

COMPILATION OF TECHNICAL COMMENTS  
SUBMITTED BY COUNCIL MEMBERS ON  
INTERSESSIONAL WORK PROGRAM  
APPROVED IN AUGUST 2003

NOTE: This document is a compilation of technical comments concerning the project proposals presented in the intersessional work program approved by the Council in August 2003. These comments were submitted to the Secretariat by the Council members.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/9 – JULY 24, 2003)**

**General Comments:**

*Comments from USA:*

I am writing to convey the U.S. position on the July, 2003 Intersessional Work Program. At the outset, let me express appreciation to the GEF Secretariat and the implementing and executing agencies for the solid work program, which includes a number of innovative projects, and represents an excellent start to your leadership of the GEF. We continue to find the new summary document to be quite useful. We also welcome the increased use of performance indicators, although there continues to be room for improvement.

The U.S. supports the work program, with the exception of two project. In general, our review of the project documents focused on results measurement, and found that many of the indicators listed are “output” rather than “outcome” indicators. One project, “Mali: Biodiversity Conservation and Participatory Sustainable Management of Natural Resources in the Inner Niger Delta and its Transition Areas Mopti Are” needs considerable strengthening of indicators, and we ask that it be re-circulated to the Council prior to CEO endorsement. My staff will provide technical comments on this and other projects separately within the next two weeks.

Turning to specific projects, the U.S. is unable to approve at this time the “Building Capacity for Effective participation in the Biosafety Clearing House (BCH) for the Cartagena Protocol” project and would like to see it postponed until the November work program. Our goal is to work out the changes by September 12, which UNEP has indicated is the deadline for submission of projects to the GEF Secretariat for the next Council meeting. Between now and then, we will work closely with UNEP on changes to ensure the project has an open and transparent process, and that it is effective and timely in reaching its objectives.

The U.S. objects to the “Conservation of Iranian Wetlands” project “(UNDP)” and ask that this be clearly reflected in the CEO summary of Council Members’ views on the work program.

Our view of the project documents focused on result measurement. For all projects, the U.S. would like to see, consistent with the GEF-3 Replenishment Agreement:

- Baselines
- Quantitative target outputs and outcomes (or rates of change)
- Deadlines for when the target is expected to be achieved
- The identification of risks and provisions for risk mitigation
- A strong monitoring and evaluation framework
- Annual reporting of outcomes

Ideally, the outcomes will correspond with the targets set out in the GEF-3 Replenishment Agreement. In instances where the baseline is to be developed during

implementation, the document should at least offer some sense of the current baseline data an a timeframe (on a priority basis) when the full baseline will be developed.

Unfortunately, none of the projects in the work program met fully the replenishment standard on results measurement, although some were close (e.g., Consolidation of Ecosystem Management and Biodiversity Conservation of the Bay Islands). The U.S. requests that between now and CEO endorsement, all of the projects be improved in this regard, and would remind agencies that, beginning with the November work program, the U.S. reserves the right to seek a postponement of Council consideration of any project that does not meet the replenishment standard.

## **Biodiversity:**

### **Benin: Community-based Coastal Biodiversity Management Project (WB)**

#### *Comments from U.S.:*

This proposed project will implement priority community-based conservation activities, help establish a coastal zone management system and support livelihood and economic opportunities of the communities living in the coastal zone. GEF will help introduce alternative livelihoods to the local communities, emphasize long-term benefits of conservation of coastal assets and expand the national protected area system.

The project includes a monitoring and evaluation (M&E) component that will help to collect data and establish baselines on socio-economic and environmental criteria.

Project performance indicators include: increase in revenues and livelihoods from environmentally sustainable activities materialized and sustained beyond the project period; targeted communities voluntarily employing alternative livelihoods; and , sustainable modes of resource use identified in local development plans supported by the project. Also, indicators include improved trends in: knowledge, preservation and recovery of natural species; extent and composition of vegetation within coastal wetlands; pollution loads in river lakes, wetlands and coastal waters; and, abundance of key species stable or increase.

