



GLOBAL ENVIRONMENT FACILITY
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**COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE GEF
JUNE 2019
WORK PROGRAM**

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEF June 2019 Work Program

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**JUNE 2019 GEF WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE: GEF/C.56)**

IMPACT PROGRAMS

- 1. Global – (Burundi, China, Colombia, Cote d'Ivoire, Ethiopia, Ghana, Guatemala, Indonesia, Kazakhstan, Liberia, Malaysia, Mexico, Papua New Guinea, Peru, Tanzania, Thailand, Ukraine, Vietnam): Food Systems, Land Use and Restoration (FOLUR) Impact Program (World Bank, UNDP, IFAD, WWF-US, CI, UNIDO, UNEP, FAO) (GEF Program Financing: \$213,268,554) GEF ID = 10201**

✓ *Canada Comments*

- Forest coffee alone may not generate adequate sustainable income for Ethiopian communities or enable them to earn a decent livelihood.
- Apart from the forest coffee, the proposed intervention could consider to diversify the income/benefit streams for the forest communities by including other non-timber forest products such as honey, natural herbs and spices and other forest products and support the value chain development for these NTFPs.
- This would ensure the initiatives ultimately enable the target community to generate tangible benefits that can meaningfully contribute to the betterment of their livelihood and become an economic incentive to manage and conserve their natural capital, the forest resources.
- In addition to coffee the project has also proposed to target cereal production systems in Agricultural Commercialization Clusters where wheat and maize are priority crops, particularly those in proximity to forests and coffee landscapes.
- It is preferable to prioritize the development of forest based livelihoods/production rather than the cereals, to minimize risks of encroaching to forests.

Ethiopia's Forestry sector -

- The two regions in Ethiopia included as target areas for the proposed initiative are endowed with highland forests which are valued for their biodiversity and their hydrological functions that supply the fresh water important to Ethiopia and countries in Nile basin, such as Sudan and Egypt.
- These forests are also of global significance in two ways:
 1. The highland and lowland forests and woodlands sequester some 300 million tons of carbon dioxide/year, a major greenhouse gas (ENTRO, 2007);

2. The forests contain 1.4 million ha of wild coffee forest. These forests have the greatest genetic variability in Ethiopia and, given the very narrow genetic base of coffee in the rest of the world and the low genetic variability in eastern Ethiopia, this re-enforces the importance of the wild coffee gene pool in the south and south-western Ethiopia (Kassahun Tesfaye Goletu, 2006, Tadesse Woldemariam, 2003).
- However, these forests have been suffering from encroachment and degradation for many years. It was estimated that, on average, about 28,916 ha of the forest land is cleared annually (Sutcliffe J P 2009).
 - The main direct drivers of deforestation are small-scale agricultural expansion and fuel wood consumption, and to a lesser extent, illegal logging and forest fires (FDRE, 2011c).
 - Another important driver has been identified as large-scale agricultural investment, which until recently was promoted by the Government as a vehicle for rural development and economic growth.
 - Pressure on forestlands from agricultural expansion and fuel wood consumption are likely to increase in the future if population growth in Ethiopia continues at the current trend rate of increase of 2 per cent per annum (NDC 2015). The NDC document indicates that CO₂ Emissions due to deforestation are projected to grow from 25 million tons CO₂e in 2010 to almost 45 million tons in 2025.
 - The forestry sector, however, also offers huge abatement potential through reduced deforestation and forest degradation.
 - The Ethiopia Climate-Resilient Green Economy (CRGE) Strategy has identified a number of low carbon emitting initiatives across key economic sectors (forestry, energy, livestock, agriculture, transport and industry), which can lead Ethiopia towards its vision of building a climate-resilient middle-income economy by 2025.
 - The strategy aims to maintain the annual GHG level of the country at the 2010 level of 150 million tons of CO₂e by 2030. The largest share of emission reduction effort (50% of the national emission reduction target by 2030) is expected from the forest sector through better management of existing forests; forest cover expansion; and usage of fuel wood as a substitute for fossil fuels.
 - REDD+ and Participatory Forest Management (PFM) adopted by the Government Ethiopia are the major instruments in place for sustainable management of forest resources. The REDD+ strategy is particularly considered as one of the four fast-track programs for realizing targets set in the CRGE and NDC.
 - The REDD+ strategy is also embedded within the National Forest Sector Development Program (NFSDP) which aims to contribute to the achievement of the CRGE targets through improved management of existing natural forests and expansion of forest cover through afforestation/reforestation.

Ethiopia has also planned to plant 16.1 million ha of new forest to double its forest cover by 2025. Moreover, the Growth and Transformation Plan (GTP II 2016-2020) calls for integrating environmental sustainability into agricultural programs, and rehabilitating degraded land (GTP II target of 22.5 Mil ha), watershed development (target of 41.35 Mil ha), and forest cover (target of 20 percent).

✓ **Germany Comments**

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

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

- The PIF does not adequately address some fundamental structural challenges of the conventional agricultural production system. Germany would like to request a more explicit analysis of the prevailing transformation challenges towards ecologically sound intensification in both small farming and industrial farming systems, as these substantially affect the described correlation between commodity production and deforestation. Germany suggests addressing these challenges with regard to the agricultural research system, extension system and incentive system more explicitly.
- The text systematically narrows landscape ecosystem challenges down to forest resources. Consequently, the lack of conclusive regulatory frameworks on soils and targeted incentives for sustainable soil management are not addressed in the PIF. Germany would like to suggest, that the vital role of soil ecosystem services are more specifically spelled out in the program description and analysis of root causes, and to include GSP/FAO in the list of relevant stakeholders.
- Furthermore, Germany would like to suggest stronger reference to Land Degradation Neutrality (SDG 15.3) targets and policies. The link of this PIF to the LDN conceptual framework (SPI/UNCCD) needs more systematic elaboration and should include an explicit reference to UNCCD as the custodian agency for SDG 15.3. The Economics of Land Degradation Initiative (ELD) and the Economics of Ecosystem Restoration by FAO should be taken into account in component 3.

✓ **Norway-Denmark Comments**

Food Systems, Land Use and Restoration (FOLUR) Impact Program:

- We welcome the proposed IP on Food Systems, Land Use and Restoration. We note that the program includes commodities as well as food crops – challenges may be similar in some ways but are not always identical. Both agriculture itself and surrounding lands contain genetic resources for food and agriculture, a vital resource for resilient food production in coming years. It is therefore timely to focus on Food Systems and their effect on the environment. We would,

however, like to be informed more in detail on how the program will ensure "adaptation benefits by creating more climate-resilient and disease-reliant plants" as stated on page 41 in the main document. We note that the issue of challenges for certain food crops due to climate change has also been brought up by the STAP in their review of this Program.

- In our view this program seems to be a series of individual projects or activities which have been put together under one program. It is unclear how this is a program which has been built with the intention to tackle a specific issue or problem. The program tries to convert all the individual project activities into higher level outcomes.
- In addition, we find the expected outcomes to be rather unclear/ not precise in which case the indicators also become quite toothless. The extent of the influence of this program depends on the formulation of the outcomes and we wonder whether these are clear enough and understandable. We suggest strengthening these and formulating them in a more specific way. As for the indicators to the outcomes we do not find them clear and specific enough. We also wonder whether they measure change rather than outputs. Targets also seem to be missing.

✓ **United States Comments**

- **Coordination.** This program will overlap thematically and possibly geographically with several U.S. projects and programs. In Guatemala alone, this includes USAID Feed the Future and Environment projects and the Office of U.S. Foreign Disaster Assistance (OFDA) program. To ensure complementarity, avoid duplicity and set the tone for coordination from the start, we would like more information on the geographic and technical scopes, as well as partner information. Additionally, we recommend coordination by Implementing and Executing agencies with several stakeholders or projects, including USAID/Guatemala, the National Forestry Institute (INAB) Forest Incentives Program, USAID/OFDA, La Secretaría de Seguridad Alimentaria y Nutricional de la Presidencia de la República (SESAN), and La Coordinadora Nacional para la Reducción de Desastres de Guatemala (CONRED). Similarly, there are ongoing jurisdictional efforts aimed at reducing emissions linked to soft commodity production (ISFL, FCPF, Governors Climate and Forest Task Force) in many of the proposed program areas. How will this impact program support for those ongoing efforts and utilize the work these entities have done on the components outlined in the IP?
- **Gender.** It is insufficiently clear how the program will incorporate actions that will address the institutional constraints on gender equity and women's economic empowerment on the part of implementing partners (government agencies) and key stakeholders (non-gender oriented CSOs). For example, although the program expresses an interest in providing greater training of women and in increasing their number in leadership roles within groups supported by FOLUR, there is no mention of how government policies and practices (at the national or decentralized levels) will continue to support these

initiatives upon the completion of the program cycle. There is also no mention of promoting gender sensitive procurement to encourage economic empowerment of women. Another concern is the gendered rates of literacy; if literacy rates are low, how will female small holder farmers be guided on how to read the labels of agro-chemical inputs so that applications can be applied in a safe and environmentally friendly manner? The issue of gendered literacy also extends to access to credit and land tenure (e.g. title deeds). What strategies are being considered to encourage best practices for measures to increase access to credit for female smallholder farmers and gender sensitive procurement? Finally, the sustainability/durability of interventions to incorporate gender equity and economic empowerment of women at the conclusion of the program cycle could be made clearer.

- Knowledge management. What plans are there to ensure that the proposed “knowledge to action” platform will not repeat the efforts of other ongoing platforms (e.g. the Tropical Forest Alliance 2020, and Good Growth Partnership)?
- Additional questions. Given the demographic changes in much of Africa and Asia, how will the program address the various constraints (financial, legal, etc.) that impede the ability of youth (18-25 years) to access productive inputs such as land?

2. **Global – (Angola, Botswana, Burkina Faso, Kazakhstan, Kenya, Malawi, Mongolia, Mozambique, Namibia, Tanzania, Zimbabwe): Sustainable Forest Management Impact Program on Dryland Sustainable Landscapes (FAO, World Bank, IUCN, WWFUS) (GEF Program Financing: \$95,844,674) GEF ID = 10206**

✓ **Canada Comments**

- The project should be mindful of security risks in countries where programming will be implemented.

✓ **Germany Comments**

- Suggestions for improvements to be made during the drafting of the final project proposal: The full proposal would gain even more in strength with a stronger focus on the landscape approach. We also recommend to establish clear working relations with the AFR100 Secretariat for knowledge exchange, monitoring and tracking in both methodology and actual figures.

✓ **United States Comments**

- Coordination. Consider partnering with the Zimbabwe Environmental Law Association (ZELA) during the formulation and implementation phases: <http://www.zela.org/>.
- Land tenure and political stability. For all child projects, additional information on the diversity of land ownership arrangements on terrain subject to the

program's interventions will be required moving forward. Several of the countries included in this program have endured recent and chaotic land redistribution schemes, and a successful (and durable) set of interventions would presumably influence land value moving forward.

- Additional questions. Can the GEF or the implementing agency further justify the contribution of additional external resources, given the widely reported absence of successful coordination between Namibian state entities to enforce current laws prohibiting the logging and export of indigenous tree species?

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Can the GEF or implementing agency further justify the contribution of additional external resources given the widely reported absence of successful coordination between Namibian state entities to enforce current laws prohibiting the logging and export of indigenous tree species?
- Can the GEF please affirm that no logging of primary forests will occur during the implementation of project?

