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COMPILATION OF TECHNICAL COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON INTERSESSIONAL WORK PROGRAM
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NOTE: This document is a compilation of technical comments submitted to the Secretariat by Council members concerning the project proposals presented in the January 2008 Intersessional Work Program approved by the Council on February 22, 2008.

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**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

GENERAL COMMENTS

COMMENTS FROM THE UNITED STATES

In several of the PIFs, there was confusion between project components (activities), outcomes, and outputs. In several cases, the components listed actually seem to be outcomes, and the accompanying text often didn't clearly describe what the project would do to achieve expected outcomes. There could have also been greater specificity in terms of quantification of expected outcomes and outputs in some cases.

In all cases, we believe that the projects are within the comparative advantages of the respective agencies

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

BIOLOGICAL DIVERSITY

**1. Regional: (Dominican Republic, Jamaica, St. Lucia, Trinidad and Tobago, Bahamas) :
Mitigating the Threats of Invasive Alien Species in the Insular Caribbean [UNEP]**

COMMENTS FROM GERMANY

Recommendation

Germany agrees to the project proposal. Minor changes outlined below should be made during further planning steps.

Comments

The secured co-financing agreements should be made clearer. It would be interesting to know if, when, and how, Haiti will be included in the network.

COMMENTS FROM THE UNITED STATES

This project is within UNEP's comparative advantage and it seems to be highly cost effective given its emphasis on prevention and early detection. We would like to see more detail on the pilot projects in the final document at the time of CEO endorsement. The distinction between project components/activities, outputs, and outcomes in the project framework is clear and appropriate, but we would like to see a relevant baseline and some quantified targets, where feasible.

We would like to request **one correction** to the text on page three, where it states that the United Nations had designated the Caribbean Sea as a "Special Area in 2006." The United Nations did not designate a "Special Area" but did acknowledge that the Caribbean countries would continue to develop their concept of a special area, and report back later to the United Nations.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

2. Colombia: Protecting Biodiversity in the Southwestern Caribbean Sea [IADB]

COMMENTS FROM FRANCE

The project concerns the 65 000 km² large Seaflower Marine Protected Area in Colombia.

It can be viewed as the follow up of a first 5 years World Bank/GEF now finished, which resulted in the formal creation of the Marine Protected Area (MPA), the elaboration of its management plan, the setting of its governance structure and mechanisms. This new project aims at implementing the MPA management plan with a view in particular to develop sustainable income-generating mechanisms.

The proposal raises the following remarks:

- Has the first World Bank/GEF project/program been post evaluated and what are the main conclusions?
- It is not clear up to where the first project went: did the implementation of the management plan start or not at all?
- The autonomy of the MPA, with its management at the regional level, can be seen as an advantage. It can be a weakness also when looking at the development of MPA areas nationally since it looks like the link between Seaflower MPA and the National Protected Areas System are limited. The project should also look into how to build capacity toward MPA at the national level.
- In a context, where the lack of funds is one explanation of why the first project couldn't implement the management plan, the co financing of the new project appears as weak and a serious risk.
- Size of the Seaflower Marine Protected Area (65.000 km², one of the largest MPA in the world) is given as an asset for the project, but seems instead a weakness if one considers the financial sustainability, which seems to remain hypothetical. Although the project intends to implement "financial sustainability mechanisms" for the MPA and "economic alternatives" for local users, the project preparation should more insist on the assessment of overall financial sustainability of a so huge MPA. If this has not been done during the previous project, we would recommend securing the provision of an MPA business plan before the inception of this project to get a clear vision of the incomes needed to finance the overall operating costs.
- Speaking about developing sustainable income-generating mechanisms, links should be made with other initiatives in the Caribbean (in Saint Lucia for example for artisan fishing).
-

- **No objection subject to precisions provided.**

COMMENTS FROM GERMANY

Recommendation

Germany agrees to the project proposal. Changes outlined below should be made during further planning steps.

Comments

Within the further preparation of the project, it is of utmost importance to establish a comprehensive concept for the sustainable financing of this protected area and giving due to consideration to the interest of the local population.

Cooperation with the GEF-Project 'Colombian National Protected Areas Conservation Trust Fund' should manifest itself in such a way that the trust fund guarantees for this protected area 'Archipelago de San Andres' the basic management costs.

COMMENTS FROM THE UNITED STATES

We are pleased to see that the IADB is pursuing the opportunities provided by Council decisions for greater access to GEF resources for GEF executing agencies. We believe that this project is within the IADB's comparative advantage and that it will be able to use its experience in protected areas in the region.