All of these performance indicators need specific baselines and specific quantitative targets. Also, the targets need to be “time-bound”. For example, need baseline data for revenue and measurements of livelihoods, quantitative targets or rates of range, and indication of when numerical targets will be reached. It is acceptable to be missing the baseline data when the baseline data is being developed as part of the project and as a matter of priority. Gathering baseline data can be a difficult task and so this often becomes an important component of the project going forward. In this case, however, we would expect to see at least targeted rates of change and specific years for when those targets will be reached. For example, we might see – “local population income will increase from X by 30% by 2007”.

Some of the indicators listed are more “output” indicators than “outcome” indicators. For example, the use of alternative livelihoods is a means for arriving at higher income generation. Although “identifying” modes of resource use is fine, there should be more specificity about what outcome will be achieved as a result – for example, this might lead to greater economic activity as measured by changes in income or GDP for the local region. Again, indicators should be measurable.

**Honduras: Consolidation of Ecosystem Management and Biodiversity Conservation of the Bay Islands (IDB)**

*Comments from USA:*

This proposed project is the second stage of the Bay Islands Environmental Management Program that supports ecosystems management and biodiversity conservation as well as environmentally sustainable tourism in the Bay Islands of Honduras. This program will strengthen the conservation of globally significant coastal and marine habitats and species.

The project includes a monitoring and evaluation (M&E) component which will include four categories of impact indicators: physical; economic; financial; and institutional. The IDB will conduct a mid-term review no later than 2 years after the first disbursement in order to assess, among other things, the degree of progress towards meeting the program's objectives and expected results.

Project performance indicators include: improve coastal water quality relative to 2002 baseline; increase annual visitation numbers (divers) relative to 2002 baseline; and, revenues from environmental management surcharge increase starting in 2004.

This is a well thought through presentation of performance indicators. However, it still needs specific quantitative targets or rates of change for the indicators, the targeted year, the target or rate of change expected to take place, and not just started, and baseline data. The summary does not really highlight the need for developing the baseline data as a matter of priority. It would be good to get clarity on how water quality will be measured.

*Comments from Switzerland:*

The project aims at the strengthening of the conservation of coastal and marine habitats and species of the Bay Islands, which are part of the Mesoamerican Barrier Reef System, the second longest barrier reef in the world. The Bay Islands are of the most populated and threatened islands in this system.

This Project is consistent with the OP2 (Coastal, Marine and Freshwater Ecosystem) and the overall program is well designed. It is intended to consolidate an important first stage of the environmental management program, financed by the IDB, and includes, in a consistent way, aspects of protection of areas, threat removal, sustainable use, participatory mechanisms for environmental management, and consolidation of financial sustainability of the management program.

In our review, no major concerns have been identified.

The following points are particularly positive:

- The program design seems to be based on a systematic local consultation process with stakeholders from the islands.
- The threats to biodiversity are well described and well addressed in the project strategy (including the impact monitoring).
- To ensure financial income to the departmental system of protected areas, the project will introduce a mechanism based on an entrance fee for tourists.

One aspect for further attention:

- Regarding the Governmental Executive Commission for Sustainable Tourism of the Bay Islands, which was created in the first stage of the program realized between 1998 and 2003, it is important to establish mechanisms to guarantee continuity of the management program of the Bay Islands in case of political changes / changes of its key representatives.

We fully support this project proposal and recommend its approval by GEF.

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**Iran: Conservation of Iranian Wetlands (UNDP)**

(no Council comments received)

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**Latvia: Biodiversity Protection in North Vidzeme Biosphere Reserve Project  
(UNDP)**

*Comments from USA:*

This proposed project aims to ensure conservation of globally significant biodiversity in the North Vidzeme Biosphere Reserve by integrating biodiversity conservation principles and practices into the planning, management and sustainable use of the Reserve.

The project contains an M&E component with indicators that are “both process and outcome”. Outcome indicators will be independently evaluated by experts and stakeholders. “Several” indicators will be measured against a baseline which will be considered in the first year of the project.

Project performance indicators in the summary include: by year 5, long-term conservation of biodiversity is rated as “ensured” of threat reduction to biodiversity conservation; by year 4, 80% of alternative income-generating activities supported by the project are rated as successful in terms of income generation and biodiversity protection; and, by year 5, the distribution of exotic species has been slowed down or halted.