3. Regional – (Cameroon, Central African Republic, Congo, Congo DR, Equatorial Guinea, Gabon): The Congo Basin Sustainable Landscapes Impact Program (CBSL IP), (UNEP, IUCN, World Bank, WWF-US) (GEF Program Financing: \$57,201,127) GEF ID = 10208

✓ Canada Comments

- The technical advisory panel made interesting observations which may be useful to highlight again:
- There are two particular deficiencies: identifying and addressing the barriers to scaling and transformation, particularly with regard to vested interests; and articulating a clear theory of change (TOC) that links drivers of deforestation/forest degradation and their root causes to project structure, outcomes and overall objective, and which identifies critical assumptions. STAP recommends further clarification of barriers and how to address them, along with the development of a clear, detailed TOC with a clear logical sequence of the steps and assumptions required. In the PPG phase, the CBSL should provide detailed and realistic objectives that can be monitored and measured (and adjusted if necessary) over time.

✓ Norway-Denmark Comments

Congo Basin SFM IP:

- Our constituency welcomes this project but is very concerned about possible overlap with the work of the Central Africa Forest Initiative, CAFI which

Norway, among others, is an important donor to. We would strongly encourage finding mechanisms that will ensure the best possible coordination between these two programs and avoid any double reporting. Coordination meetings should take place at the country level since each country has different projects. More specifically:

- In terms of the results and indicators, how to ensure that there is no double reporting compared to CAFI-funded programs?
- Component 1 of the program “Enabling integrated framework for countries in targeted transboundary landscapes to plan, monitor and adapt land management and leverage local, national and international investments for SLM/SFM” as well as the land use planning methodology developed under the regional component of the program, overlap with the land use planning efforts in DRC and Gabon and potentially in Rep Congo. CAFI and the country focal points should be associated to the methodological work to avoid duplication or guidance contrary to on-going work already funded by CAFI.
- Equateur provincial program in DRC (FAO and WWF as implementing agency, approved in 2018): It would be important that in the program development phase the deliverables of the CAFI program could be mapped and a gap analysis be conducted to make sure that the GEF program in the same area does not duplicate those efforts.
- Tenure and natural resource rights are supported in DRC by CAFI both through the national land tenure reform process as well as the above-mentioned Equateur program.
- It is unclear to us whether CAFI funded programs are counted as baseline investments or co-financing. More specifically:
 - If baseline investment; its characterization as sectoral and lacking integration (page 45) should be reconsidered as this is not in line with CAFI’s stated objectives nor the realities in the field.
 - If considered co-funding, then it is very important to further ensure synergies:
 - The document already mentions that CAFI should participate in the steering committee of the impact program and that the CAFI focal points will participate in the steering committees of the national Child projects. This is very positive.
 - Synergies should be further enhanced before the setting up of such committees (i.e. during the program development phase to avoid duplication with CAFI programs):
 - By sharing the GEF project approval cycle with the CAFI secretariat and exchange views before decision-making points so that CAFI can comment the documents

- Same at the child project level, share programming cycle with the CAFI focal points and allow them to participate in the development of the project documents.
- The risk analysis underestimates some risk factors and should be updated. The role of COMIFAC in this program should also be re-assessed as it has a limited mandate. More specifically:
 - R1: National governments (ministries, politicians) and the various regional sectoral and cross-sectoral bodies do not provide adequate political, institutional, and financial support to the objective of the CBSL IP – this is high risk: all the endorsements provided in the document come from low to senior level officials from Ministries of environment.
 - R6: Private sector partners not interested in diminishing their exposure to deforestation and other material risks – being involved in the program development (probably being consulted) does not mean that private sector will invest, this is an underestimated risk.
 - R8: High transaction costs related to coordination and collaboration in a program involving six countries, three GEF Agencies, and multiple partners.
 - R9: Resistance/ complexity related to transboundary collaboration – this risk especially between specific countries should not be underestimated.
 - R11: Risk of duplication with existing programs as mentioned above.
 - COMIFAC is primarily a sectorial institution, interacting with the ministries of forestry and environment in the region. The program document should therefore rethink the role of COMIFAC as a normative body especially in an area where it does not have any mandate (land use planning is not the responsibility of ministries of forestry).

✓ **United States Comments**

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Recognizing that the intent of these projects is to mitigate or reverse deforestation, the United States needs to officially confirm for internal purposes that the following projects will not involve any logging of primary forests. Can the GEF please affirm that no logging of primary forests will occur during the implementation of projects: 10125, 10184, 10188, 10192, 10198, 10206, 10208, 10220.

4. Regional – (Bolivia, Brazil, Colombia, Ecuador, Guyana, Peru, Suriname): Amazon Sustainable Landscapes Program - Phase II (World Bank, CI, FAO, IFAD, UNDP, UNIDO, CAF, WWF-US) (GEF Program Financing: \$88,305,273) GEF ID = 10198

✓ *Norway-Denmark Comments*

General:

- We Support the overall ambition of the programme, underlining the importance of the Amazon in providing ecosystem services.
- What is the experience with phase one of the project? Is there an evaluation/assessment or more systematic lessons learned of phase I of the “Amazon Sustainable Landscapes Program” (beyond what is mentioned in the document)? Why do you seek to extend the project? The Program Framework Document (PFD) for Phase II of the program suggests adding four additional countries; Bolivia, Ecuador, Guyana and Suriname. We would like more background and analysis regarding this decision, as well as more information about the GEF’s and the different agencies’ collaboration with stakeholders and governments in the different countries.
- The World Bank is listed as “lead agency” for this program, “ensuring coordination between other participating Agencies and the GEF Secretariat” and to “seek to communicate and coordinate activities with on-going GEF projects related to the Program and other donor-support investments and initiatives (including those supported by Norway, UK, USAID, GTZ, Gordon and Betty Moore Foundation, MacArthur Foundation)”. What are the experiences with coordination of activities in phase I of the project, and how will the World Bank ensure efficient coordination and communication among seven countries and other stakeholders?
- How active will the expanded Program Steering Committee (PSC) be? We note that participating countries and executive agencies/implementing agencies are listed as members, but that the ToRs for the PSC will be developed and “external participants (such as donors, indigenous peoples and others) may be invited to meetings and/or provide program management support.”
- What are the mechanisms that will be used for regional/ transnational cooperation?
- As the space for donor follow-up and seeking additional information is limited, we recommend that country focal points invite donors for an information session in the specific capitals describing the experiences from phase 1 and presenting the new activities under phase 2.

Brazil:

- The overall assessment is that the Brazilian component of the program, although relevant to the continuation and improvement of previously existing policies, as referred in the documentation, is not, overall, in line with the existing

governmental policies, leading to a potential lack of effectiveness in the application of the resources and execution of the project.

- The political situation in Brazil is changing, especially in relation to the approval of the provisional measure 867 which contain several controversial measures affecting the Forest Code, and the changes in the political bodies related to the Brazilian Indigenous people agency (FUNAI). This needs to be taken into account in the project proposal.
- The concept note makes relation to the Terra Legal Program and the CAR system as new windows for opportunity to discuss the integration of protected areas and restoration on a wider landscape. The project proposal should explain in more detail how this will take place.
- It is stated in several part of the concept note that the second phase of the project (ASL2) will build upon the efforts made in the first phase (ASL1). Positive is the analysis on lesson learned, as for example the lack of focus on freshwater issue that will be part of ASL2. It is however unclear how this will take place. The proposal would need to give a more detailed analysis on this connection.

Assessment per program component:

Component 1 - Integrated Protected Landscapes:

- The element of improved management and sustainable financing exists within the government. However, there are no comprehensive programs, plans or directives on how this will sustainably take place.
- The concept of improved management should be better defined, including within the current context.
- It is unclear how many hectares within Brazil's protected areas still lack management plans and how the improvement of the protected areas in line with a sustainable landscape approach will be achieved.

Component 3 - Policies/Incentives for Protected and Productive Landscapes

- Brazil's National Plan for Solid Waste is programmed to be elaborated in 2019, without specific deadlines. The recently published Zero Wasteland Program (Programa Lixão Zero) is to subsidize states and municipalities in the management of urban solid waste. The responsibility for implementing these policies are Municipality related. Enhanced technical support and financial incentives are needed.

Guyana & Peru

- There is little information on country level in this project. It is not clear about where the project aims to work, how they will work, which players they will team up with and how. There is little information on an activity/ output level.

Links with the current work being done on REDD+ through the Norway-Guyana agreement, and current projects undertaken in the country should be mentioned. For example- the MRV project being done through CI/Guyana Forestry Commission could be extremely relevant here.

- There should be more clarity on how the program will be coordinated with other (donor) financed initiatives in Peru including how the program will contribute towards the objectives established for the Joint Declaration of Intent on REDD+ between Norway, Germany and Peru.
- For Peru, more information should be provided on how the role of regional governments is contemplated in the program. Their ownership and active participation in the program are considered crucial for successful implementation and for achieving sustainable, long-term results.

✓ **United Kingdom's Comments**

The below comments from the United Kingdom were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- DFID couldn't identify any reference to risk assessment and contingency measures, especially when dealing with a current climate challenging Ministry of Environment, mainly to mainstream principles into the overarching policy, legislative and institutional frameworks.

✓ **United States Comments**

- Risk assessment. It will be important that the child projects more fulsomely assess and incorporate risk (including a monitoring and tracking component) from infrastructure planned as part of the Initiative for the Integration of the Regional Infrastructure of South America (IIRSA) plan, including the planned trans-amazon railway.

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Recognizing that the intent of these projects is to mitigate or reverse deforestation, the United States needs to officially confirm for internal purposes that the following projects will not involve any logging of primary forests. Can the GEF please affirm that no logging of primary forests will occur during the implementation of projects: 10125, 10184, 10188, 10192, 10198, 10206, 10208, 10220.

OTHER PROGRAMS

5. **Global – (Antigua And Barbuda, Armenia, Burundi, Chile, Costa Rica, Cote d'Ivoire, India, Jamaica, Madagascar, Maldives, Peru, Seychelles, Sierra Leone, St. Lucia, Togo, Ukraine, Uzbekistan): Global Programme to Support Countries with the Shift to Electric Mobility (UNEP, ADB, UNDP, EBRD) (GEF Program Financing: \$30,019,317) GEF ID = 10114**

✓ **Germany Comments**

Germany welcomes the proposal aiming to support countries to design and implement electric mobility programs as part of an overall shift to sustainable, low carbon transport sector. Germany welcomes the proposal as the first global inter-agency electric mobility programme and appreciates that the project clearly aims at supporting the rapid introduction of electric mobility in GEF recipient countries, hereby making a contribution to the low carbon transition in the transport sector. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

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

- Germany welcomes that the project foresees a clear role for the private sector as a supplier for electro mobility technologies. However, given that private sector investments in electric mobility will be key, Germany would welcome the inclusion of activities that specifically directed at spurring private investments in electric mobility (from the demand side). For instance, some firms have switched parts of their operations to electric fleets. These types of opportunities could be considered within the PIF.
- Germany welcomes the comprehensive and overall well-structured project design. To further facilitate an overview of the project's intended activities, Germany welcomes the inclusion of quantitative indications in the description of component 3 on how many pilot projects, regulatory measures etc are planned.
- While the proposal provides a comprehensive overview of highly relevant initiatives and programmes, Germany welcomes including existent initiatives such as the Transformative Urban Mobility Initiative and the C40 Cities Finance Facility as well as upcoming initiatives such as TUMIVolt to enable exchange of experiences as well as potentials for future collaboration. This is especially relevant considering the planned future expansion of the proposed project to countries like Nigeria and Mexico which are partner countries to above mentioned initiatives.
- Germany welcomes the proposal's reliance on IEA scenarios to lay out the project approach. To even further increase the proposal's line of argument, Germany would welcome a very brief explanation on why the proposal focuses

on the IEA's B2DS and not on the 2DS scenario when describing the programme's focus. This could for example be provided on page 26 in the first paragraph.