We would have liked to have seen greater definition of outputs (which are quite vague) and outcomes. Section A notes the challenges and problems the project seeks to address, but we would have appreciated a more straightforward description of what the project will actually do to address these issues.

The PIF doesn't clearly address how financial sustainability of the protected area will be achieved. The final document should elaborate on this more fully.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

3. Kazakhstan: Kazak Steppe Conservation and Management [UNDP]

COMMENTS FROM GERMANY

Recommendation

Germany agrees to the project proposal. Changes outlined below should be made during further planning steps.

Comments

The proposal is not convincing as regards the intervention logic from threats over barriers to outcomes and outputs. Land conversion is identified as the main threat to steppe biodiversity; the proposal does not make clear whether the establishment of new protected areas will stop the process of land conversion. Knowledge gaps are identified as main barriers against conserving Kazakhstan's steppe biodiversity. However, none of the outcomes and outputs directly addresses this issue. Nevertheless, the three main components of the project – despite not being clearly derived from the analysis – apparently make sense and are supported.

Two of the three main threats to globally significant biodiversity in Kazakhstan's steppe areas are related to land degradation (land conversion and habitat fragmentation). It is therefore surprising that the *Central Asian Countries Initiative for Land Management (CACILM)*, with GEF being one of the main partners, is not even mentioned in the proposal; we would suppose that there are many opportunities for cooperating with CACILM on enhancing land management in the steppe. We see it a priority to tune these efforts and to check all possible fields for developing synergies between biodiversity and land management.

There is commitment for a significant government in-kind co-financing in the height of US\$ 4.3 million. This amount is more what is usually be provided to a project as in-kind contribution (salaries, office rental, vehicles, etc.), taking the country's price levels into account. The amount of co-funding needs to be explained.

COMMENTS FROM THE UNITED STATES

We agree with the emphasis of this project on improving the bio-geographic coverage of Kazakhstan's national protected area system to include Steppe ecosystems and are pleased that a quantitative target has been set. We can also support the emphasis on landscape connectivity and agree with the STAP comment that land users outside protected areas need to be brought into the conservation process.

The PIF does not clearly describe what activities will be funded. Indeed, the first two “components” seem to be more outcomes. It is very unclear what will be done under component #2 to strengthen “systemic, institutional and individual capacity” in some critical areas, and these need to be addressed in the final proposal. Some issues include:

- What will be done to improve capacity to manage grasslands, including better understanding of the interactions between habitats and species?
- The proposal mentions the decline of ungulate species and the important role they play, but it fails to mention what will be done to improve enforcement efforts aimed at species protection. We suggest that UNDP examine application of an enforcement economics approach that seeks to strengthen enforcement throughout the enforcement “chain.”
- Please clarify what will be done to address the “conservative approach” and “complicated budget approval” problems that are mentioned.

If feasible, the project should establish a baseline for ecosystem health within new areas brought under protection so that improvements can be measured overtime.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

4. Mauritius: Expanding Coverage and Strengthening Management Effectiveness of the Terrestrial Protected Area Network on the Island of Mauritius [UNDP]

COMMENTS FROM THE UNITED STATES

We are impressed with the quality of this proposal. It powerfully aligns with the national action plans and we can support the project. USG technical experts believe there is sufficient internal capacity in the government to implement this project successfully.

U.S. Forest Service experts would like to collaborate with UNDP on developing and implementing this project, and we will put them in touch with relevant UNDP contacts

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

**5. Russian Federation: Strengthening the Marine and Coastal Protected Areas of Russia
[UNDP]**

COMMENTS FROM GERMANY

Recommendation

Germany agrees to the project proposal. Changes outlined below should be made during further planning steps and during project implementation.

Comments

The proposal does not answer one key question: are marine protected areas an adequate and effective conservation tool for protecting marine biodiversity? The main threats are described as oil pollution, invasive species, ecologically harmful exploitation and hazardous materials spills. The establishment of marine protected areas will at least not stop invasive species, will not avoid oil spills nor spills of other hazardous materials. The reasons why and where to establish new protected areas should therefore carefully re-thought and it should be considered whether sector mainstreaming approaches would be better solutions to the serious threats to the marine environment.

Component #3 reads “Strengthened MPA system effectively captures knowledge and enables replication of best practice”. We feel this is already an integral part of component #1 (expansion of marine protected areas) and #2 (demonstration of management know-how) and we do not see and advantage to treat it as a separate component.

COMMENTS FROM THE UNITED STATES

We can support this important project, but as with several other PIFs, there isn't a sufficient description of what the project will do to address the problems described. As with the Kazakhstan proposal, the listed components seem to be outcomes.

Project does not address how the project will address financial sustainability issues, which should be addressed more fully in the final project document.