Most of these indicators are “output” or process indicators. Need “outcome” indicators in this project in order for a good measurable performance framework. If conservation is the goal, then could measure changes in numbers of certain species or land mass. Not entirely clear if there are some economic benefits expected from this project also. If so, how expected to achieve> Need to measure income or GDP for the region/ Need baseline, quantitative targets and timeline.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
**(REFERENCE TO GEF/IS/9 – JULY 24, 2003)**

**Malaysia: Conservation of Biological Diversity through Improved Forest Planning Tools Project (UNDP)**

*Comments from USA:*

This proposed project aims to improve forest planning procedures, thus conserve biological diversity of tropical forest ecosystems.

The overall progress of the project implementation will be monitored through the National Steering Committee (NSC), of which the UNDP as the GEF implementing agency is a member. An International Advisory Panel will also be established to discuss in detail the technical aspects of the project and provide technical advice to the NSC on the project implementation and progress. “This will ensure that the outputs are relevant and result in the desired pragmatic applications.”

Project performance indicators include: independent evaluation concludes that biodiversity of area as a whole is higher than those of comparable sites; net financial benefits derived from the concession are equal to or greater than those from comparable sites.

Monitoring by an outside group may not be as effective as monitoring by local people, although doing both is acceptable. Would be worth clarifying who is involved in data collection and the setting of targets/goals. Need baseline data, quantitative targets and timeline. Indicators chosen re not easy to quantify, perhaps because they are too general.



**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
**(REFERENCE TO GEF/IS/9 – JULY 24, 2003)**

**Mali: Biodiversity Conservation and Participatory Sustainable Management of Natural Resources in the Inner Niger Delta and its Transition Area, Mopti Region Project (WB/IFAD)**

*Comments from USA:*

This proposed project aims to alleviate the incidence of poverty in rural households by increasing incomes and improving living conditions by expanding access to health care, education and food security. In particular, the project will focus on the protection and integrated management of biodiversity in ecosystems of national significance and also the restoration of the agro-pastoral and fisheries potential of the region through introducing biodiversity. The project will empower communities at the village level to identify their own priority needs and design micro-indicators.

An M&E system will be developed to measure project performance and environmental impacts. The system will include the definition of a baseline and the identification of clearly measurable indicators. An M&E expert will identify more precise project performance and impact indicators.

Performance indicators in the summary include: socio-economic indicators of the population dependent on natural resources (farmers, fishers...); number and distribution of water birds, fish and mammals; extent and state of flood plain forests inventoried, disbursement of funds.

Is the M&E expert a local person? Performance indicators should be identified already; shouldn't wait for the project to start implementation. Need baseline data, quantitative targets and timeline. The indicators give no sense that changes are expected as a result of project. Disbursement of funds is an input not a performance indicator.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/9 – JULY 24, 2003)**

**Mongolia: Community-based Conservation of Biological Diversity in the Mountain Landscapes of Mongolia's Altai Sayan Ecoregion Project (UNDP)**

*Comments from USA:*

This proposed project aims to mitigate unsustainable resource use practices such as overgrazing, inappropriate forest-use, and excessive hunting and will also aim to conserve biodiversity. The project will promote community-based management and conservation tools that empower herder communities to resolve forest and grassland management problems, conserve biodiversity and improve livelihoods.

There is an M&E component to this project. During the first year of the project, an information baseline on biodiversity condition and ecosystem health will be established. Project progress will be monitored using annual reviews and implementation milestones following UNDP rules and procedures. Two independent evaluations will be conducted of the project – one mid-term and one final evaluation.

Performance indicators include: beginning in year 4, stabilization and/or reduction in the levels of threat to landscape biodiversity in priority habitat areas and in priority protected areas compared to project start levels; condition of grassland in each pilot area maintained or improved over starting baseline through measurement of presence/absence of indicator species; and, similar condition or measurable improvement in forest and riparian quality by end of project.

Need baseline data, quantitative targets and timeline for all indicators. Some of these indicators do not lend themselves to easily being measured. Would have been useful to see performance indicator that also measures improvement of livelihoods such measures of income or GDP within the region.