✓ **Norway-Denmark Comments**

- We put great emphasis on cutting GHG emissions through electrification of the transport sector. We are of the opinion that if all take concerted action, it will drive down costs because of scale production.
- Every country has to choose their own path. However, an important lesson so far is that one needs to tax emissions. You need carrots and sticks. In line with general GEF principles of an enabling policy framework, one should pay attention to relevant tax policies when designing GEF programs, including policies for reducing fossil fuel subsidies.

✓ **United States Comments**

- Feasibility. The core of this proposal for Armenia deserves further scrutiny. The claim of 5,000 electric vehicles does not fit with other statistics, for example press reports citing the Minister of Nature Protection as saying that 30 electric vehicles were imported into Armenia in 2018. While there may have been a several-fold increase in electric vehicle imports in Armenia since 2016, those imports would have started from extremely low levels. That Armenia would manufacture electric vehicles does not track with the fact there is no real manufacturing industry even for traditional petroleum fuel vehicles at present. Due to the ratcheting duties caused by incremental adoption of the Eurasian Economic Union (EAEU) common external tariff, Armenia will face steadily increasing prices for imports of cars from outside the EAEU, complicating the adoption of such technology. We encourage more background investigation before its basic feasibility can be established.

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Can the GEF please provide a breakdown of the relative funding directed to each country?
- The core of this proposal for Armenia deserves further scrutiny. The claim of 5,000 electric vehicles does not fit with other statistics, for example press reports citing minister of nature protection as saying that 30 electric vehicles were imported into Armenia in 2018. While there may have been a several-fold increase in electric vehicle imports in Armenia since 2016, those imports would have started from extremely low levels. The idea that Armenia would manufacture electric vehicles does not track with the fact there is no real manufacturing industry even for regular cars at present. Due to the ratcheting duties caused by incremental adoption of the Eurasian Economic Union (EAEU) common external tariff, Armenia will face steadily increasing prices

for imports of cars from outside the EAEU, complicating the adoption of such technology. We support renewable energy projects for Armenia but feel like this project needs more background investigation work before its basic feasibility is established.

6. Global – (Antigua and Barbuda, Barbados, Belize, Comoros, Cook Islands, Dominican Republic, Federated States of Micronesia, Fiji, Guyana, Kiribati, Maldives, Marshall Islands, Mauritius, Nauru, Niue, Palau, Papua New Guinea, Samoa, Seychelles, Solomon Islands, St. Kitts and Nevis, St. Lucia, Suriname, Tonga, Trinidad and Tobago, Tuvalu, Vanuatu): Implementing Sustainable Low and Non-Chemical Development in SIDS (ISLANDS), (UNEP, IADB, FAO, UNDP) (GEF Program Financing: \$56,000,000) GEF ID = 10185

✓ **Canada Comments**

- The project appears to address some of the systemic issues facing SIDS that prevent them from fully implementing the Minamata Convention. While not highlighted in the project proposal, greater control of imports and waste could also assist countries in fulfilling their reporting requirements under the Convention.
- This project is in line with previously adopted Stockholm COP decisions and proposed actions to the GEF in the 2018-2022 priority areas.

✓ **Germany Comments**

Germany welcomes this proposal, which addresses the major chemicals and waste issues in the SIDS through an interregional and intersectoral approach. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

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

- The risks associated to the complex management structure should be addressed in the risk section of the PIF, as well as associated risk mitigation measures. As UNEP-Chemicals has already limited management capacities, Germany recommends to ensure that sufficient resources are provided in an early stage of project preparation.
- In Component 1, the activity on “promotion and introduction of alternatives to identified priority chemicals and products (e.g. alternatives to POPs and Hg containing products, alternatives to HHPs, alternatives to certain plastics)(...)” does not clarify how identification is processed. Germany would welcome additional information on this component
- In many sectors recording on chemical components contained in products is insufficient and incomplete. Germany therefore recommends to include the

recording of chemicals and products as thematic building blocks in the component on strengthening regulatory/policy frameworks in the final proposal.

✓ **Norway-Denmark Comments**

- We are pleased that such a program is suggested for SIDS as they are especially vulnerable to these issues and have limited resources.
- Please note (1) that the programme document itself state that there have been many initiatives on chemicals and waste across SIDS in the past. A common feature of many of these has been the failure to learn from experience (both positive and negative) and, to build on results and successes. The programme intends to address this issue which is very positive.
- Several of the components refer to strengthening the national governments capacity to implement the BRS and Minamata Conventions, plus SAICM. One should be aware that there may be an overlap with UN Environment Special programme. How will this be addressed?
- Indicator 5.3 concerns the amount of Marine Litter Avoided. The target is set at 185,400.00 Metric Tons (expected at PIF) which is higher than the total target set for GEF-7. Will GEF-7's target be increased? It is also noted that marine litter estimates are based on available country baseline data in term of marine litter generated. It is noted that some of these studies are dated and the data will be confirmed, and hopefully increased during PPG.
- It is difficult to get a full overview of the elements of the program and these should be more detailed. It is positive that import control, substitution and collaboration with sectors generating waste are elements of the program. It is also positive that work is planned to promote regional management solutions as these are essential to ensure environmentally and economically sustainable waste solutions.

✓ **United States Comments**

- We believe that the overall goals of the ISLANDS program are positive and address important chemical and waste priorities, including those related to reducing plastic pollution. However, in the United States' view, the inclusion of project activities directed at advancing new national efforts to ban single-use plastic products or develop extended producer responsibility (EPR) mechanisms is not consistent with the GEF mandate, which is to achieve global environmental benefits. Single-use plastic bans do not yet have a demonstrated net environmental benefit, as analyses of the full economic and environmental impacts, including life-cycle analysis of the impact of plastic alternatives, are lacking. GEF interventions should focus on waste management to combat plastic pollution. Unless activities related to the ban of single-use plastics and EPR are removed during further project development, the United States will not be in a position to support the Pacific Regional, Caribbean Regional, Indian Regional and Caribbean Incubator Child Projects at the CEO endorsement stage.

- The United States would appreciate additional information on whether the Basel Convention Regional Centre for Training and Technology Transfer (BCRC Caribbean) has the demonstrated competency and experience in the promotion and implementation single-use plastic bans.

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Can the GEF please provide a breakdown of the relative funding directed to each country?

7. Global – (Angola, Belize, Bhutan, Cambodia, Chad, Congo DR, Ecuador, India, Indonesia, Madagascar, Namibia, Panama, South Africa): Global Wildlife Program, World Bank, UNDP, UNEP, WWF-US (GEF Program Financing: \$73,110,492) (GEF ID 10200)¹

✓ Canada Comments

- Coordination among different government agencies/authorities and active multi-stakeholder participation have been major challenges in Indonesia. The project should consider mitigation strategies to adapt to these risks/challenges.
- The project employs a positive approach by targeting landscapes in the Protected Areas (PAs)/National Parks and the surrounding forests under different administration units (not only PAs in isolation). The engagement of diverse stakeholders, including forest companies operating forest concessions in the buffer zones of PAs and private sector that integrate biodiversity conservation into their business operations, is also encouraging.
- The scope of the project seems broad, including Conservation of Habitats and Wildlife; Promotion of a Wildlife-based Economy; and Combating Wildlife Trafficking, for 13 countries spread through the world, in all in the same project. It also encompasses a variety of topics, which given the wide range of countries involved may pose a barrier to success.
- As written it is difficult to understand what could be reasonably accomplished and how. Here are a couple of examples of broad goals that may not be possible to achieve: sentence from paragraph 93 (emphasis added): “The Program will make all the necessary investments at the country and global levels and across priority source, transit, and demand countries to make the best use of these natural resources that are being mined and trashed by a few in the name of short-term gain.” Another sentence from paragraph 96 (emphasis added) indicates: “These interventions aim at delivering over 26 million hectares of terrestrial protected areas under improved management for conservation and sustainable use, and over 2.7 million hectares of landscapes under improved

¹ These are multi-trust fund projects. Only the GEF Trust Fund component is presented in this Work Program. The LDCF or SCCF components are presented separately in the LDCF/SCCF Work Program

practices, resulting in GHG emission reductions”. The project could benefit from having a narrower and better defined focus.

- While CITES is not a GEF supported MEA, the reduction in illegal wildlife trade would be complementary to goals of CITES. In terms of the illegal wildlife trade component, ECCC enforcement should review and provide their input in relation to existing initiatives associated with illegal wildlife trade (ICCWC, WENs, INTERPOL, etc.).

The project merits consideration but the goals and scope should be better defined before it moves forward.

✓ **Germany Comments**

Germany welcomes the program, which was designed following a theory of change (TOC) that addresses drivers of habitat loss and wildlife, illegal wildlife crime and lack of wildlife-based land uses. It is appreciated, that one component aims at preserving key wildlife landscapes, enhancing their resilience, and reducing threats to endangered species due to poaching and habitat loss. Enhancing management and resilience of terrestrial and marine protected areas, community, private and state reserves, wildlife corridors and OECMs as well as strengthening political will, policy and governance to connect wildlife habitats at subnational, national and transnational levels are sound and proven to work approaches. It is especially welcomed, that another component aims at promoting wildlife-based and resilient economies (such as nature-based tourism-NBT, sport hunting, legal wildlife trade under CITES and sharing proportion of protected area revenues with local communities).

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

- Germany would welcome more explicit explanations and provisions for ensuring compliance with social safeguards that are targeted at preventing human rights abuses through local enforcement agents. This should include provisions for implementing and monitoring of social safeguards as well as mechanisms for participation of local communities in decision-making.
- Although marine conservation and sustainable use are project components, the project seems to be leaving out the massive global problem of illegal fishing (IUU) and sustainable fisheries management. The promotion of sustainable use in fisheries and involving key user groups like fisheries communities in MPA-management is vital for project success. Although marine and coastal areas are mentioned as vital for climate mitigation, it is not pointed out that these areas are important nursery grounds for a variety of fish species and therefore are fundamental for the livelihood of fishing communities.
- If marine conservation is considered to be vital part of the further project development, Germany would therefore like to request the following points are taken into account:

- The project should address IUU fishing as of equivalent importance as marine IUCN species illegal wildlife trade since they represent a substantial source of such trade (e.g. shark finning). Therefore, a stronger engagement on the prevention of IUU fishing is considered necessary.
- The project should include participatory co-management through local fishing communities as integral part of Marine Protected Areas management and sustainable fisheries promotion.
- Alternative livelihood options, for both men and women, such as other blue growth opportunities (algae aquaculture) or ecotourism for local communities or vocational training programs are as important.
- Addressing fisheries, the project document should incorporate the implementation of the FAO Code of Conduct for Responsible Fisheries (CCRF) as well as the FAO-Voluntary Guidelines on Small Scale Fisheries (VGSSF) in their project design.

✓ **United States Comments**

- Coordination. There are multiple efforts in combatting wildlife trafficking across the countries involved in this program, particularly within South Africa. It will be critical that the child projects coordinate and de-conflict with ongoing work.
- Private sector engagement. The project components related to business development across the child projects are particularly vague at this stage, and we look forward to greater clarity on private sector engagement as the projects develop.
- Gender. The project components related to gender mainstreaming are similarly vague, and we look forward to greater clarity as the projects develop.
- Technical comments. We particularly appreciate the South African child project focusing on building on existing wildlife forensic capacity, enhancing the capacity of the prosecutorial sector, and expanding the scope of targeted threatened species (both terrestrial and marine).