We are pleased that the project intends to apply an enforcement economics methodology to identify weaknesses in the enforcement regime. But, this seems to be undercut by the unclear statement (in paragraph 12) that the project will only look “in the long-term” at internalizing the MPAs into fisheries management. This doesn't seem to make sense since one of the primary benefits of MPAs is to help protect fish stocks or their breeding grounds. We would like the

final project document to explain why MPAs will only be internalized into fisheries management “in the long-term.”

We are pleased that UNDP-Russia has a process for sharing lessons among UNDP projects in Russia as this is important for replication of lessons learned and innovations.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

6. Thailand: Catalyzing Sustainability of Thailand's Protected Area System [UNDP]

COMMENTS FROM FRANCE

Opinion

The project's objective is to work toward financial sustainability of Thailand protected areas system.

France welcomes such a project and fully shares the opportunity of its PA financial sustainability target. It is important for the project nevertheless to address both terrestrial protected areas and marine protected and taking into account the specificities of Marine Protected Areas.

France wishes to indicate that it supports, via the French GEF and the French Development Agency, a project on Marine Protected Areas in the Andaman Sea in collaboration with the Thai government (Department of National Park, Ministry of Environment) and the WWF. This project is in its inception phase and aims in particular at developing financial sustainability of three Marine Protected Areas: Koh Lanta, Surin and Similan. There are obvious potential synergies between this project and the project proposed to the GEF so that France recommends contacts are made quickly between AFD/FFEM and UNDP/GEF teams to look into it.

Favorable opinion

COMMENTS FROM GERMANY

The project objective "to overcome barriers to sustainable financing of Thailand's protected area system" is indeed of high importance for the sustainability of Thailand's Protected Areas.

Recommendation

Germany agrees to the project proposal. Changes outlined below should be made during further planning step.

Important elements are missing:

- Impact indicators: The mentioned "expected outputs" give an idea about the range of indicators, which show the result of the GEF intervention. However, these indicators are neither quantified nor do most of them refer to a clearly described impact. The proposal does not give a clear definition of expected results but stays rather general and leave it to open to interpretation. In this sensitive field of interventions towards financing, the indicators must give concrete guidance in order to avoid unclear interpretation of the tasks to be done, and to

show a provable commitment of each co-financing partner. It might be also part of the capacity building: training and coaching in management (for projects as well as for routine performance).

- Quality and quantity of co-financing: the proposal does not specify the source and the area of co-financing. What had really been counted? Is it the person/years, the hosting of governmental (!) organisation? Where does the private sector invest? Which NGOs contribute to what?
- Additionality, contribution to the coherence of German activities in the area of biodiversity or cooperation with Thailand: Measures from the (finished) programme "Environmentally Compatible Rehabilitation of the Tsunami-affected areas: National Park Area Mu Ko Hong" and Integration of the National Park Ko Lanta into a comprehensive development master plan for the tourism on Ko Lanta. Adaption of modern Management Instruments, which are designed for Small and Medium Sized Enterprises to the benefit for Park Management (e.g. "Profitable Environmental Management" as a tool for resource and energy efficiency). Dissemination of knowledge from the BMZ/GTZ Programme "Tourism and Sustainable Development", where the development of financial instruments for protected areas is a core objective.
- Participation of the local community and the contribution to sustainable development: this is not specified nor is there a methodological explanation, but only references to other national plans with a title or sub-title, which indicates an awareness of the need for participation and engagement of the private sector.

COMMENTS FROM UNITED STATES

This project also suffers from the confusion we have found between components, outcomes, and outputs with other PIFs in this work program. The components listed actually appear to be outcomes. We also believe there should be quantified benchmarks for outputs, with baselines, where feasible.

The project describes the problems and barriers sufficiently, but the description of what will be done to address them is insufficient. For example, the two main problems described seem to be (1) insufficient financing and (2) the need for partnership between protected areas and surrounding communities and resource users. We believe the narrative could have been more focused on what the intention is to address these problems. For instance, it mentions "unpredictable government budgetary allocations" and problems with linking planning and budgeting, but it doesn't mention what options will be explored to address these problems. The final project document should describe how the project intends to address financial sustainability issues. Is it realistic, for example, to expect that "local development boards" will decide to allocate resources to protected areas? We note also that financial sustainability issues are not mentioned as one of the risks in the chart at section F.

The final project document should also clarify how the legal and regulatory enforcement regime will be strengthened to reduce incidences in which “individuals with influence... circumvent legal and regulatory controls.”