*Comments from Switzerland:*

The proposal centers on the sustainable management of the mountain landscapes of Mongolia's Altai Sayan Ecoregion which appears to be increasingly threatened by grazing pressure from growing livestock herds, habitat fragmentation and poaching which also affects the legally protected areas of the region. The system approach adopted by the project is in line with progressive spatial land use planning philosophy combining people needs with long-term conservation objectives for an area that is rich in unique biodiversity, diversified landscapes and traditional lifestyles.

Project emphasis is on sustainable habitat conservation for flagship, keystone and threatened species such as snow-leopard, Argali sheep and large raptors. This is proposed to be achieved through (a) participatory land-use planning involving local stakeholders, (b) co-management agreements for land located in support zones and corridors of the existing protected areas, (c) strengthening the existing protected areas; (d) institutional strengthening on all levels, (e) enhancement of pertinent legal and policy framework, (f) capacity development for improved range use, and (g) environmental awareness building.

In general, the proposal complies with GEF's operational strategy in the focal area of Biodiversity and with the Operational Program 4 aiming at the protection of Mountain Ecosystems. The proposal appears consistent with GEF principles regarding stakeholder participation, capacity development and a holistic approach to integrated and sustainable land-use management. The overall project objectives are relevant and meet global and national priorities. Although the proposal provides sufficient scientific and technical background information to justify interventions in the Altai Sayan Ecoregion there is concern regarding the interventions as presented in the proposal.

### *Main Concerns:*

The semi-nomadic people of the very isolated target area that is characterized by extremely harsh climatic conditions have evolved with their livestock in harmony with wildlife over centuries. The culture of the typical pastoralists of this region has formed the landscape features of the Altai Sayan which has prevailed until today in spite of past attempts to settle people, provide alternative lifestyles and regulate land use. Traditional grazing pattern in the target area and the typical lifestyle of the herders have changed very little over time. Against this background the proposed interventions with focus on spatial land use planning and the resulting land- and resource use policies have to be assessed.

It appears that the proposed interventions are driven by traditional Western thinking patterns aiming at the conversion of Mongolia into a market economy with all its ramifications. This is reflected by the western standards applied to the "poverty" definition for typical herder families in the rural areas as described in the proposal. The Western definition of poverty ignores the fact that herder families which constitute the majority of the population in the target area have been self-sufficient for centuries living off their herds and the land without demands on western amenities and who will undoubtedly continue to do so without western interference. It therefore appears prudent to approach "assistance" to rural families with utmost cultural sensitivity and not to introduce market oriented thinking and profit maximization into a rural society that likes to maintain its traditional lifestyle and which is well adjusted to the extreme environmental conditions of the Altai Sayan Region. The alleged overall increase in livestock numbers over the past decade may already be the first indicator of the negative influence of a market-driven economy. Some of the activities proposed in this document may make it worse.

Although the proposal is well written it lacks depth and only insufficiently addresses the cultural uniqueness of the area. The proposed activities focus on plans, planning, policies and institutions rather than the people. Typically, the project does not provide any tangible benefits to the herders, except for the two CBNRM pilot projects which

unfortunately appear on the sideline instead of becoming the focal area of the project. Furthermore, the five year proposed duration is much too short to achieve the described targets.

In summary, it appears very doubtful that land use planning and new land use policies and co-management agreements according to “Western style” without offering tangible benefits will be successful in a rural society that has learned to be self-sufficient and to depend on each other for centuries. It is suggested that a stronger focus on the protection of existing protected areas and the enhancement of the current system of protected areas--the recognized “backbone” of biodiversity conservation- in combination with new CBNRM areas which allow for true equity sharing would be more sensible in the long run.

### *Conclusions and Recommendations:*

Although the project should be supported in principle, it is recommended to: (a) adopt a more practical approach for the proposed action program, (b) provide local people with tangible benefits (i.e., equity sharing from highly lucrative trophy hunting and sustainable forest utilization), (c) to place a stronger focus on sustainable protection of the existing protected areas and adding new protected areas, and (d) to create CBNRM areas that will provide tangible benefits to the people and at the same time benefit conservation goals.

### *Further Comments:*

Page 4, last paragraph: This should read “seral” not “serial” stages of vegetation.

Page 6: “trans-boundary migration” does not imply a” distance” per se

Page 6: Why call Argali a “keystone” species?

Page 8, paragr. 4: “Unemployment” rarely exists in a rural area in Mongolia. Misleading statement.