STAND-ALONE FULL-SIZED PROJECTS

BIODIVERSITY

- 8. Azerbaijan: Conservation and Sustainable Use of Biodiversity: Strengthening Network of Protected Areas through Advanced Governance and Management (FAO) (GEF Project Financing: \$2,639,726) GEF ID = 10113**

✓ **Germany Comments**

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

- To ensure project sustainability, Germany recommends to include a clearer distinction between the activities of both components, as well as from an explicit explanation of how the components' activities feed into each other. A clear distinction between activities in component 1 and 2 is crucial in order to establish complementarity and effectiveness of activities. Many of the planned activities seem to be repeated in both components (such as assessments of the current state of governance and management structure as well as some of the capacity-building activities).
- Under component 1, the project should identify those sectors to be targeted with policies for cross-sector decision-making. Further, the analysis of the current governance and management system should be taken a step further and result in concrete policy proposals.
- Under component 4, Germany would like to the planned awareness-raising campaign for decision-makers seems rather broad and untargeted. This stakeholder group seems to be already included under the capacity-development activities of the previous components. The awareness-raising campaign should therefore be more specifically targeted at additional stakeholders or otherwise considered to be omitted.
- In addition, under component 4, the planned communications strategy targeted at 'particular audiences' seems to be undefined and untargeted. The project as such does already address a very broad set of stakeholders. The rationale for targeting additional audiences with the communication strategy should thus be more clearly explained during project development. The project would benefit from identifying the target audience from the start in order to ensure that there really is an additional audience to be addressed and to avoid inefficient use of resources.
- A successful implementation of the proposed project will depend on a realistic estimation of the possible level of co-financing. Overall, the amount of co-financing from governmental sources might seem somewhat high and the final project document should therefore explain in detail the envisaged co-financing from governmental sources (for example what kind of in-kind contributions are to be expected).

✓ **United States Comments**

- Capacity building. Enhanced capacity building in the spatial sciences would be a useful complement to this project, as it is particularly key to enabling integrated land, water and natural use decision-making and planning in institutions across sectors, at both the national and local levels. Additionally, there seems insufficient focus presently on capacity building across diverse stakeholders, including private landowners and business owners.
- Data management and sharing. This project will generate a significant amount of spatialized data, which must be properly harmonized, maintained and shared across government agencies and other stakeholders. It is not readily apparent that the project envisions ongoing operations and maintenance, which would

represent a serious gap in the project’s durability, and its ability to engage in long-term capacity building.

9. Brazil: Brazil Sustaining Healthy Coastal and Marine Ecosystems Project (World Bank) (GEF Project Financing: \$14,478,899) (GEF ID 10190)

✓ **Canada Comments**

- This project aligns with Ramsar’s Caring for Coasts Initiative which Canada supported at COP13. This project also complements Resolution Xiii.14 regarding blue carbon but with an emphasis and mention only on blue economy.

✓ **Germany Comments**

Germany welcomes the proposal, which aims to strengthen management of the Marine and Coastal Protected Areas and the enabling conditions for blue economy in Brazil. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

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

- This project spans across a considerable area of Coastal and Marine Protected Areas Systems where mechanisms for coordination and information sharing will be crucial for project success. Germany suggests that the project should indicate areas of cooperation and information sharing among administrative entities.
- The proposal would benefit from clearly stating how the innovative technologies to improve management of coastal and marine environments will be identified under component 2.

✓ **United Kingdom Comments**

The below comments from the United Kingdom were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- The WB/GEF project (GEF ID 10190), “Sustaining Healthy Coastal and Marine Ecosystems” in Brazil - DFID couldn’t identify any reference to risk assessment and contingency measures, especially when dealing with a current climate challenging Ministry of Environment, mainly to mainstream blue economy principles into the overarching policy, legislative and institutional frameworks. It would be interesting to understand how GEF perceives the work at the sub-national level and what opportunities GEF has identified thus far for Project implementation and governance.

✓ *United States Comments*

- Technical comments. The United States supports many of the STAP's comments on this project, including concern about the lack of clarity on what "blue economy principles" or the "blue economy agenda" are, what specific activities will be undertaken to offer incentives to engage in a "blue economy" as opposed to business as usual, what "mainstreaming Blue Economy principles" into policy will practically entail, and ultimately how these activities would result in reduced/reversed threats to the coastal and marine environment.

10. Chile: Economic Instruments and Tools to Support the Conservation of Biodiversity, the Payment of Ecosystem Services and Sustainable Development (UNDP) (GEF Project Financing: \$2,300,000) GEF ID = 10213

✓ *Germany Comments*

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

- Germany would like to emphasize that financial resource mobilization for biodiversity conservation needs to go hand in hand with efforts to slow the drivers of conservation costs and to improve effective spending capacity. The envisioned approach should therefore go beyond the development and implementation of innovative financing mechanisms such as payments for ecosystem services (PES) and biodiversity offsets.
- In this context, Germany kindly asks to include a section in the final project document that details how the project contributes to track, report and reform finance flows (e.g. subsidies) that are potentially harmful to biodiversity and to reform these types of finance flows to channel them towards biodiversity-friendly activities, or at least towards activities that are not potentially environmentally harmful.

✓ *United States Comments*

- Coordination. This project will overlap thematically and, in some cases, duplicate ongoing work with several existing projects and programs by such organizations as Forest Foundation Philippines and USAID Philippines. We request that the GEF SGP program coordinate with USAID before the beginning of project implementation.

11. Philippines: Implementing the National Framework on Access and Benefit Sharing of Genetic Resources and Associated Traditional Knowledge in the Philippines (UNDP) (GEF Project Financing: \$4,384,000) GEF ID = 10079

✓ *United States Comments*

- Technical comments. Some project outputs seem poorly aligned with the stated project objectives. For example, the project seeks to strengthen the national framework for implementing access and benefit sharing but does not reference the Philippine Genetic Resources Access and Benefit Sharing bill (Senate Bill No. 2167) that has been filed in the Philippine Congress. Additionally, there is no mention in the proposal of the Philippine Natural Health Products Industry Roadmap (2014-2030). It is not clear whether the selection of sambong and pili will provide the best model for access and benefit sharing, or why these products were chosen.

12. Philippines: Seventh Operational Phase of the GEF Small Grants Programme in the Philippines (UNDP) (GEF Project Financing: \$4,436,210) GEF ID = 10123

✓ *Canada Comments*

- We would like clarification on addressing the impacts of invasive alien species in the Philippines. According to the CBD webpage, the introduction of invasive alien species is one of the primary causes of species loss in forests in the Philippines, so this might be a valuable component of the program, but it's not mentioned in the current proposal.
- The project seems to have good gender and Indigenous components.

✓ *Germany Comments*

Germany welcomes this proposal, which aims to empower communities and organizations to take collective action on biodiversity through a participatory landscape planning and management approach. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

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

- The proposal builds on activities undertaken in three biogeographic regions prioritized in GEF-5. For each of these regions, Germany suggests to describe any additional activities planned under GEF-7 and what outcomes are to be expected per region.
- This project spans across a considerable area of landscapes and seascapes where mechanisms for coordination and information sharing will be crucial for project

success. Germany suggests that the project proposal should indicate areas of cooperation and information sharing among administrative entities.

- Finally, Germany also recommends including a description of what is meant with ‘innovative financing opportunities’ that are to be harnessed as ‘incentives to local land users to conserve ecosystem functions and resources and sustainably manage landscapes/seascapes’.

✓ **United States Comments**

- Coordination. This project will overlap thematically and, in some cases, duplicate ongoing work with several existing projects and programs by such organizations as Forest Foundation Philippines and USAID Philippines. We request that the GEF SGP program coordinate with USAID before the beginning of project implementation.

CHEMICALS AND WASTE

13. Regional – (Angola, Ethiopia, Gambia, Guinea, Liberia, Mauritania, Senegal, Sierra Leone, Togo, Uganda, Zambia): AFLDC-2 Scaling-up Investment and Technology Transfer to Facilitate Capacity Strengthening and Technical Assistance for the Implementation of Stockholm and Minamata Conventions in African LDCs (AfDB) (GEF Project Financing: \$21,300,000) GEF ID = 10218

✓ **Canada Comments**

- Canada can be supportive of this project, from Minamata perspective, if the recommendations and lessons learned from AFLDC-1 (mainly institutional in nature) are taken into consideration. Canada looks forward to reviewing the full project proposal.
- This project is in line with previously adopted Stockholm COP decisions and proposed actions to the GEF in the 2018-2022 priority areas.

✓ **Germany Comments**

Germany commends this proposal and welcomes the continuation of AFLDC-1. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

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

- Coordinating the number and enormous amount of Co-financings is very important to make sure that they support project goals and outcomes. Germany highly recommends to clearly outline the mechanisms and steering structure to guide this process in the final project document.

- The knowledge management section speaks mostly about communication (materials), but not on knowledge management and sharing, best practices and peer learning among countries /stakeholders. Germany suggests to include such measures in the project design to create synergies and long-term sustainability of the project.
- Additionally, Germany suggests that special attention should be given to mainstream the importance and benefits of ESM of chemicals and waste into the relevant sectors and government ministries, and be integrated into relevant components of the final proposal.
- Finally, Germany advises to include the potential lack of control and enforcement into account in the risk section of the proposal and devise associated risk mitigation measures.

✓ **United States Comments**

- We believe that the overall goals of the AFLDC-2 project are positive, and address important chemical and waste priorities related to the implementation of Stockholm and Minamata Convention obligations. However, we do not support the inclusion of project activities directed at the reduced manufacture, trade, and use of short-lived and single-use plastics, and incorporation of extended producer responsibility (EPR) measures. A project implementing these activities is not consistent with the GEF mandate, which is to achieve global environmental benefits. Single-use plastic bans do not yet have a demonstrated net environmental benefit, as analyses of the full economic and environmental impacts, including life-cycle analysis of the impact of plastic alternatives, are lacking. Unless activities related to the reduction in manufacture, trade, and use, and a ban of short-lived and single-use plastics; and incorporation of Extended Producer Responsibility are removed during further project development, the United States will not be in a position to support this project at the CEO endorsement stage.

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Can the GEF please provide a breakdown of the relative funding directed to each country?

14. China: Improvement of the Environmental Performance of the Foam Sector: Phase out and Management of Hexabromocyclododecane (HBCD) in China (UNIDO) (GEF Project Financing: \$12,600,000) GEF ID = 10163

✓ **Canada Comments**

- This project is in line with previously adopted Stockholm COP decisions and proposed actions to the GEF in the 2018-2022 priority areas.

✓ *Germany Comments*

Germany welcomes this project, which aims to contribute to the phase out of HBCD and introduce alternatives to the chemical in the production of XPS/EPS foams. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

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

- In the risk section of the proposal, Germany recommends to identify barriers to participation in project activities by Chinese chemical and foam producers, and devise associated measures to overcome these barriers. Potential barriers include
 - substitution by BEP options (most environmentally sound solutions) might not be economically feasible for a large part of Chinese producers. Awaiting bans to enter into force and/or choosing the most affordable substitute is the most likely solution for the major part of chemical factories;
 - producers are willing to change their production processes only, if a reasonable business cases and commitments for concrete purchase volumes of HBCD free foams are available;
 - Enforcement of environmental laws in China is very strict and sanctions up to factory shutdowns or being ‘red listed’ for future inspections are known. Sharing information on handling critical materials can be limited due to fears of sanctions
- Germany would highly suggest to provide additional information on whether HBCD BAT/BEP alternatives represent the selection of the best alternatives available in Component 2, and not only ‘less critical’ alternatives, thus evading future contamination and health problems.
- Regarding component 4, Germany suggests to include trainings and awareness building for Personal Protective Equipment (PPE) in the final proposal. Standard test methods for respiratory sensitization and test data are often not sufficiently available for alternative flame retardants.

15. Colombia: Strengthening National Capacity to Manage Industrial POPs within the Framework of National and International Guidelines on Chemical Substances and Hazardous Waste Management (UNDP) (GEF Project Financing: \$5,187,000) GEF ID = 10202

✓ *Canada Comments*

- This project is in line with previously adopted Stockholm COP decisions and proposed actions to the GEF in the 2018-2022 priority areas.