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

7. Turkey: Strengthening Protected Area Network of Turkey: Catalyzing Sustainability of Marine and Coastal Protected Areas [UNDP]

COMMENTS FROM FRANCE

The marine and coastal areas in Turkey are considered by IUCN and the main NGO's (WWF, CI) as some of the most important ecoregions on the earth. These areas are threaded by urban and tourism development. Thus the protection of these areas is a priority for the GEF and the country.

The project aims at strengthen the Marine Protected Areas Framework. It is expected an enhanced management of MPA's, the generation of revenue adapted to the needs of MPA's and an enforced monitoring system.

All these objectives are relevant but it could be interesting to link this project with the job realized around the Mediterranean Sea with all the riparian countries by RAC/SPA to strengthen the regional MPA's Framework.

Otherwise, the FFEM/FGEF contributes with others donors (Spanish Cooperation, EU) to the PASBIO II that includes an involvement with some riparian countries. In Turkey, the PASBIO II works with Kas Kekova. It could be relevant to enhance the cooperation between this projects that aims at the same objectives.

Favourable opinion with the above suggestions.

COMMENTS FROM GERMANY

Recommendation

Germany agrees to the project proposal. Changes outlined below should be made during further planning steps.

Comments

Turkey has a very diverse structure of responsibilities for protected areas. Within the Ministry of Environment and Forestry, different organisations are responsible for SPAs and for National Parks as well as Strictly Protected Areas, and natural SIT Areas are under the responsibility of the Ministry of Culture. Coordination has traditionally been difficult. The project intends to enhance inter-agency cooperation (outcome #3), but apparently lacks a clear concept how to deal

with these often diverging interests. Although the proposal focuses somewhat on APSA, strategic decisions have to be taken to this end, e.g. when it comes to the designation of an executing agency.

The proposal stresses the need for decentralization in protected area management in particular for marine protected areas. Whereas we agree with this analysis in principal, we would appreciate hearing whether there is the necessary political consent on this issue. Significant experiences with the decentralization of protected areas management were made in the frame of the GEF-funded “Biodiversity and Natural Resources Management Project” in Turkey and it seems necessary to carefully evaluate them before going ahead. After the merger of the Ministry of Environment with the Ministry of Forestry, local management structures are available on provincial level throughout, sometimes in addition to the local management bodies of APSA.

Minor issues:

“Institutional assessment scorecard” and “Financial sustainability scorecard” should be treated as indicators, not as outcomes.

The table on marine protected areas is incomplete (e.g. Marmaris NP missing, Natural SIT Areas missing).

COMMENTS FROM THE UNITED STATES

We are pleased that this project sets quantitative targets for expected outcomes in some cases, and expect that the final project will have more specificity in this regard. We are pleased that the project is focused on strengthening marine protected areas, and from the project description, there are some significant shortcomings that need to be addressed in terms of how marine protected areas are managed.

The project document did not leave us with a great degree of confidence that key shortcomings in protected area management will be addressed effectively. For example, there appears to be significant shortcomings regarding how economic activities within (or impacting) protected areas are regulated – including development of housing and hotels and over harvesting of resources, and even poaching in some cases. These would seem to point to key shortcomings in terms of natural resource governance and regulation. The final project document will need to focus, in particular, on the steps that the government plans to take to improve governance of protected areas, including legal and regulatory reform. We are not confident that “improved coordination” between agencies alone will make much of a difference unless if the incentives and rules of the game for key agencies are addressed.

We also note that paragraph 13 contains the same (difficult to understand) language as the proposal for Russia stating that the “internalizing MPSs into fisheries management” will only be looked at “in the long-term.” Given the description in the document of unsustainable resource use, we think that this is an issue that needs more attention in the nearer term.

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (REFERENCE TO GEF/IS/17)
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CLIMATE CHANGE

8. Ukraine: Creating Markets for Renewable Power in Ukraine [EBRD]

COMMENTS FROM FRANCE

The project aims at developing the R.E in Ukraine. Ukraine strategy (2006) is to increase the share of R.E (19% by 2030 v.s. 10% today): biomass, solar, coalbed methane. Over the last 15 years, 85 MW of wind farms have been installed but the capacities can be doubled. The GEF project will support : (i) policy, procedures and standards, (ii) banking and business sector development, (iii) creation and investment in a R.E financial fund. 80 MW of R.E is expected over the project life.

Comments

The project will complement the EBRD "Ukraine Energy Efficiency Programme" (100 M€) and other projects such as (i) "Strengthening of the regulatory and legal capacities in the energy sector (TACIS / UE)" et (ii) "Implementing the concept of wholesale electricity market (WB)".

Favourable opinion

The articulation with these various projects should be detailed.

