building on existing similar information and categorizations where appropriate and useful”. In order to create and use complementarity of action we suggest to further elaborate on how the envisaged platform of the project is related/ can contribute to the above mentioned COP decision.

MULTIFOCAL AREA

21. Cambodia – UNEP: Strengthening National Biodiversity and Forest Carbon Stock Conservation through Landscape-based Collaborative Management of Cambodia’s Protected Area System as Demonstrated in the Mondulkiri Conservation Landscape (CAMPAS Project) - GEF ID = 4905

✓ Germany’s Comments

Germany requests that the following points be taken into account during the drafting of the final project document:

- Germany underlines the importance of MAFF and the Forest Administration (FA) when it comes to protection of biodiversity and forest in Cambodia as they have the power and mandate for managing the national natural resources. When it comes to land use planning the MLMUPC (Ministry of Land Management, Urban Planning and Construction) has to be involved because it has the mandate for spatial planning and the knowledge for securing land tenure (see especially activities/outputs to be achieved at page 6/2.4.2).
- Apart from output 1.1.1, the program shall define the improvement of the inter-sectorial and inter-agency cooperation and collaboration itself, for example through initializing multi-stakeholder dialogues, as an objective.

22. Chile – FAO: Integrated National Monitoring and Assessment System on Forest Ecosystems (SIMEF) in Support of Policies, Regulations and SFM Practices Incorporating REDD+ and Biodiversity Conservation in Forest Ecosystems - GEF ID = 4968

✓ Germany’s Comments

Germany suggests the following improvements to be made during the drafting of the final project document:

- This is a well-researched and presented project proposal, and focuses on important synergies between the implementation processes of the UNFCCC and the CBD. In order to maximize the benefits of Sustainable Forest Management and REDD+ for biodiversity and ecosystem conservation, Germany suggests to take into account the following points in the development of the proposal:
 - As indicated in the PIF, make sure to use existing structures when establishing the

institutional coordination and work framework supporting the operation of the SIMEF. This process could also be used to improve and modify such existing structures, and maximize their potential for cooperation and joint implementation of activities. This can be achieved through targeted capacity development.

- When expanding and improving the National Forest Inventories, taking into account both carbon stocks and fluxes (flows), such information should also be taken into account when it comes to subsequently allocating financial yields and resources, following for instance a share of proceeds or a stock-flow approach which can be used to divert REDD+ funding from areas with high historical emissions to e.g. areas important for biodiversity conservation but with low historical emissions.
- Establishing and improving guidelines for SFM and REDD+ should take into account the recent results of the 11th Conference of the Parties of the CBD with regard to advice on safeguards for biodiversity conservation under REDD+ (risks & opportunities), which can contribute to maximize benefits for biodiversity and ecosystem services and to establish synergies between the UNFCCC and the CBD implementation process (in particular to the achievement of the CBD Strategic Plan and its 20 Aichi targets).
- Apart from technical aspects of climate change mitigation, sustainable forest management, and biodiversity conservation, social aspects of the proposed project should be taken into account more thoroughly in the final project document, including rights of indigenous and local communities as well as the role of traditional knowledge and practices with regard to the use and conservation of natural resources.

23. Grenada – UNDP: Implementing a “Ridge to Reef” Approach to Protecting Biodiversity and Ecosystem Functions within and Around Protected Areas - GEF ID = 5069

✓ Germany’s Comments

Germany suggests the following improvements to be made during the drafting of the final project document:

- In addition to the “Program on Integrated Adaptation Strategies” that is highlighted in the proposal and which is executed jointly by German International Cooperation (GIZ) and UNDP, Germany provides further support to Grenada through the implementation of the two regional projects “Improving the Management of Coastal

Resources and the Conservation of the Marine Biodiversity in the Caribbean Region” and “Enhancing the Adaptive Capacity of Rural Economies and Natural Resources to Climate Change in selected Caribbean Small Island and Low Lying Coastal Developing States”. Within the efforts of donor coordination, Germany proposes that in the final project document reference is also made to these two regional projects. The implementing agency and the executing partners should actively seek contact in order to ensure synergies and complementarities and that concerned national and local authorities are consulted for improved coordination and cooperation.

- The expansion of the PA system in the marine environment through 4 new MPAs may – in addition to the Ridge to Reef land use/management approach applied – require a broader spatial planning of current and future human activities in the near shore marine areas adjacent to the MPAs. This should be taken into account in the final project design and in the course of the project implementation.
- In order to effectively integrate and mainstream biodiversity conservation into the land/sea use and development planning of the Beausejour Watershed, Germany recommends to consider the application of economic valuations of key ecosystem services. The activities under component 2 could benefit from integrating these economic valuations to enhance the reaching and effect of the envisaged project results.