CLIMATE CHNAGE

16. Regional – (Botswana, Comoros, Eritrea, Zambia, Seychelles): Regional Capacity Building of COMESA Member States in Eastern and Southern Africa for Enhanced Transparency in Climate Change Monitoring, Reporting and Verification as Defined in the Paris Agreement (CI) (GEF Project Financing: \$5,250,000) GEF ID = 10093

✓ Germany Comments

Germany welcomes that the proposal identifies the interrelation of data collection and accounting capacity as requirements of the Paris Agreement. It furthermore stresses the country-driven approach in by supporting government-identified capacity needs and by including national Emission Reduction Pledges and Stated Capacity Building Needs. However, Germany kindly asks that the proposal elaborates in more detail and criteria-driven how the highest mitigation ambition potential shall be tackled if countries lack the capacity to identify the important mitigation potentials and data in the first place.

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

- Germany recommends additional measures to be undertaken to ensure that participating countries and COMESA have resources to maintain the online platforms and that the online platforms are compatible and complementary to other platforms supported by other donors. To ensure project sustainability, the full proposal should identify how the online platforms under Outputs 1.1.5. (“National Green House Gas Inventories (GHGIs) and online MRV platforms established and operationalised in each participating country and feeding into the regional online MRV Platform”) and 1.1.6 (“Regional online MRV platform for COMESA countries established and operationalised”) and outcome 3 (“Establishment of a regional CBIT integrated platform for learning and knowledge management of transparency”) will be sustained after the programme comes to an end. In addition, the following activities could be undertaken:
 - To capitalize on synergies, it should be a requirement that an analysis of potentially existing online platforms is undertaken with the aim of strengthening these rather than creating new ones.
 - Online platforms could be linked to SADC and since the focus is AFOLU, potentially also to the Southern African Agriculture Information and Knowledge Sharing System (SAAIKS) operated by the Centre for the Coordination of Agricultural Research and Development (CCARDESA)
- Germany recommends to consult project activities with the Southern Africa Development Community (SADC) and its Directorate for Food, Agriculture and Natural Resources (FANR) to ensure synergies and avoid duplications. FANR is coordinating SADCs Climate Change Strategy and Action Plan - serving 16 Member States, of which Botswana, Comores, Seychelles and Zambia are four out of a total of five of the suggested partner countries. SADC is in the final

stages of developing a new climate resilience programme with the European Union that also targets NDC implementation and enhancement.

- Finally, Germany invites to consider potential regional synergies of project activities. Training institutions receiving support to develop “Terrestrial Carbon Accounting and Agriculture MRV” training programmes under Component 2 could have regional outreach, since these are a minimum of two instead of one per country. So-called SADC Centres of Excellency could be considered.

17. Belarus: Sustainable Energy Scale-Up (World Bank) (GEF Project Financing: \$3,653,000) GEF ID = 10152

✓ **Canada Comments**

- Sustainable Energy Scale-Up’ in Belarus is well-aligned with the objectives and policy tools used in Canada’s proposed Clean Fuel Standard – a key policy to meet Canada’s own international climate targets – by incentivizing biofuel production to reduce GHG emissions (the primary difference is that the CFS targets transportation and industry in addition to households/buildings). As a result of this alignment, we view this project as sensible both from an environmental and natural resource management perspective.

✓ **Germany Comments**

Germany welcomes the proposal, which aims to scale up sustainable energy use in Belarus, relying on a combination of renewable wood biomass fuel for district heating and thermal renovation of multi-apartment buildings. At the same time, Germany requests that the following comments that should be addressed:

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

- While the project rationale is clear, Germany recommends including a more detailed account of the theory of change at output and outcome level for component 2 and 3 as those include GEF financing. For instance, example measures and activities could be included for each output under component 2 and 3.
- While information relevant for a baseline scenario and lessons learnt from previous projects in the region is included in the PIF’s project paper, the proposal would benefit from including additional baseline projects, such as the World Bank’s previous project on energy efficiency in the Belarusian building sector.
- The section on private sector engagement would benefit from a more detailed description of how the project will support participation of private actors. It is, for instance, unclear how private contractors are encouraged to participate in the bidding of contracts. Germany highly recommends outlining which measures

the project intends to use to engage private sector actors, and how such engagement contributes to outputs and outcomes.

- Germany would like to emphasize that for the envisaged use of wood biomass fuel the project needs to include appropriate environmental criteria with regard to conservation of biodiversity and local ecosystems, the use of agro-chemicals and water use so as to avoid negative environmental impacts.

✓ *Norway-Denmark Comments*

- Relatively small GEF grant contribution to larger lending program financed by IBRD and EIB seems relevant, targeted and with value added potential. As a likely inhibitor of a larger scale-up potential it is unfortunate that the current available mapping wood biomass resources for energy purposes is not sufficient to estimate its economically viable potential (component 1). The simplified two packet approach to design of thermal renovation of multiapartment buildings seems very limited (component 2).
- We would recommend allocating funding for a full-scale assessment to map the potential and assist Belarus in designing a sustainable bioenergy policy, preferably applying the FAO methodology.

18. India: Capacity-building for Establishing an Integrated and Enhanced Transparency Framework for Climate Actions and Support Measures (UNDP) (GEF Project Financing: \$3,800,000) GEF ID = 10194

✓ *Canada Comments*

- The proposed approach to increasing capacity is sector-wide (i.e. not just targeting the forest sector), but it's worth noting that it does include LULUCF, and there are some plans to under Afforestation activities, so having better data, modelling, and reporting here would be helpful.
- A point worth highlighting is an output noting that they have capacity to improve their LULUCF reporting on the data side, but don't have the necessary modelling capacity.

✓ *Germany Comments*

Germany welcomes the proposed project, which is both aligned with the objectives of the Paris Agreement and the beneficiaries' needs. However, the PIF currently lacks sufficient detail about the implementation of the project, why Germany kindly asks the following suggestions to be taken into account.

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

- Germany welcomes both the proposed creation of a National Carbon Registry (NCR), as well as a web-based tool to enhance efficiency and transparency with

climate reporting (National Institutional Coordination System (NICS)) to improve more transparency in dissemination of data and information. However, Germany would appreciate additional information about the action plan and strategy underlying the roll-out of the NICS, as well as additional information about how the two components interact and complement each other. Additional information about the relationship with the National Inventory Management System (NIMS) would also be appreciated. In this context, Germany would also recommend exploring synergies of the proposed NICS and NCR with other commitments of Sustainable Development Goals (SDGs) and Disaster Risk Reduction (DRR) to which India is a signatory.

- Germany acknowledges that the proposal mentions reporting of GHG emission inventories should in accordance with the Intergovernmental Panel on Climate Change (IPCC)'s 2006 guidelines (or latest). Germany suggests that the latest IPCC guidelines of 2013-2014 must be taken into cognizance to ensure more robustness. Furthermore, capacity building on scientific projections included in the transparency framework of the Paris Rule Book could be envisioned. Germany also suggests that the learnings and best practices in terms of reporting and review, information management across other thematic areas like Waste NAMA, learnings from NAPA, NAPS should be incorporated and fed into this process.
- Germany suggests that the process of assigning trained focal points among institutions covering each sector and state/union territory (UT) could be made more participatory and inclusive. For example, the focal point could be a consortium including civil society, academics and activists, and not just nodal ministries/line departments.

✓ **Norway-Denmark Comments**

- We are generally supportive, but we would like to note that one should be aware of similar programs and strive for synergies and not overlapping activities.

✓ **United States Comments**

- Coordination. The United States has provided inventory support in a number of areas, including forests. Building upon these efforts would be useful moving forward.
- Technical comments. Outputs 3.2.1 and 3.2.2 do not obviously contribute to helping India build capacity to mobilize climate finance, or identify capacity needs that cannot be met domestically. The framing around defining climate finance is especially problematic. The United States recommends that these Outputs be reframed to provide an assessment of what actions will be undertaken, what domestic resources are/could be made available to support this action, where support will be sought, how this support is additional to basic development / environment and energy finance, and what methodologies and assumptions are used to identify these figures. This information is already required in decision 18/CMA1 of any Party reporting on support needed and

received. We appreciate that this proposal will build on existing work and systems, but would suggest the proposal could provide more detail on the other MRV initiatives which have been undertaken in India, and their support.

- Language accuracy. The CMA decision from COP24 Katowice referred to throughout the proposal is not a draft decision, as it was adopted by the CMA. Rather, it should be referred to as decision 18/CMA.1. Additionally, on both pages 19 and 30, an inaccurate reference to the COP24 decision on Adaptation Communications is made. This reads “Adaptation communication shall provide information necessary to track the progress of the implementation and achievement of the domestic policies and measures implemented to address the social and economic consequences of response measures” as directed by COP24 guidelines. It is unclear to what this text refers, but the COP24 decision on Adaptation Communications does not require Parties to track progress of policies and measures of response measures. The closest reference is that cited in para 78 of decision 18/CMA.1 (on transparency), but this refers to a specific type of NDC that India has not put forward: “For each Party with an NDC under Article 4 that consists of adaptation actions and/or economic diversification plans resulting in mitigation co-benefits consistent with Article 4, paragraph 7, of the Paris Agreement, it shall provide the information necessary to track progress on the implementation and achievement of the domestic policies and measures implemented to address the social and economic consequences of response measures, including...”
- The guidance cited by India from decision 18/CMA.1 applies to mitigation targets of NDCs. It is not clear if the project assumes the same guidance applies to any adaptation component put forward; however it does not. There is a separate chapter of the MPGs (guidance) for reporting on adaptation.
- The United States is very pleased to see that India plans to report on all seven greenhouse gasses covered by the 2006 IPCC Guidelines.

19. Thailand: Accelerating Construction of Energy Efficient Green Housing Units in Thailand (UNEP) (GEF Project Financing: \$3,141,142) GEF ID = 10189

✓ *Germany Comments*

Germany welcomes the proposal aiming to address climate change mitigation and energy efficiency with the aim of combining greenhouse emission reduction and enhance the comfort and living space for low and middle income populations living in low rise housing units in Thailand. The proposal entails a detailed project description and explains through a thorough analysis Thailand’s current housing situation and the potential lying within the implementation of the proposed strategy planned for project. However, Germany has identified a set of risks to the successful implementation of the project, mitigation measures to which it requests to be addressed during the design of the final project proposal:

Germany requests that the following requirements are taken into account during the

design of the final project proposal:

- Germany would like to emphasize that Thailand has already piloted the suggested labelling scheme and that the Electricity Generating Authority of Thailand (EGAT) has recently restructured the underlying demand side management program, indicating potential changes in its energy efficiency strategy. Therefore, Germany would suggest that the project strategy, risk mitigation measures and corresponding outputs and indicators should be updated to account for these changes, screening for positive and negative implications.
- Furthermore, Germany seeks further clarification about how the risk of rent-seeking is addressed in the project. This is especially relevant for the proposed direct financial incentives to construction companies, which may not address the price barrier appropriately. Germany would welcome, if financial mechanisms were evaluated with respect to strengths, weaknesses, opportunities and threats, and appropriate risk mitigation measures were designed. In general, Germany would recommend financial mechanisms for construction companies to be complementary to the development of appropriate building regulation (mandatory minimum green building standards for the construction of low-rise buildings).
- In addition, Germany would like to emphasize the importance of defining a strategy and process for delivering training programs. Appropriate national or sub-national cooperation partners for the implementation of training programs must be identified and involved in project preparation and implementation, as construction is a large, fragmented and partially informal sector. To define this strategy, Germany would recommend quantifying training demand (in the construction sector / overall).
- Germany appreciates the detailed description of outputs to support the outcome. Yet, we would like to suggest strengthening the climate dimension – especially in regard to component 3 focusing on awareness raising and capacity building where it would help strengthening the link between energy efficiency and enhanced climate resilience.
- Finally, with regard to the selection of the location for the proposed pilots for the project to showcase the energy efficient greenhouses locations, Germany suggests to specify why these areas have been chosen and how a later transfer of the experiences to other parts of the country can be realised.