COMMENTS FROM THE UNITED STATES

We are pleased to see that the EBRD is pursuing the opportunities provided by recent Council decisions for greater access for GEF executing agencies to GEF resources. The EBRD will be able to bring to bear its experience in Ukraine's energy sector in this project.

This seems like a solid project that will remove the barriers to the uptake of renewable energy projects in the country and we think the project's focus on technical assistance in the areas of policy and regulatory reform is a sensible way to support the EBRD's investment in the proposed renewable energy fund.

We are heartened to see that the fund will only fund "bankable" projects, but we would like the final project document to describe more fully how the projects will be bankable and also the flow of funds into the renewable energy fund. Some questions to be addressed in the final proposal:

Will there be a reflow of resources from the Ukraine Renewable Energy Fund to the GEF Trust Fund?

What will the \$6 million in GEF funding be used for? Will it be part of the fund's lending resources or will it fund the technical assistance?

We believe the project should describe the strategy for replication and describe more fully its expectation of 500 million metric tons of indirect emissions avoidance. This seems high given the level of direct emissions avoidance expected.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

PERSISTENT ORGANIC POLLUTANTS

9. China: Improvement of Production Technology of Dicofol from DDT and Introduction Technology for Leaf Mites Control [UNDP]

COMMENTS FROM FRANCE

- It's difficult to see the difference between output and outcome ;
- It's very important to promote the closure of non-close dicofol production facilities as EU will soon propose Dicofol as a POP ;
- The project should take into account Rotterdam and Bâles Conventions.

Favourable opinion with the above suggestions.

COMMENTS FROM JAPAN

For gaining Japan's approval, concerns presented below should be cleared in discussing and determining details of this project.

- Although DDT is restricted on its production and use in accordance with the provision of Stockholm Convention, DDT production in China is currently permitted as a specific exemption until May 2009. Accordingly, the project's goal should be set as elimination of DDT by May 2009; otherwise we should wait for the COP's decision which relates to the extension of this specific exemption; and then, set a target, and draw up the project.
- "Others (farmers)" as co-financing resource is unclear, so this should be clarified.

In designing details of and implementing the project, it is desirable that experiences gained on "Alternatives to DDT Usage for the Production of Anti-fouling Paint (GEF ID: 2932)" are fully utilized.

COMMENTS FROM THE UNITED STATES

We had some initial questions about this project's focus on Dicofol, which is not a listed POP, but we can support it since an important component is the closure of two plants that use DDT in

dicofol production in non-closed systems and because it seeks to improve Dicofol production and moving towards dicofol phase out through alternate technologies, including IPM.

We would like to encourage collaboration with existing efforts on these issues, such as the ADB's IPM program that is under development, and use of training programs through US Environmental Protection Agency who have signed a letter of intent with ICAMA to work together on projects such as this. The US Environmental Protection Agency would like to contribute to the development of the IMP demonstration program for dicofol alternatives in China. For example, USEPA has a biopesticide grant program for IPM demonstration projects in Asia that it has administered for four years.

We believe that the final proposal should clarify the extent of expected benefits in terms of reduction in releases of DDT and DDT "impurity" from the project. It would be helpful to have a baseline estimating releases to the environment of DDT and residues resulting from dicofol production and use and targets for reduction through the project.

We would also appreciate clarification of cost effectiveness. The proposal states that the project will reduce production of DDT by 2,800 MT per year, for a cost of \$6.9 million. However, most of this reduction seems to be achieved through component 3 at a cost to GEF of \$900,000. Most of the project funding – \$3.5 million – is dedicated towards the \$3.5 million is dedicated to component 2 (IPM), and the extent of benefits in terms of POPs reduction is much less clear. We would appreciate clarification of the benefits of this expenditure in terms of POPs reduction.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

10. Kazakhstan: Design and Execution of a Comprehensive PCB Management Plan for Kazakhstan [UNDP]

COMMENTS FROM FRANCE

- The PIF should mention more precisely how they will raise awareness on POPs and how they will monitor the remediation of TCDD ;
- The project should take into account Rotterdam and Bâles Conventions.

Favourable opinion with the above suggestions.

COMMENTS FROM JAPAN

This project includes update of PCB inventory despite the fact that Kazakhstan has capability on developing inventory. In this regard, the cost for the improvement of inventory will not be considered as necessary incremental cost for implementation of Stockholm Convention in Kazakhstan, and therefore, this should be covered by other co-finance resources instead of GEF grant. For gaining Japan's approval, this concern should be cleared in discussing and determining details of this project.

It also should be noted that this project focuses on improving existing expertise; therefore, compared with other projects such as the one which focuses on developing new capability, it is less urgent and of lower priority.