Page 8, paragr. 5: The statement of “poverty” related to the target area needs qualification. Poverty does not apply to the target area as stated. Western perspective on poverty does not apply here.

Page 9, “causes”: Is there supporting evidence that the number of herders is increasing? It appears that one of the key root causes that forced herders and their livestock into areas not used before --including protected areas--were several consecutive years of drought resulting in poor primary production followed by harsh winters which killed millions of livestock (See also page 10, paragr. 2).

Page 9, causes:...“economic instability as result of the ongoing transition process to a market economy”: that appears to be exactly the reason why a market economy Western style should not be promoted in this mostly Buddhist influenced culture.

Page 10, first paragr.: Please explain why there is “decreasing herder mobility”. Is this induced by the transition process and reforms wanted by the West (i.e., settling herders in central places in order to deliver education, provide social infrastructure and develop a market economy)?

Page 20 pp: It is commendable to form “herder committees”; but spatial land use plans are of limited value in an area where semi-nomadic herders change their locations more than 50 times per year!

Page 22, 1.3.3.: how to “train” people who are tending their herds and who are continuously moving?

Page 23, output 2: Highly ambitious and cannot be done within a five years project duration. Long-term monitoring appears more appropriate. Field surveys in the target area as proposed proved to be of little value in the past.

Page 24: Past census/research/wildlife census efforts resulted in highly biased outcome. Surveys in such extreme terrain are highly biased. Activity 2.2. What to do with all the field data collected? Without data storage and processing facilities data collection is of little use: not very practical, too theoretical.

Page 27. Activity 3.5: Why would local herders support this scheme without receiving tangible benefits? 5.1.1. What about allocating winter and summer pastures when “privatizing” or allocating land to individual families?

5.1.2: Micro-credits for what?

5.2: Good idea but is the central Government willing to delegate and would it be interested in true equity sharing (i.e., allowing herders to keep profit from selling licenses?).

Page 31, second bullet: to map “virtual” boundaries for community forests is easy, to make the government accept the implications and let keep communities the revenues is a different story altogether.

Page 35 UNDP-CCF: an economic transition and reforms imposed on Mongolia by foreigners and through external loans which increase the country’s foreign debts but contribute little to the real needs. The basic question is whether reforms and transition is really wanted by Mongolia and Mongolians.

Page 41, project outputs: 25% of GEF funds allocated to research: why so much?, 50% allocated to the elaboration of management plans (not to the implementation of the plans!): out of proportion; less than 5% of the total budget allocated to income generating opportunities: why so little? 15% of total budget spend on project monitoring and “lessons learned”: out of proportion. In summary, the budget appears very unbalanced.

Page 42: ...”Financial sustainability will be achieved for the PAs through the proposed “Trust Fund” expected to be fully operational by 2009..”: how realistic is this in a highly competitive global market; where numerous countries are trying to do the same thin hence competing for limited international funds available for that purpose.

STAP review: why would the re-establishment of traditional grazing systems not be appropriate?

**Pakistan: protection and Management of Pakistan Wetlands Project (UNDP)**

*Comments from USA:*

This proposed project plans to promote the sustainable conservation of fresh water and marine wetlands and their associated globally important biodiversity. The project will focus on four conservancies, using innovative public/private and community driven initiatives. It has a highly detailed logical framework that lists a large number of indicators (mainly output) with clear time framers.

Performance indicators include passage of legal and instructional framework, staff training, broadcasts for public awareness, etc. Most of the indicators are processed focused, rather than actual outcomes. Some indicators would benefit from greater quantification. Also, the log frame is so complicated that it is difficult to tell the important indicators from the minor procedural ones.

There is a monitoring and evaluation process but it does not appear to be spelled out in much detail. Also, it is unclear when the baseline will be completed.

Most of indicators are process or output indicators, not outcome indicators. How much area is expected to be placed under protection (or restored) as a result of the project? Not enough detail about the current baseline data, monitoring and evaluations and responsibilities.