INTERNATIONAL WATERS

20. Regional – (Vietnam, Lao): Fostering Water and Environmental Security in the Ma and Neun/Ca Transboundary River Basins and Related Coastal Areas (FAO) (GEF Project Financing: \$8,000,000) GEF ID = 10193

✓ Germany Comments

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

- While the Ma and Neun/Ca rivers are not a river within the Mekong River Basin, the existing legal and institutional framework for cooperation provided by the 1995 Mekong Agreement and the Mekong River Commission (MRC) can provide important support and guidance for the management of the Ma and Neun/Ca rivers. Germany encourages to consider whether the project – and in particular the TDA/SAP process – can be linked to and build on existing basin management work of the MRC (e.g. its State of the Basin reporting process and its process for developing the Basin Development Strategy).
- Likewise, section 7 (on national priorities) should also consider countries' commitments to cooperative water resources management in the Mekong River Basin and beyond (including related ASEAN commitments). This would not only increase the effectiveness of the project and improve consistency of basin management approaches in the region, but also contribute to strengthening the MRC as the regional water management institution. Moreover, this could contribute to an endorsement of the TDA at a higher level than the envisaged technical level and thus increase its acceptance at the policy level in both countries.
- Under output 1.1, Germany suggests to strengthen important water uses and water use plans (namely hydropower and irrigation) as they drive the overall state of the basin and its resources (and will increasingly do so in the future).
- Under output 1.3, not only coastal ecosystems and their environmental flow needs should be considered, but also ecosystems along the river before it reaches the sea.
- Concerning output 2.1 (joint technical committees), 2.4 (IBCC) and 4.1 (interministerial committees), Germany recommends to specify the exact institutional set-up of the the committees. It remains unclear whether they are established on a temporary basis (only for the implementation of the project) or whether there is an intention to establish them for a long-term purpose (potentially leading to the establishment of a joint body between the two countries for the management of the transboundary rivers). Due consideration should be given to the role of these committees in the overall institutional structure of each country and – from the beginning on – to the process of establishing joint bodies by considering different legal, institutional and political factors (set-up, functional scope, legal personality, etc.).

- Section 2 (stakeholders) does not consider relevant bilateral donors active in Laos or Vietnam (but only multilateral donors and international CSOs). Germany would like to encourage a more careful stocktaking of existing initiatives in order to identify potential synergies, avoid overlaps and duplications and to ensure that bilateral activities and CSOs are informed about the project.
- While acknowledging that, to a certain extent, outcome 3 (pilot demonstrations) will be based on the findings of outcome 1, Germany requests more information on these pilot demonstrations so that the allocated budget is planned realistically.
- In addition to the risks identified, Germany requests that the risk for economic development priorities in the short term to compete against the efforts to improve long-term environmental conditions should be given greater consideration.
- In addition to this IW focal area project, the FAO has submitted a PIF to the LDCF - with geographical overlap in the province of Houaphan - promoting landscape approaches and measures which may have an impact on the TDA/SAP/NAP and associated measures and investments. Germany would encourage the creation of synergies between the two projects and mechanisms to ensure a coherent approach between regional and national plans (including the national NAP).

✓ **United States Comments**

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Can the GEF please provide a breakdown of the relative funding directed to each country?

21. Regional – (Costa Rica, Panama): Towards the Transboundary Integrated Water Resource Management (IWRM) of the Sixaola River Basin shared by Costa Rica and Panama (UNDP) (GEF Project Financing: \$4,386,210) GEF ID = 10172

✓ **Germany Comments**

Germany welcomes this proposal, especially its strong engagement of relevant stakeholders (e.g. Technical Secretariat of the Binational Agreement between Costa Rica and Panama, Binational Commission of the Sixaola River Basin) (CBCRS) as well as strong synergies to existing programs of international cooperation in this area.

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

- Germany appreciates that ecosystem-based management of coastal and riverine ecosystems is addressed in this proposal. Participatory involvement of local communities and traditional resource access regimes in tribal areas are seen as crucial for the implementation of ecologically sound fisheries management practices as well as for the identification of potential alternative & diversified livelihoods in the context of resource over-utilization.
- In this context, Germany would like to encourage references to, as well as mainstreaming of, the implementation of the FAO-Code of Conduct for Responsible Fisheries (CCRF) and the FAO-Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (VGSSF), which both are seen as crucial for the success of ecosystem-based management of coastal and riverine ecosystems.
- Germany notes that the project intends to cover numerous sectors (water, biodiversity, fishery, climate change adaptation etc.). In this context, it is recommended to detail how the different activities can be effectively coordinated and synchronized to avoid ineffective dispersal of funds.

22. Regional – (El Salvador, Guatemala, Honduras): Fostering Water Security in the Trifinio Region: Promoting and Formulation of a TDA/SAP for its Transboundary Lempa River Basin (UNEP) (GEF Project Financing: \$4,800,000) GEF ID = 10108

✓ *Germany Comments*

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

- Parts of the proposal (i.e. background in project justification, description of global environmental problems) still have a strong focus on the entire Trifinio region and its biodiversity issues, as the project has originally been planning to apply for funding from the biodiversity focal area and has only later been redesigned to fit the requirements for funding from the international waters focal area. Germany would suggest to condense these parts, as they do not all seem relevant, to the chosen IF-Focal Area.
- Water security also includes groundwater resources. Thus, Germany would suggest to merge parts a) and b) of the description of the key transboundary environmental problems to avoid duplication.
- The proposal correctly mentions that the Trifinio region has been subject to ample international projects, cooperation and interventions since the late 1980's, CTPT being involved in numerous on-going and completed projects. As a result, several strategic, development and action plans (with a time horizon 2025) as well as technical studies have been conducted including transboundary water resources uses and integrated water resources management. Germany would like to emphasize that the full proposal should clearly identify the benefit of developing another Strategic Action Plan by describing what previous strategies are missing. Furthermore, Germany kindly requests that the project

specifically elaborates how existing and over the past 20 years accumulated experiences and results from projects and project evaluation are used for the implementation of the project.

LAND DEGRADATION

23. Ecuador: LDN Target-Setting and Restoration of Degraded Landscapes in Western Andes and Coastal areas (FAO) (GEF Project Financing: \$4,416,210) GEF ID = 10184

✓ Germany Comments

Germany welcomes this proposal, which is relevant for Ecuador and reflects very well the specific political and technical needs in the described ecosystems.

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

- Germany kindly asks to include a section on alternative financing strategies, or other risk mitigating measures, in the risk section of the document. Co-financing of the Ecuadorian government is a high risk due to the very critical financial situation of the country. The risk of depending too much on the co-financing of the government should therefore be addressed.
- Germany recommends to involve local governments more strongly in the development of LDN targets and restoration strategies (bottom-up approach) to improve project sustainability. The proposal is very much focused on national level, the involvement and the role of decentralized governments, where the practical implementation takes place, is not very clear, they are just mentioned as stakeholders.
- Germany recommends to coordinate further planning and implementation closely with the offices of German cooperation (GIZ, KfW) to create synergies and improve the efficiency of the international cooperation in Ecuador. The proposal is complementary to various projects of the German technical and financial cooperation operating in the same ecosystems in terms of climate adaptation and mitigation, restoration, sustainable land use, forest and water management, protected area management in the Andes and coastal areas, as well as livelihood improvement of smallholders, etc.

✓ United States Comments

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Recognizing that the intent of these projects is to mitigate or reverse deforestation, the United States needs to officially confirm for internal purposes that the following projects will not involve any logging of primary forests. Can

the GEF please affirm that no logging of primary forests will occur during the implementation of projects: 10125, 10184, 10188, 10192, 10198, 10206, 10208, 10220.

24. Moldova: Moldova Agriculture Competitiveness Project GEF Additional Financing, (World Bank) (GEF Project Financing: \$3,105,023) GEF ID = 10191

✓ *No comments were received for this project.*

25. South Africa: Mainstreaming Sustainable Land Management (SLM) for Large-Scale Impact in the Grazing Lands of Limpopo and Northern Cape provinces in South Africa (IUCN) (GEF Project Financing: \$3,629,816) GEF ID = 10179

✓ **Germany Comments**

Germany welcomes the proposal and the objective to implement sustainable land management practices in landscapes that suffer the highest rates of vegetation loss and land degradation. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

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

- Germany recommends that the item value chain strengthening, including private sector engagement, should also incorporate, as far as possible, capacity development and job creation along the value chain, i.e. regarding product transformation. Further, partnerships with agri-business companies could be considered.
- Germany suggests to consider establishing cooperation with the German International Cooperation in Limpopo, where GIZ works in smallholder agriculture development (Employment for sustainable development (E4D) programme- in South Africa: Creating market linkages for smallholder farmers using innovative ICT solutions) in order to create synergies. GIZ has established a partnership with a mining company here to support economic diversification projects.
- Limpopo and Northern Cape both have the potential to develop natural product supply chains such as Marula, Moringa and others. Again, cooperation with the GIZ-supported ABS Compliant Biotrade Project could be considered.
- Regarding bush encroachment, the project should evaluate the feasibility of using biomass from bush control measures for the creation of economically viable business (wood chips, charcoal)- lessons learnt regarding this could be enquired from Ministry of Agriculture, Water and Forestry (MAWF) and the German International Cooperation (GIZ) in Namibia (Bush Control and Biomass Utilisation Project)

MULTI FOCAL AREA

26. Regional – (Grenada, Antigua And Barbuda, Belize, Guyana, Haiti, Jamaica, St. Lucia): CSIDS-SOILCARE Phase1: Caribbean Small Island Developing States (SIDS) Multicountry Soil Management Initiative for Integrated Landscape Restoration and Climate-resilient Food Systems (FAO) (GEF Project Financing: \$6,632,694) GEF ID = 10195²

✓ **Germany Comments**

Germany welcomes the ambitious approach of integrated landscape management, the proposed development of participatory strategies for the restoration of degraded landscapes, the proposed development of recommendations for improved coordination on soil information and reporting, and that the PIF addresses synergies of the Rio conventions. At the same time, Germany has the following comments that it suggests be addressed in the next phase of finalizing the project proposal:

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

- To ensure an integrated synergetic approach and avoid duplication of efforts, Germany kindly asks to seek close linkages to relevant international stakeholders and processes beyond the GSP, especially regarding the three Rio conventions. For the development of the national and subregional soil information system as well as for capacity building, Germany highly recommends partnering with the land degradation neutrality initiative of the Group on Earth Observations (GEO-LDN). Regarding SLM practices, the project should ensure a close exchange with the World Overview of Conservation Approaches and Technologies (WOCAT). In addition to linkages to GSP, the national soil experts should have linkages and ensure synergies with the Rio conventions and other relevant processes.
- The current PIF establishes a direct relationship between data availability and meeting LDN targets. However, the link is not that straight forward - many factors impede the use of data for decision making, e.g. political and human factors that play into decisions, lacking capacity to understand and interpret data, inadequate presentation of the data, mistrust in the quality of the data. The final proposal should elaborate on the approach taken to ensure that data will lead to meeting LDN targets. Applying a user- centered design process based on the principles for digital development will be crucial.
- Germany appreciates the detailed elaboration of outcomes, outputs and indicators. For outcome indicator 3.1 Germany suggest linking it to the national monitoring of SDG indicator 15.3.1. Outcome indicator 5.2 "Number of knowledge and training material disseminated in the region" is not meaningful

² These are multi-trust fund projects. Only the GEF Trust Fund component is presented in this Work Program. The LDCF or SCCF components are presented separately in the LDCF/SCCF Work Program

in terms of outcome, Germany suggests revising this indicator to account for quality and impact of the training material.