24. Peru – UNDP: Transforming Management of Protected Area/Landscape Complexes to Strengthen Ecosystem Resilience - GEF ID = 5080

- *There were no comments provided for this project.*

25. St. Lucia – UNEP: Iyanola - Natural Resource Management of the NE Coast - GEF ID = 5057

✓ **Germany’s Comments**

Germany requests that the following points be taken into account during the drafting of the final project document:

- The EU, through its project on “Biodiversity and Protected Area Management (BIOPAMA)” supports ACP countries through the Multi-Donor Access-and-Benefit-Sharing Capacity Building Initiative, executed by German International Cooperation (GIZ), in the implementation of the Nagoya Protocol on Access and Benefit Sharing under the CBD. Within the efforts of donor coordination and with a view to the

request below concerning capacity building on the Nagoya Protocol, it is requested that in the final project design reference is made to this project. The implementing agency and the executing partners should contact the project in order to ensure synergies and complementarities and that concerned national and local authorities are consulted for coordination and cooperation.

- Germany suggests that component 4 of the project focuses more clearly on the establishment of enabling frameworks for the fair and equitable sharing of benefits arising from the utilization of genetic resources for medical, pharmaceutical and nutritional use. Therefore, component 4 of the final project proposal should explicitly include training and measures to contribute to building capacity and creating regulatory and legal frameworks that support the implementation and consideration of the Nagoya Protocol at the national level and in the framework of the project results.
- To ensure effective conservation of both the terrestrial and marine biodiversity of the target area in the long-term and to contribute to coherent development planning as well as community-based and conservation-oriented land use planning, components 1, 2 and 3 of the final project document should include measures that link the restoration and sustainable management of forests as well as the improvement of the terrestrial and marine protected areas management with the EBM of the NE Coast under cross-sectorial and integrated coastal zone management schemes and Ridge to Reef approaches;
- It remains largely unclear in the current project proposal how long-term sustainability of the project interventions will be guaranteed. It is requested that in the final project design, greater emphasis is placed on not only assessing viability of sustainable financing options but taking this viability check further by piloting/testing such models to enable their long-term application and uptake by the state, civil and private project partners.
- As of the current project design, it is not clear, how exactly the project seeks to achieve the building of public awareness and what the respective target groups are. It is requested that the final project document defines a CEPA strategy and corresponding activities across the different components and levels of intervention (NE Coast – national).

26. Vietnam – ADB: GMS-FBP Integrating Biodiversity Conservation, Climate Resilience and Sustainable Forest Management in Central Annamite Landscapes - GEF ID = 5057

- *There were no comments provided for this project.*

PERSISTENT ORGANIC POLLUTANTS

27. Malawi – FAO: Pesticide Risk Reduction in Malawi - GEF ID = 5109

✓ Canada's Comments

- We agree with the STAP that the PIF is quite comprehensive and appears sensitive to the issues and circumstances in Malawi, including the repurposing of pesticide containers for domestic use and the need to improve life-cycle management.

✓ Frances's Comments

- 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.

28. Regional – UNEP: Continuing Regional Support for the POPs Global Monitoring Plan under the Stockholm Convention in the Latin American and Caribbean Region - GEF ID = 4881

✓ Canada's Comments

- It is indicated that the type of co-financing (grant or in-kind) from the National Governments is “unknown at this stage”, however the value has been determined. The type of co-financing should be confirmed prior to CEO approval.

- The STAP identified sustainability of the project as a risk; however, this is not reflected in the risks section of the PIF. For example, it was suggested that the project outline how it will get the buy-in of other government ministries, particularly health (as they are better equipped to test mothers' milk), and other government organizations are only briefly mentioned in the stakeholders section, but their role is not clear. Please clarify in the risk section.
- Canada is encouraged to see that data from the first passive sampling campaigns are already available and that this proposal builds on the earlier one. However, the current proposal places too much emphasis on developing "country" capacity for POPs monitoring at the expense of "regional" capacity. To build regional capacity, only one or two qualified labs for each media would be required, and this can be achieved in relatively little time, unlike building capacity in each country in the region. Overall, Canada supports this proposal and the collection of samples in individual countries, but we question the need for many GRULAC countries to conduct analysis, as analysis should be more regionalized with proper QA/QC protocols followed.

✓ *Germany's Comments*

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

- Germany welcomes the valuable comments of the GEF-secretariat and concurs with the comment regarding the low co-financing ratio. Seeing that it is a regional project with several governments involved, it should offer greater opportunities to achieve a higher co-financing-ratio.

29. Regional – UNEP: Continuing Regional Support for the POPs Global Monitoring Plan under the Stockholm Convention in the Africa Region - GEF ID = 4886

✓ *Canada's Comments*

- Please confirm the type of co-financing from National Governments prior to CEO approval.
- This project will provide significant data in a region where core data is in great need. While we support this proposal in principal, we question the need for all countries in the region to have the capacity to conduct analysis. We support collecting samples in all countries.

✓ **France's Comments**

- 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.

✓ **Germany's Comments**

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

- Germany welcomes the valuable comments of the GEF-secretariat and concurs with the comment regarding the low co-financing ratio. Seeing that it is a regional project with several governments involved, it should offer greater opportunities to achieve a higher co-financing-ratio.

30. Ukraine – UNIDO: Environmentally Sound Management and Final Disposal of Polychlorinated Biphenyls (PCBs) - GEF ID = 4386

- *There were no comments provided for this project.*