*Comments from Switzerland:*

The proposal addresses the need for wetland preservation in Pakistan which appears to be increasingly threatened by resource over-use, habitat destruction and land alienation, lack of environmental awareness, lack of synchronized policy and management guidelines, poor law enforcement and weak line agencies. The principle root cause of the adverse impacts on the targeted wetlands appears to be poverty that characterizes the rural poor who largely depend on the wetland resources for subsistence. The scientific and other pertinent background information provided in support of the project and the description of the legal/administrative and socio-cultural framework conditions are sufficient in detail and content to appreciate the need for interventions aiming at the sustainable conservation management of the targeted wetland complexes.

The objectives for the project are clearly stated and the proposed activities are logically structured. The project complies with GEF's new Strategic Priority 2 that promotes mainstreaming of biodiversity and ecological considerations within the productive use of ecosystems for both commercial and subsistence purposes. The proposed interventions emphasize broad based integration of wetland conservation into the national, regional and local development objectives to be mostly achieved through capacity building, advocacy and awareness raising in a participatory approach. The project falls within the GEF Operational Program 2: Coastal, Freshwater and Marine Ecosystems.

Although the proposal is well researched, technically sound and well presented there are issues of concern that will be discussed as follows.

### *Main Concerns:*

The weakest links in the intervention package of the project appear to be: (a) the proposed stakeholder and community participation in the planning and management of the wetlands, (b) the proposed development of economic alternatives for the rural poor in the target areas, (c) the lack of integrated development plans (management plans) for the targeted wetlands, and (d) the financial sustainability of several project components. Although point (b) is considered critical for the much needed “buy-in” by locals into the project concept, it is highly doubtful that this may be achieved without concrete tangible and sustainable benefits to be derived from the project by the stakeholders. The proposed activities that promise to focus on the development of cottage industry, eco-tourism and the involvement of women, are rather vague, stereo-type, poorly researched and in the overall not very convincing. Furthermore, the funds allocated to these most important activities are comparatively insignificant. The proposal cross-references experience from similar projects in Pakistan but fails to recognize the need to custom-tailor programs and does not specify how this may be achieved.

The participatory approach that intends to involve communities and stakeholders in the planning and management process and that envisages the creation of “custodian communities” to be entrusted the responsibility for the proposed conservation management of the target areas sounds good in theory but the proposal does not convincingly prove how this may be achieved. It is self-evident that the overall success of the project is at high risk if the communities and stakeholders will not develop ownership. It is not clear why the communities are expected to develop ownership if their traditional resource- and land user rights will be curtailed by the project without providing incentives/anything in exchange. How can the project offer the promised “win-win” situation for stakeholders.

The proposal does not address the need for comprehensive integrated management plans for the four selected wetland complexes (long-term perspective) although the project summary clearly states the need for “*progressive, participatory management plans for the four independent demonstration sites*”. Instead, the proposal suggests the elaboration of an “immediate action plan” for each of the areas (short-term perspective), which indicates a “brushfire approach” without providing long-term solutions to the problems.

### *Conclusions and Recommendations:*

Although the project is worth supporting, the proposal would greatly benefit from a more defined focus on sustainable economic development of affected stakeholders to be based on sound, feasible and innovative pilot projects. Furthermore, mechanisms have to be defined which guarantee tangible benefits over and above the current benefits the stakeholders derive from the target areas. Also the project should make provisions for budget allocations and special expertise required to design and implement integrated management plans for the four demonstration sites.



*Further Commentaries:*

**Paragraph 33:** The idea of establishing community run “conservancies” is excellent; the proposed equity sharing scheme however needs clarification. What will be the actual benefits to the affected communities/stakeholders over and above the current traditional use rights?

**Paragraph 38-40:** The proposed centralized equipment center does not appear practical or feasible. Furthermore, the equipment needs should be itemized and justified; owned and to be operated by whom?

**Paragraph 48:** A national wetland survey: why dilute the project and not concentrate on the four selected demonstration sites?

**Paragraph 58:** Output 3.2 appears much too ambitious and is kept much too general. It appears more logical to start with a training need assessment by target group before designing training modules and programs. Training should be demand-driven. The training program appears overly ambitious and complex.

**Paragraph 96:** Who will deliver the awareness building campaign?

**Paragraph 110:** It is unclear how hunter education/awareness building can be delivered unless hunters undergo mandatory training courses before obtaining a hunting license/permit. The same applies to the training of several other referenced target groups.