27. Afghanistan: Combating Land Degradation and Biodiversity Loss by Promoting Sustainable Rangeland Management and Biodiversity Conservation in Afghanistan, (FAO) (GEF Project Financing: \$5,906,850) GEF ID = 10169

✓ **Germany Comments**

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

We suggest that the further project development ensures that all components and subcomponents are scheduled and organized in a way that they complement each other, thus ensuring effective and efficient execution. All linkages should be clearly presented and explained: Overall, further project development should focus on providing more details on planned activities for all outputs and how these are linked to each other.

- Both component 1 and 3 include activities related to capacity building. The project should explain how these components relate to and build on each other. For example, any planned activities related capacity-building in management and policy under component 1 must integrate those stakeholder targeted under component 3 in order to ensure suitability of management and policy measures.
- The project should further indicated how any capacity development activities under component 1, support activities envisioned under component 2.
- In addition, in order to avoid disconnection between project activities and involved stakeholders, the project should outline a clear connection between components 2 and 3. For example, the stakeholder group ‘farmers’ should be included in activities under component 2 related to implementation of community-based management practices.
- Under component 1, the project should explicitly indicate based on what analysis policy formulation will be carried out, which sectors are to be targeted by policy formulation as well as which stakeholders are to be involved in the process.
- Under component 1, the project should further explicitly explain the target audience/users, expected benefits and maintenance options for the national database, indicators and monitoring system to be developed. These features may potentially entail a high demand in human and financial resources if to be maintained in the long-term. Therefore, a clear strategy for their long-term maintenance and management should be included.
- Under component 3, the project should indicate the target audience for the knowledge products to be developed. Preferably, these products would be directly targeted at those stakeholders involved in all other project components.

- Under component 3, the project should further indicate which policy recommendation, e.g. for which sectors, are to be supported by NEPA and how these related to policy formulation planned under component 1.

28. Brazil: Seventh Operational Phase of the GEF Small Grants Programme in Brazil, (UNDP) (GEF Project Financing: \$4,481,210) GEF ID = 10122

✓ **Germany Comments**

Germany welcomes the proposal due to its inclusive design integrating gender aspects, indigenous people, smallholder farmers, NGO and community based organizations.

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

- In view of the recent government change, the proposal does not yet consider current priorities and institutional capacities (esp. with regard to environmental, civil society and indigenous issues). Therefore, Germany recommends involving the Public Prosecutor's Office responsible for defending indigenous rights in a more prominent role in this project.
- Finally, Germany would like to suggest the cooperation with ongoing German cooperation projects such as “Land and Environmental Management-CAR” (technical and financial cooperation) and “Green Markets and Sustainable Consumption” (technical cooperation).

✓ **United Kingdom’s Comments**

The below comments from the United Kingdom were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- UNDP/GEF project (GEF ID 10122), “Seventh Operational Phase of the GEF Small Grants Programme in Brazil - DFID couldn’t identify any reference to risk assessment and contingency measures, especially when dealing with a current climate challenging Ministry of Environment, mainly to work in the context of existing public policies and the new National Programme for Landscape Connectivity – Conecta. As this project works with the landscape management approach, it’s desirable the UNDP holds a meeting with MAPA (Min. of Agriculture) on the FIP landscapes Project (WB managed) to avoid regional overlaps in the Cerrado.

29. Costa Rica: Seventh Operational Phase of the GEF Small Grants Programme in Costa Rica (UNDP) (GEF Project Financing: \$2,081,945) GEF ID = 10124

✓ **Germany Comments**

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

Germany acknowledges the targeted integration of environmental objectives as well as the consideration of related projects and programs, but would like to recommend following adjustments which would add to the coherence of the proposal:

- It would be very beneficial to provide details on the lessons learnt of the previous phases and how these are used to shape this new proposal (e.g. regarding the participation of local communities in landscape planning or successful mechanisms for the upscaling of SLM).
- We would appreciate information on the envisaged linkage between community projects (component 1) and multi-stakeholder platforms (component 2), taking into account potentials for organizational development.
- Kindly explain how the landscapes approach supported through the project will contribute to effective combination of institutional efforts for soil protection, biodiversity and climate change adaptation/mitigation.
- A more detailed description of the envisaged composition and division of roles of the steering committee would be helpful.
- We are pleased to see and highly appreciate that the proposal is taking sector-wise and geographically relevant GIZ-projects into consideration, and recommend close coordination and cooperation with these GIZ-projects. Kindly consider institutionalizing the cooperation during the implementation of the GEF Project in order to benefit from synergies and to provide to the overall coherence of related measures

30. Dominican Republic: Integrated Productive Landscapes through Land Use Planning; Restoration, and Sustainable Intensification of Rice Crops in the Yaque Norte and Yuna Watersheds (World Bank) (GEF Project Financing: \$ 4,063,927) GEF ID = 10216

✓ **Germany Comments**

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

- The proposal identifies as a key challenge: the lack of cooperation between institutions in charge of land use planning (MEPyD) and local level land use decision makers. The full proposal should clearly identify how the proposed solution – promoting sustainable production landscapes through capacity

development for land use planning – will address this challenge; the active participation of local land users will be crucial.

- An enabling environment for integrated landscapes management at local level may not only include incongruent land use planning but also market distortions and lack of market access, inadequate extension and service delivery mechanisms, or insecure land rights. In component 1, the project will need to identify the crucial aspects of an enabling environment. The full proposal should refer to these aspects as identified by the Global Soil Week 2019 for Africa.
- The proposal is lacking reference to LDN. The full proposal should consider the results of the 2018 UNCCD national report in the identification of priority areas and integrate the overall scientific framework of LDN especially the parts referring to land use planning.
- The full proposal should consider results and lessons learned from the GEF-funded FAO-led project „Decision Support for Scaling up and Mainstreaming Sustainable Land Management (DS-SLM)” in the design of component 2.

✓ **United States Comments**

- Coordination. Agrofrontera and Counterpart International have been working on low impact rice production, and may be useful private-sector entities for coordination.
- Technical comments. Much rice production in the Dominican Republic relies on Haitian labor, which may not be provided with proper pesticide application training and equipment. Overcoming this training gap will be critical to achieve project objectives, and should be factored into training and capacity building.

31. Honduras: Protecting Biodiversity and Recovering Degraded Ecosystems - RECOVER Honduras (UNDP, FAO) (GEF Project Financing: \$9,863,948) GEF ID = 10220

✓ **Germany Comments**

Germany welcomes the innovative and ambitious proposal, combining local governance, public finance and private sector mechanisms for ecosystem restoration. At the same time, Germany has the following comments that should be addressed in the next phase of finalizing the project proposal:

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

- To ensure that the ambitious project objectives are achieved and avoid duplication, Germany strongly recommends to prioritize project activities and link them to existing regulations, institutional capacities and stakeholder platforms, before creating new ones (e.g. integrating LDN into existing planning processes). In this context, Germany would suggest to conduct an assessment of

which project outputs can be achieved during project lifetime and suggest to involve the Ministry for Agriculture and Cattle in a more active role.

- Furthermore, Germany recommends to enable the inclusion of traditional knowledge in the project design through the envisaged consultation process. An emphasis should be put on local communities, including the indigenous and afro Honduran population.

✓ **United States Comments**

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Recognizing that the intent of these projects is to mitigate or reverse deforestation, the United States needs to officially confirm for internal purposes that the following projects will not involve any logging of primary forests. Can the GEF please affirm that no logging of primary forests will occur during the implementation of projects: 10125, 10184, 10188, 10192, 10198, 10206, 10208, 10220.

32. India: Seventh Operational Phase of the GEF Small Grants Programme in India (UNDP) (GEF Project Financing: \$4,474,886) GEF ID = 10125

✓ **Germany Comments**

Germany welcomes the detailed proposal, especially the strong inclusion of gender elements and women empowerment, particularly within adaptive management and women's participation in agro-ecosystem vulnerability analysis. Furthermore, Germany appreciates the comprehensive description of climate benefits of the project, highlighting the synergies between focal areas. At the same time, Germany has the following comments that should be addressed in the next phase of finalizing the project proposal:

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

- To avoid duplication of activities and create synergies with existing projects, Germany recommends to more strongly embed the programme in ongoing programmes. Especially in Madhya Pradesh State, Germany invites the UNDP to further cooperate with German agencies in order to explore instruments developed in the field of soil management such as the digital platform niceSSM for strengthening the agricultural extension system.
- Germany further recommends UNDP to consider the lessons learned from the following completed projects in this area in further project design, and invites it to establish contact with German development cooperation agencies in India:

- “Umbrella Programme on Natural Resource Management (UPNRM)” (component of the “Indo-German Environment Programme in Rural Areas of India”), country-wide
- “Environmental Benefits through the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA)” in Chhattisgarh and Andhra Pradesh
- “Water Security and Climate Adaptation in Rural Areas (WASCA) in Madhya Pradesh, Tamil Nadu und Rajasthan
- “Green Innovation Centres for the Agricultural and Food Sector” (Special Initiative “One World - No Hunger”) in Andhra Pradesh, Karnataka and Maharashtra
- “Conservation and Sustainable Management of Coastal and Marine Protected Areas CMPA“, finalized in 2017, documentation available with Indo-German Biodiversity Programme
- “Access and Benefit Sharing (ABS) Partnership Project” (component of the project “Conservation and Sustainable Use of Biodiversity”)
- “Private Business Action for Biodiversity friendly Production (PBAB)”
- “Conservation of Biodiversity - Mitigating Human-Wildlife-Conflicts”

✓ **United States Comments**

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Recognizing that the intent of these projects is to mitigate or reverse deforestation, the United States needs to officially confirm for internal purposes that the following projects will not involve any logging of primary forests. Can the GEF please affirm that no logging of primary forests will occur during the implementation of projects: 10125, 10184, 10188, 10192, 10198, 10206, 10208, 10220.

33. India: Transforming Agricultural Systems and Strengthening Local Economies in High Biodiversity Areas of India through Sustainable Landscape Management and Publicprivate Finance (UNEP, IUCN) (GEF Project Financing: \$6,266,883) GEF ID = 10204

✓ **Germany Comments**

Germany welcomes this proposal, which aims to generate ambitious cross-sectoral environmental benefits in India. Especially efforts to closely integrate the private sector into project activities is highly appreciated.

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

proposal:

- Germany recommends to more closely consult with relevant stakeholders in the field of sustainable land management (SLM) land degradation neutrality (LDN), especially the Ministry of Agriculture and Farmers' Welfare (MoA&FW)
- Germany invites UNEP to seek additional consultation with its regional offices in India to avoid duplication and generate synergies with existing efforts of German development cooperation. Technical assistance activities in Madhya Pradesh and Maharashtra are likely to be extendable to Karnataka and Andhra Pradesh. This includes landscape approaches on Sustainable Soil Management, strengthening of national extension system and circular economy approach involving nutrient and carbon value-chains.
- Germany further recommends UNEP to consider the lessons learned from the following completed projects in this area in further project design, and invites it to establish contact with German development cooperation agencies in India:
 - “Sustainable Supply Chain for Perishables into Cities in India” in Karnataka
 - “Green Innovation Centres for the Agricultural and Food Sector” (Special Initiative “One World - No Hunger”) in Andhra Pradesh, Karnataka and Maharashtra
 - “Umbrella Programme on Natural Resource Management (UPNRM)” (component of the “Indo-German Environment Programme in Rural Areas of India”), country-wide
 - “Environmental Benefits through the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA)” in Chhattisgarh and Andhra Pradesh
 - “Himachal Pradesh Forest Ecosystem Services (HP-FES)” (component of the project “Conservation and Sustainable Use of Biodiversity”)
 - “Private Business Action for Biodiversity friendly Production (PBAB)”

34. Timor Leste: IKAN Adapt: Strengthening the Adaptive Capacity, Resilience and Biodiversity Conservation Ability of Fisheries and Aquaculture-dependent Livelihoods in Timor-Leste (FAO) (GEF Project Financing: \$1,766,484) GEF ID = 10181³

✓ *Germany Comments*

Germany welcomes the proposal aiming to enable fisheries and aquaculture stakeholders in Timor-Leste to adapt to climate change and manage biodiversity conservation through reducing vulnerabilities, piloting and adopting new practices and

³ These are multi-trust fund projects. Only the GEF Trust Fund component is presented in this Work Program. The LDCF or SCCF components are presented separately in the LDCF/SCCF Work Program

technologies and sharing information and knowledge.