As STAP pointed, we are supportive of requesting advices from STAP before CEO approval.

COMMENTS FROM SWITZERLAND

Overall Commentaries

The purpose of the project is without doubt of a very high importance for Kazakhstan. In general terms, it seems consistent with GEF consistent with GEF's strategies and strategic programmes. Nevertheless, at this early stage of planning, we have identified several questions and challenges which merit further attention for the on-going planning. Among others, they refer to the technical and economical background of the project, which is not described in much detail in the PIF document and which is necessary to assess comprehensively the plausibility of the project.

Questions, Concerns and Challenges for further Project Preparation

► PCB - inventory

According to information from National Expert of UNDP (2006), in the course of the preliminary inventory there were 3'000 tons of pure PCB containing electrical devices identified. The majority are capacitors. Up to now some 116 pure PCB containing transformers were identified.

It should also be mentioned that the inventory conducted did not cover all suspected PCB containing equipment in Kazakhstan. Enterprises liquidated during the economic crisis in the 90s did not participate. In the preliminary inventory conducted from 2003 to 2004, only big and medium-sized enterprises participated as well as sub-institutions of the Ministry of Defence and Internal Affairs.

After completion of the inventory, some 15'000 capacitors were discovered on a former Soviet military base (Daria-U). As there are other similar military objects in Kazakhstan, it can be assumed that there is much more PCB containing equipment. General lack of knowledge on PCB Management, negative impact on human health, and accumulation in soil and groundwater, will therefore increase the threats posed by PCB and its remobilisation.

Recommendations:

- With respect to the national PCB activities in general and the inventory specifically, it is recommended that the following key issues are considered:
- All applications of PCBs from closed, partially closed and open sources should be considered in the inventory and the National Action Plan. According to the findings, further or new priorities can be set if necessary.
- Spare and waste oils should also be considered as a possible source of cross contamination.
- Such oil is usually stored in used 200 litre steel drums or tanks. Original packaging of new mineral oil or other insulation oils has often been used which could lead to misunderstanding as to whether new (and non-polluted) oil is in the drums or whether the contents are uncontrolled used oil which might be contaminated by PCB.
- As the positive sample of paint from the UKCP hall clearly shows, the application of PCBs in open systems should not be underestimated and therefore be considered in the Action Plan (e.g. direct health impact on workers maintaining pipes and equipment with PCB containing coatings, but also influence by e.g. zinc, lead and mercury evaporation during maintenance work).
- An important part of the inventory should also be possibly contaminated soil and construction parts, furthermore pumps, pipes and tanks and last but not least electrical scrap at the utility sites but also at the sites of scrap recycling or transporting companies.
- It is of the utmost importance that the data obtained during the inventories is recorded efficiently until the SC requirements have been fulfilled. Therefore, a standardised database for Kazakhstan should be one of the priority activities (preferably as Access). The SBC database could be considered as the basis for that purpose.

► **PCB disposal:**

The investigation in BAT/BEP technologies for the disposal of PCB containing waste in an environmentally sound manner will be a crucial issue for Kazakhstan. However, it should be considered that technologies vary for different types of wastes and concentration of PCB. For instance, cement kilns may never be an option for transformer carcasses or capacitors.

It is recommended to compile a complete inventory on PCBs in Kazakhstan including possibly contaminated mineral oil transformers, as well as applications from partially open and open systems, in order to be in a position to estimate the extent of the PCB problem and the nature of the most important waste types. This will ease the investigation of nation-tailored disposal options. For some waste, such as e.g. PCB containing capacitors, it is recommended to solely use export to high temperature incineration plants.

► **Financial resources:**

Based on the information provided in the PIF it is not possible to evaluate if the resources available will be sufficient to fulfil the 3 main project components. The proponent should describe in more detail the activities and the resources needed in relation to the specific activities.

► **Training courses and awareness raising:**

No information is available on how the proponent will organise and conduct training modules and awareness raising seminars.

► **Analytical capacities:**

The quality of the PCB related analytical services is of a very high importance when remediation and disposal activities have to be defined and their costs calculated. The capacities and competences of analytical laboratories are not taken into consideration at all in the present PIF. An overview of laboratories and their implemented quality standards will have to be presented.

Conclusions and Recommendations

First of all, Switzerland recognises the consistency of the current proposal with GEF's strategies and strategic programmes and its importance for Kazakhstan and therefore supports the overall objective of the project.

Nevertheless, as at this early stage of planning, most information is given still in a very general manner, a series of crucial issues for project success cannot yet be assessed comprehensively and need further attention in project planning. We recommend to improve the basic information, facts and figures and to describe in more detail the planned activities and their financial consequences. In a first step, a preliminary action plan should be developed and the necessary resources should be attributed accordingly, as well as a preliminary time schedule should be outlined.

