



# Global Environment Facility

September 10, 2007

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COMPILATION OF TECHNICAL COMMENTS  
SUBMITTED BY COUNCIL MEMBERS  
ON INTERSESSIONAL WORK PROGRAM  
APPROVED BY COUNCIL ON SEPTEMBER 5, 2007

NOTE: This document is a compilation of technical comments submitted to the Secretariat by Council members concerning the project proposals presented in the July 2007 Intersessional Work Program approved by the Council on September 5, 2007.

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**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/16)**

**GENERAL COMMENTS**

***COMMENTS FROM GERMANY***

The Executive Summaries of all the project proposals exceed the recommended length of 10 pages considerably. This makes project review complex and time-consuming. This is a problem with the current form of presentation of project documents of all the GEF agencies that hasn't been solved up to now. We are therefore looking forward to receiving the new and – hopefully – much shorter PIFs in the future!

***COMMENTS FROM THE UNITED STATES***

**Text of Letter to the GEF CEO from the United States dated August 30, 2007**

“On behalf of U.S. Council Member Kenneth Peel, I am writing to convey the United States' position and comments with regard to the five projects that you forwarded to the Council earlier this month as part of the intersessional work program.

With regard to the project **Nile Transboundary Environmental Action Project**, I would like to express the United States' support for the project's goals. However, this project will provide support to Sudan. As such, due to policy concerns relating to states that provide support for international terrorism, we request that the United States be recorded as opposing this project.

We can support the other four projects, but we request that the GEF agencies and Secretariat take the attached set of comments into consideration in the further design and review of these projects. We thought that the Ningxia biodiversity project and the Canary Large Marine Ecosystem projects are both ambitious and well designed. We believe, however, that the other projects could be improved further as the outcomes are not clear in some cases.

We also wanted to pass on a comment regarding the focal area strategy for biodiversity as it pertains to the project **Conservation and Sustainable Use of Cultivated and Wild Tropical Fruit Diversity: Promoting Sustainable Livelihood, Food Security, and Ecosystem Services**. We recognize that this project was developed under the GEF's Operational Program 13 on agricultural biodiversity and that the GEF's new focal area strategies only came into effect this month. We question, however, whether this type of project should qualify in the future as a mainstreaming project. Mainstreaming projects have generally focused on integrating wild biodiversity in to productive landscapes, rather than agricultural biodiversity. Moreover, the linkages to Strategic Program 4 (Strengthening Policy and Regulatory Frameworks) is tenuous and the project does not seem to fall under Strategic Program 5 (Fostering Markets for Biodiversity Goods and Services). We would appreciate it if the Secretariat could clarify its

intention as to whether agricultural biodiversity projects will be considered mainstreaming projects in the future.

Thank you for your continued efforts.”

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/16)**

**BIOLOGICAL DIVERSITY**

**1. Regional: (India, Indonesia, Malaysia, Thailand): Conservation and Sustainable Use of Cultivated and Wild Tropical Fruit Diversity: Promoting Sustainable Livelihoods, Food Security and Ecosystem Services [UNEP]**

***COMMENTS FROM GERMANY***

1. We fully support the project proposal. Just two remarks:
  - Annex E is missing
  - Cooperation with German TC projects would be positive; for example in Thailand the GTZ-project “Enhancing competition and eco-efficiency”.

***COMMENTS FROM THE UNITED STATES***

2. We note that the four countries see this project as a priority as they have allocated funding to it from their allocations under the Resource Allocation Framework. This project also seems fully consistent with UNEP’s comparative advantage.
3. The document seems to overly emphasize the documentation and sharing of knowledge, meetings, “developing best practices,” and creating networks of researchers. Consideration should be given to increasing the training component. It is also not clear whether the researchers involved will be able to affect markets and enhance livelihoods.
4. The global environmental benefits from this project are unclear because it is unclear how the activities proposed will result in biodiversity or ecosystem conservation. The proposal talks about “mechanisms” and “good practices” to increase the value of sustainable management of forest species/wild relatives of target crops and contribute to increasing tropical fruit tree diversity or to decreasing erosion of that diversity. But it does not specify what these mechanisms will be. The proposal needs to elaborate on this further.
5. The project mentions “certification schemes,” but it is not clear what such certification schemes are available for these fruits. How they will create incentives for better management and conservation of wild and cultivated fruit diversity? Will these schemes be for local or international markets?

6. There is little discussion of the private sector and market systems for these fruits. There do not seem to be any private sector partners. The document should further elaborate on market linkages.

7. We are pleased that the project incorporates measurable socioeconomic indicators and sets targets in this regard, which is consistent with the indicators for mainstreaming projects. But the number of farmers to be affected is small and a 10% increase in income for them probably will not provide sufficient incentive to change practices. Knowledge and best practices alone will not produce these results.

8. The document also sets spatial targets. We are not sure, however, whether these indicators (and the socioeconomic ones) are sufficient proxy indicators for assessing whether the project objective – conservation of fruit tree diversity – will be achieved.

- We believe the project should set a baseline at the project outset to measure the actual extent of diversity of the fruit trees present and then assess at project completion the extent to which this diversity is conserved.

9. The number of representatives of user groups in each country to be training in certification schemes (10) seems small and it is unclear if training user groups in certification schemes would have any impact on the market. Please elaborate on this further.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/16)**

**2. China: Ningxia Integrated Ecosystem and Agricultural Development Project [ADB]**

***COMMENTS FROM GERMANY***

10. The project financing plan consists of an ADB loan project of \$100,000,000, a contribution by the Chinese government of \$110,730,000, which is an impressive ratio of co-financing compared to the \$5,000,000 GEF requested funds.