**Paragraph 116:** To establish a website is an excellent idea but who will maintain the site on completion of the project?

**Paragraph 122:** The proposed fund-raising by a professional is an excellent idea; but funds to be located should focus on the demo sites rather than the entire country and institutional framework.

**Paragraph 132 and 142:** Who will train the “Site Management Teams” for the four target areas and how will they be sustained financially after project termination?

**Paragraph 148 (also 174):** It is unclear how the project will achieve the required “buy-in” by stakeholders without providing tangible benefits over and above the current benefits derived from the four target areas and without providing incentives outweighing the losses expected from use restrictions.

**Paragraph 151:** Training villagers to service tourists is of little use without a proper opportunity and market assessment that would identify realistic needs (equally applies to all four areas).

**Paragraph 157:** Who is the “PWP”? The bird-ringing should involve locals to be remunerated for their assistance. This also would help to develop much needed ownership.

**Paragraph 163 (and 207):** Captive crocodile/ghorial breeding is a highly sophisticated and costly exercise that requires special skills. Who would provide training to whom and how can the facilities be sustained? Would the expected results justify the effort?

**Paragraph 192-193:** Who exactly will be responsible for the assessment, training and provision of seed money and for which revenue generating pilot projects?

**Paragraph 204:** Please explain the purpose of the annual surveys of the Indus Dolphins. Are the surveys to continue on termination of the project? Please properly justify this activity.

**Paragraph 210:** Experimental hog deer breeding for re-introduction purposes makes little sense without solving the root problems responsible for the population decline.

**Paragraph 213:** If all target wetlands are privately owned what would be the incentive for owners to change current system?

**Paragraph 232:** Why would the community be interested in a “conservancy” if the land and resources are already community owned?

**Paragraph 236:** Please provide a proper justification for the construction of enclosure plots. Why not just develop a realistic rehabilitation/use plan for over-grazed areas? What would enclosure plots add or prove?

**Paragraph 241:** Will the project pay for the labour involved?

**Paragraph 292:** To establish “Custodian Communities” without proper incentive system appears unlikely.

**Paragraph 293** The financial sustainability is doubtful.

**Paragraph 312:** The assumption is made that “economic benefits begin to accumulate in wetland dependent communities” as result of the project. This is not very convincingly proven by the proposal.

**Paragraph 314:** According to the cost-table no funds appear to be allocated to two of the four sites (i.e., Salt Range and North-West Alpine Complexes). Why not?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
**(REFERENCE TO GEF/IS/9 – JULY 24, 2003)**

**Tunisia: Gulf of Gabes Marine and Coastal Resources Protection Project (WB)**

*Comments from USA:*

The purpose of the project is to protect biodiversity in the Gulf of Gabes at three priority pilot sites and identify resources needed to reverse the current trend of biodiversity degradation.

Performance indicators include biodiversity conserved in a sustainable manner, number of jobs and revenue generated in ecotourism. A number of baseline studies are expected to be conducted throughout the project. Six management plans based on participatory principles, with communities involved early in the process. There is no description of a monitoring and evaluation plan.

Needs a specific target outcomes in terms of area protected, jobs created, income generated, and wildlife population. Why is baseline data not available until Y3? Need clear monitoring and evaluation framework.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS**  
**(REFERENCE TO GEF/IS/9 – JULY 24, 2003)**

**Global: Building Capacity for Effective Participation in the Biosafety Clearing House of the Cartagena Protocol Project (UNEP)**

(requested for resubmission to the November 2003 Work Program)

**International Waters: Regional (Indonesia, Malaysia): Marine Electronic Highway  
Demonstration Project (WB)**

*Comments from USA:*

This project is the first phase of a potential two-phase program aimed at improving the efficiency, safety and environment sustainability of marine transport through the Straits of Malacca and international sea lanes. The project will establish an electronic navigational system and install equipment on at least sixty large oil tankers and fifty large containers vessels that regularly transit the Straits, and as many as possible of the larger local vessels. The project includes an evaluation of the feasibility and benefits of a larger system covering the entire Straits. It also includes a study of a potential marine environment fund.

What is the baseline? Number of accidents in the area? Severity of spills?  
Environmental quality of coastal waters? What is the targeted outcome compared to baseline?