COMMENTS FROM THE UNITED STATES

We are pleased that this project will aim to strengthen the country's legal, policy and administrative framework, including building a suitable enforcement framework.

We would like for the final project to clarify what the final disposal options will be for PCBs, contaminated equipment etc. The final sentence in section A states that "export for final disposal" would be a suitable disposal option, but this raises concerns. The strategy targets tons destroyed, and it is not clear that destruction would happen if wastes are exported.

We recommend that a clear baseline and targets be included in the proposal for PCB disposals.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

**11. Vietnam: Environmental Remediation of Dioxin Contaminated Hotspots in Vietnam
[UNDP]**

COMMENTS FROM JAPAN

Co-finance resources should be decided and presented before CEO endorsement.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF/IS/17)**

12. Vietnam: PCB Management Demonstration Project [World Bank]

COMMENTS FROM JAPAN

Vietnam has capability on making PCB inventory. In this regard, the improvement of inventory will not be considered as necessary incremental cost for implementation of Stockholm Convention in Vietnam, and therefore, this should be covered by other co-finance resources instead of GEF grant. For gaining Japan's approval, this concern should be cleared in discussing and determining details of this project.

Building PCB analyzing capability is meaningful, since the capability will be serviceable for the effectiveness evaluation of Stockholm convention after commencing the first evaluation in COP4 in 2009.

However, it should be noted that, for promotion of appropriate control on PCB, it is more important to have educational project for workers, scientists, and technicians who use PCB than training on journalist and publicizing by media.

As STAP already mentioned, we are supportive of requesting advices from STAP before CEO approval.

COMMENTS FROM THE UNITED STATES

We are pleased to see the emphasis on enforcement in component 1 and urge the bank to apply an enforcement economics framework, which emphasizes addressing of weaknesses throughout the "enforcement chain," including, for example, the training of judges and prosecutors.

We appreciate the explanation of how this project is sequenced with others and the information on cost effectiveness. We would appreciate analysis of how the expected cost of \$1,4000 per MT of PCB oil (for storage) compares to the cost effectiveness of other projects that fund PCB storage.

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (REFERENCE TO GEF/IS/17)
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MULTI FOCAL AREAS

13. Tajikistan: Sustaining Agricultural Biodiversity in the Face of Climate Change [UNDP]

COMMENTS FROM FRANCE

The project concept is good, but rationale for activities and outputs definition, as well as project overall sustainability remain unclear.

Definition of activities and output.

Along with STAP remarks, several expected outputs are not convincing as providing efficient answers to agricultural biodiversity issues resulting from expected climate change. The project preparation should elucidate why farm-based adaptation practices (such as water harvesting, soil conservation, flood protection terracing, stress resistant local varieties) or improved agricultural and forestry techniques (improved cutting practices, improved grazing, wood-fuel farm planting), that the project wants to support, are not already used. Out of the information access, there is question on the cost/benefit of such technologies and how the project intends to overcome the possible information/technical/economical or institutional barriers which prevent such practices or techniques to diffuse.

Rationale and sustainability.

Development of new local varieties takes time and raises some questions on intellectual property rights toward the stakeholders who will develop such new varieties. The project should clarify in what it will not introduce inequitable bias in national agricultural biodiversity property.

Water harvesting or flood protection terracing generate maintenance cost and it is unclear how local beneficiaries will bare these new costs in the future, particularly if the expected benefit from biodiversity friendly products (on domestic or international markets) remain to be assessed within the project implementation itself (component 3). These benefits should be known before project inception and need to be assessed during project preparation.

The project will greatly depend on the resources provided by the microfinance scheme developed by the "US\$ 20 million Communities Program". As such the project preparation should clarify what are the expectations in terms of sustainability of this microfinance scheme. At least the main features of the business plan of this microfinance scheme, showing the

expected horizon for self sustainability of the microfinance activity (creation of a microfinance institution?) should be provided to demonstrate overall sustainability of the project outputs.

No objection subject to precisions provided.

COMMENTS FROM GERMANY

The project idea is highly relevant for preserving globally important agro-biodiversity as Tajikistan is a storehouse of biodiversity which is under increasing stress due to unsustainable land management.

Recommendation

Germany agrees to the project proposal. Changes outlined below should be made during further planning steps and during project implementation.