In particular, the approach of systematically addressing climate change adaptation and biodiversity conservation on different levels in the fisheries and aquaculture sector to reduce vulnerability is appreciated. The project design is building up on many relevant interventions in the country (e.g. the EU Pacific-European Union Marine Partnership (PEUMP) Program, the FAO-Timor-Leste program and is seeking synergies with other organizations (e.g. WorldFish Center, Blue Ventures, Coral Triangle Initiative, Conservation International). It is further welcomed that the participatory involvement of local communities and traditional authorities are seen as crucial for the implementation of ecologically sound fisheries management practices and for the identification of potential climate resilient diversified livelihoods. At the same time, Germany has the following comments that should be addressed in the next phase of finalizing the project proposal:

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

- While the overarching project objective of increasing the resilience of fisheries and aquaculture stakeholders as well as their sustainable use of natural resources is well displayed, Germany strongly recommends to review component definitions to ensure that outcomes and outputs contribute to the respective components and that outputs are clearly defined.
- For instance, the output title of output 2.1. suggests a focus on resilient livelihood and biodiversity strategies, while the description of what output 2.1 entails then focuses on vulnerability assessments without clearly specifying how these would be translated into community strategies.
- Furthermore, output 2.2 seems to encompass both planning as well as piloting of new technologies. It is suggested to add an additional output in order first focuses on piloting of new technologies.
- The proposal includes an output (3.3) on a project monitoring system. Germany highly recommends reviewing the description of this output, which seems to focus on communication, and provide a more robust M&E strategy in support of the developed indicators. This would help to ensure that that project goal will be achieved and that adaptive management of the project is ensured.
- While the PIF illustrates how the project is aligned with priority areas of the country's National Biodiversity Strategy and Action Plan, and National Adaptation Program of Action, Germany recommends to update the respective sections on the policy and legal framework as well as the consistency with national priorities to confirm the project's alignment with the country's Nationally Determined Contribution at the proposal finalization stage.
- While the PIF identifies gender as an important priority and provides some examples of gender considerations could be integrated, Germany welcomes additional references on of how relevant outputs address gender considerations.

For instance, output 1.4. foresees the establishment of fishery management councils but does not reveal how the representation of women will be ensured.

- Further, Germany would recommend more specific information on how the project aims to ensure long term sustainability and maintenance of interventions (e.g. scaling up of pilots, capacity development of government officials etc).
- Finally, Germany would encourage to also include in the project proposal references to the FAO-Code of Conduct for Responsible Fisheries (CCRF) and the FAO-Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (VGSSF), which both are seen as crucial for the success of the project during the implementation.

✓ **Norway-Denmark Comments**

- The Project Identification Form (PIF) reveals weaknesses and challenges in an array of sectors and areas of the country. The plans seem quite ambitious in the three main project areas - laws and regulations; local community adaption and development; and improvement of institutions' capacity to collect climate and biodiversity data.
- The appraisal suggests several improvements of information, analyses and justification of suggested interventions in the PIF. The appraisal report documents that the applicant/agency is following up on some of these issues.
- It is often not clear to what extent problems and suggested interventions are linked to the presence of anticipated future problems caused by climate change or whether they are part of a broader developmental or historical context.
- The PIF makes due reference to earlier projects of support, including a Norwegian-supported project.

Support to the development and improvement of fisheries and aquaculture management in East Timor, however, seems justified.

✓ **United States Comments**

- Coordination. USAID is currently seeking to leverage financial resources from a U.S. small business to advance similar objectives across marine fisheries in Timor Leste, as well as domestic and international enterprises to advance similar objectives across freshwater/inland aquaculture. Additionally, the USAID/Regional Development Mission for Asia, NOAA and the Fish & Wildlife Service hold agreements with the Coral Triangle Initiative on Coral Reefs, Fisheries, and Food Security (CTI -CFF), that are already providing strong Catch Documentation and Traceability, EAFM training, and combatting of IUU Fishing. NOAA has also been engaged in spatial trainings for the Ministry of Fisheries for over five years. Coordination with these efforts in concept development and subsequent implementation with USAID would be beneficial to ensure complementarity and additionality moving forward.

35. Trinidad and Tobago: BIOREACH: Biodiversity Conservation and Agroecological Land Restoration in Productive Landscapes of Trinidad and Tobago (FAO) (GEF Project Financing: \$3,752,162) GEF ID = 10188

✓ **Germany Comments**

Germany agrees with the proposal, which will promote biodiversity conservation, restore degraded lands and improve livelihoods of rural communities. At the same time, Germany has the following comment that it suggests be addressed:

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

- Germany would like to highlight the importance of relevant indicators for monitoring and evaluation (M&E). In this context, Germany therefore suggests that with further project development, indicators for component 3 should be included in order to ensure efficient and sustainable achievement of this component, bearing in mind that a change in land management practices by farmers must at least maintain, if not improve, their livelihoods and incomes.

✓ **Canada Comments**

- In general, the project and approach looks fairly well thought out. It also appears to have a relatively strong emphasis on gender.
- The STAP Review of the project states: ‘However, one concern is the repeated statement that after "...land use plans are developed they should be shared widely with community leaders and actors to ensure that people are aware of what kind of activities should take place in which zones." (p. 44). Waiting to engage community leaders after the plans are developed rather than include them in the process is a recipe for disaster.’
- We echo this view and emphasize the importance of project co-development with local communities, Indigenous peoples and women and youth.
- The proposal has almost no references to engaging Indigenous peoples in this project. They should be included as key partners in the project.

✓ **United States Comments**

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Recognizing that the intent of these projects is to mitigate or reverse deforestation, the United States needs to officially confirm for internal purposes that the following projects will not involve any logging of primary forests. Can the GEF please affirm that no logging of primary forests will occur during the

implementation of projects: 10125, 10184, 10188, 10192, 10198, 10206, 10208, 10220.

36. Zambia: Ecosystem Conservation and Community Livelihood Enhancement in North Western Zambia (UNEP) (GEF Project Financing: \$5,338,585) GEF ID = 10192

✓ *United States Comments*

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Recognizing that the intent of these projects is to mitigate or reverse deforestation, the United States needs to officially confirm for internal purposes that the following projects will not involve any logging of primary forests. Can the GEF please affirm that no logging of primary forests will occur during the implementation of projects: 10125, 10184, 10188, 10192, 10198, 10206, 10208, 10220.

NON-EXPEDITED ENABLING ACTIVITIES

37. Global – (Burundi, Afghanistan, Azerbaijan, Benin, Dominica, Vietnam, Yemen, Pakistan, Sao Tome and Principe, Senegal, Sierra Leone, Somalia, South Sudan, Suriname, Uganda, Fiji, Gambia, Mauritania): Umbrella Programme for Preparation of National Communications (NCs) and Biennial Update Reports (BURs) to the UN Framework Convention on Climate Change (UNFCCC), (UNEP) (GEF Project Financing: \$9,900,360) GEF ID = 10167

✓ *Canada Comments*

- Benin has recently experienced a tumultuous election period without the participation of opposition parties. The situation seems to have stabilized, however the political climate remains to be monitored. Mitigation measures that consider the current socio-political environment should be integrated into the final project design.

✓ *Germany Comments*

Germany welcomes the project proposal, which focuses on capacity building for the formulation of national communications and biennial update reports to report on GHG inventories and measures taken to mitigate as well as on needed and received support. However, Germany requests that the reference to specific NDC's be strengthened.

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

- Germany appreciates that the project proposal presents the national stakeholders involved. However, Germany requests to add references to existing national mitigation plans (nationally determined contributions, NDCs), update cycles, as well as the Global Stocktake (GST) in the proposal in order to be in line with the Paris Agreement.

✓ **Norway-Denmark Comments**

- This program deals with essential follow up mechanisms on climate. We appreciate that the focus is to a large extent on LDCs/SIDS and hope that the program can be designed for maximum impact on delivery of Biennial Update Reports from participating countries.

✓ **United States Comments**

The below comments from the United States were provided prior to the Council meeting. An initial agency response was provided and can be found in the list of documents specific to the project in the GEF Portal.

- Can the GEF please provide a breakdown of the relative funding directed to each country?
- Can the GEF please justify the support of this project in Yemen, despite the ongoing conflict? While the Yemen Affairs Unit can raise climate issues with Yemeni interlocutors, the legitimate Republic of Yemen Government (ROYG) has lost control of significant parts of its territory to the Houthis, and would not be able to guarantee progress on these efforts there. The conflict has additionally caused Yemen's monetary system to cleave in two, with Houthi-controlled institutions in the north and ROYG-controlled institutions in the south. Funds channeled through one set of institutions may not make their way to the other, and there are reported instances of Houthis diverting humanitarian and other forms of aid from the international community.

38. Global – (Ethiopia, Comoros, Kiribati, Guinea-Bissau, Maldives, Niue, Papua New Guinea, Solomon Islands, Somalia, South Sudan, St. Kitts And Nevis, Timor Leste, Tonga, Tuvalu, Yemen): Technology Needs Assessments (TNA) Phase IV (UNEP) (GEF Project Financing: \$4,050,000) GEF ID = 10171

✓ **Canada Comments**

- Technology transfer is preferred to development. The cost of the research and innovation component of technology development is high and there is no effective mechanism in place to address issues related to technology development and transfer.
- The priority sectors for technology transfer have been identified through various studies and are included in NDC. These technologies need to be evaluated based on national criteria before being deployed locally.

- Any transferred technology needs to be well managed for national benefit, and also to ensure it does not displace locally available technology.
- Where relevant technological innovations are locally available, the priority should be to incubate and refine them with the goal of up-scaling or replicating them, as the case may be.
- There is also a need to build local technical capacity in the design and development of alternative technologies. This may include capacity in resource assessment, system design and development, and installation and service provision at national and sub-national/regional levels.
- Considering the current significant level of unemployment in Ethiopia, transfer of green technologies should also be considered as an opportunity for job creation and youth employment.
- Need assessments could help to develop competitive green industries, provide an overview and estimate of the market opportunity for climate and clean technology business and identify the characteristics of these markets most accessible to local firms and to small and medium enterprises (SMEs) in particular.
- The needs assessment could also serve to identify which parts of the value chain are already being targeted by local industry and provide a set of actions that can be considered to build up local green industries.

✓ **Germany Comments**

Germany welcomes this proposal, which includes local stakeholder engagement, robust evaluation processes and aims in general to enhance both, NDC implementation and NDC update. At the same time, Germany has the following comments that should be addressed in the next phase of finalizing the project proposal:

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

- While Germany appreciates that the project is aligned with the priorities of the Paris Agreement by providing targeted financial and technical support to prepare new or updated and improved Technology Needs Assessments (TNAs) including Technology Action Plans (TAPs), the proposal output 2) should elaborate more clearly on which technologies are included in the concrete implementation plans.
- In this context, Germany underlines the importance of the technologies being in line with the aims of the Paris Agreement. Therefore, Germany recommends to clearly define that the technology plans are aimed at enabling fast decarbonization, do not include any fossil fuels, and focus on renewable energies and energy efficiency.

✓ *United States Comments*

- The United States recommends the project take into consideration greater engagement with relevant higher education institutions/universities during the design and implementation of the project.