Comments

The incremental reasoning is weak: there is global interest in preserving Tajikistan biodiversity, but Tajikistan agriculture does rely as well on its own resources, as capacities to purchase external inputs are weak. In this context, we would like to underline that the budget set up is not convincing. A third of the budget comes from “in-kind” contributions from the GEF agencies. What are nature and source of these in-kind contributions? With regard to the extremely ambitious goals budget calculation needs to be realistic and without virtual accounting of resources already allocated elsewhere.

A number of important risks have not been taken into account appropriately:

- The implementation is relying on the Jamoat Resources Centers created by UNDP. While agreeing the need for improving local management structure, we have serious doubts about the capacity, local acceptance and sustainability of these structures. During further concept development a risk analysis with regard to JRC should be carried out and alternative options as well as measures to improve the local governance structure should be identified.
- Structures at national as well as at regional and local level in charge of policy formulation and implementation are extremely and increasingly weak. This constraint has not been addressed accordingly. Measures or adequate capacity building are needed. One element might be enhanced regional exchange with agro-biodiversity hot spots. India for example has developed innovative policy instruments in this field

COMMENTS FROM SWITZERLAND

General Commentaries

Switzerland fully recognises the importance of the proposed project's objective of sustaining agricultural biodiversity in the face of climate change. The project's design seems well embedded in the national policies and programmes and consistent with GEF's strategies and strategic programmes. The fact that the project will work very closely with the UNDP Communities Programme opens the possibility for synergies.

The PIF provides a rather good overview of the problems to be tackled and the solutions to be developed, and the three project components (policy and regulatory frameworks, institutional and individual capacities, market conditions) seem to be soundly combined. Nevertheless, at this stage of planning, we have identified several questions and challenges for the further planning which merit to be communicated.

Questions, Concerns and Challenges for further Project Preparation

Further attention needs to be given to the link of conservation and sustainable use of agro-biodiversity with adaptation to climate change.

Following the PIF, (a) land conversion to agriculture, (b) habitat degradation and species loss as result of overgrazing, (c) over-harvesting, and (d) climate change, are threatening Tajikistan's agro-biodiversity. However, unless the link between the conservation and sustainable use of agro-biodiversity with the adaptation to climate change is not systematically followed-up throughout the project's strategy, the project risks to remain a conventional approach to agro-biodiversity.

In order to address this link accordingly, among others, explicit attention should be given to: (1) an analysis of the vulnerability of the agro-biodiversity, and a description of its baseline to climate change, (2) the setting up of a monitoring system which links agro-biodiversity and climate change and (3) awareness-raising on this specific link.

Last but not least, if the monitoring system does not soundly link these two issues, the outcomes and global benefits in terms of conservation in the specific face of climate change will not be measurable.

Regarding the enormous diversity of varieties of global significance which are cultivated in Tajikistan, a prioritisation is warmly recommended.

Following the PIF, at present 1880 varieties of global significance are cultivated in Tajikistan, out of which most are widely used as food, forage, as technical and medical means, as well as for decorative purposes.

From our point of view and experience, this rich diversity is a risk for a dispersion of project efforts, unless clear priorities are established. Such a possible dispersion would affect the

project's impact and challenge its monitoring. Last but not least, the solutions to be found for each specific variety may be very different from case to case.

Specify the expected global environmental benefits and put further emphasis on concrete outcomes and outputs at field level.

The specified “expected outcomes” and “expected outputs” refer mainly to working processes.

In our interpretation there is still an open gap regarding the concrete “expected outcomes” and “expected outputs” at field level, which in terms of the GEF and of the CBD are the main interest. In the spirit of the STAP reviewer's comment, we underline that it is not enough to provide the necessary tools but to accompany as well the activities in the field.

Project monitoring and evaluation and the set-up of a sound indicator system.

So far, the project framework matrix does not explicitly describe the indicators.

We therefore warmly recommend giving further attention to the design of the project framework, incorporating outcomes and outputs and specifying indicators which refer explicitly to agro-biodiversity itself and its link to climate change.

Conclusions and recommendations

Without any doubt, climate change may seriously affect the country's agro-biodiversity, the stability of agro-ecosystems, crops and food security. Switzerland therefore fully supports the current project proposal.

However, despite the fact that the current proposal seems well integrated in the country's efforts and will closely work together with UNDP's Communities Programme, we feel that several concerns require further attention in the ongoing planning process.

Particularly we recommend putting further attention to:

- specifying systematically the link of agro-biodiversity and climate change (all over the project strategy: from problem analysis to solution),
- a prioritisation of the varieties of agro-biodiversity to be conserved,
- specifying further the expected global environmental benefits and giving more emphasis to the concrete activities at field level,
- the design of the monitoring system and the setting up of an indicator set which covers also measurable results and impacts at field level.