**Recommendation**

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

- (a) The proposed participation mechanisms seem to more passively than actively involve the local population. We recommend implementing well established methods such as participatory technology development instead of just instructing smallholder farmers/poor rural people from ethnic minorities as Hui people to adopt new agricultural practises that have been designed for, but not with them.
- (b) Apart from maintaining wild biodiversity, it should be paid more attention to animal (and plant) genetic resources: We recommend performing an environmental impact analysis when promoting agricultural industrialization. The activity "improving genetic quality" of cattle should therefore make sure to maintain genetic diversity.
- (c) We found inconsistencies in table 1 (in executive summary) on "proposed GEF investment by GEF strategic objective": The left column states the issue of indigenous peoples involvement which is not reflected in the right column (proposed GEF project activities", only in annexes of the main document. The left column also mentions the issue of access and benefit sharing which is not reflected in the text of right column either.
- (d) The difference between domestic and global benefits does not always become clear. Output 3 referring to improve rural livelihoods does not contain any global benefits, which could be altered by the preservation of animal genetic resources (see above).

## ***COMMENTS FROM THE UNITED STATES***

12. This seems to be a well designed project, and we support the linkages between biodiversity and land degradation. The focus on water conservation and wetland rehabilitation and conservation are particularly important. We also believe this project falls within the ADB's comparative advantage.

13. The results framework is robust as it incorporates targets and baseline information in most cases. We were pleased to see the attention given to ensuring adequate environmental flows to lakes and wetlands. (See page 3: "nine lakes and wetland systems will receive increased water allocations.") However, there is no baseline information provided in the logframe on current allocations to these waterbodies. Rather, it refers to "balanced water allocation."

- What does "balanced" mean?
- Also, how will the project ensure that water allocations increase because of the project, and how will this be enforced?



**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/16)**

**INTERNATIONAL WATERS**

**3. Regional (Burundi, Congo DR, Egypt, Ethiopia, Kenya, Rwanda, Sudan, Tanzania, Uganda): Nile Transboundary Environmental Action Project (NTEAP), Phase II [UNDP]**

*COMMENTS FROM GERMANY*

14. Germany supports the project proposal without a need for further comments.

*COMMENTS FROM THE UNITED STATES*

15. This project falls within UNDP's comparative advantage. The United States supports the objective of this project to enhance cooperation among Nile basin states and hopes that the project will make a solid contribution towards the goal of ensuring the sustainable and integrated management of this important river system.

16. This project focuses almost entirely on process issues, but the project is not particularly clear what with regard to its key objectives and targets. This could be better defined. There is a plethora of process indicators listed, but it is difficult to understand how they cumulatively add up to a clear overall objective.

17. The project does give attention to pilot projects, environmental assessments, and wetland conservation efforts. In some of these cases – such as wetland conservation, water flow, and water quality – it would have seemed possible to develop outcome targets and indicators, but none are provided. Would it be possible to define quantifiable targets?

18. We question why the indicator with regard to transboundary environmental impact assessment guidelines (page 24) is limited only to Nile Basin Initiative (NBI) projects, and not all development projects that have a transboundary impact. It is accepted international practice that countries on international watercourses follow certain procedures for projects with transboundary impacts (e.g., notification, consultation, etc.), so it would not seem difficult to require transboundary environmental impact assessments for projects with significant impacts in this regard.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/16)**

**4. Regional (Cape Verde, Gambia, Guinea, Guinea-Bissau, Mauritania, Morocco, Senegal): Protection of the Canary Current Large Marine Ecosystem (LME) [FAO/UNEP]**

***COMMENTS FROM GERMANY***

19. Germany supports the project proposal without a need for further comments.

***COMMENTS FROM THE UNITED STATES***

20. This project falls within the comparative advantages of FAO and UNEP as recently agreed by Council. The goal of this project – to place the Canary Current LME under more sustainable management so that depleted fisheries can recover – is extremely important from both an environmental and poverty reduction perspective.

21. While we understand that the project is meant to be process related, the goal is to improve the sustainability of fisheries. We question why there is no baseline information or indicators or targets related to the status of the fishery. We would have thought that the project planning grant would have supported studies to collect baseline information in this regard.

22. The document, as written, needs to be strengthened in two additional areas:

- (a) The document needs to emphasize more clearly that management actions under the governance mechanisms and arrangements to be set up by the project will be based on science and transboundary assessments and methodologies.
- (b) In addition to the governance mechanisms to be set up, the project needs to take into consideration integrated assessments in productivity, fish and fisheries, pollution and ecosystem health, socioeconomic benefits.

23. The United States believes that joint cruises to assess the fish stocks and the ecological condition of the Canary Current LME are an important component of the project. We believe such cruises should include researchers from all the countries involved in the project. Prior to CEO endorsement, the United States would like confirmation that the planned joint cruises will include researchers from all the countries.

**INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE TO GEF/IS/16)**

**5. Mexico: Integrated Assessment and Management of the Gulf of Mexico Large Marine Ecosystem [UNIDO]**

***COMMENTS FROM GERMANY***

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

25. The Mexican Gulf is bordered by five states of the United States of America and six Mexican states. Approximately 55 million people live in the coastal states of the Gulf, 40 million in the USA and 15 million in Mexico. The Gulf of Mexico is a major asset to both countries, in terms of fisheries, tourism, agriculture, oil, infrastructure, trade and shipping. As Mexico and the United States of America both are requesting countries and both are benefiting from this project, this should also be documented clearly in the Executive Summary of the Project Proposal.

26. Also, the estimated costs for the project have to be outlined in a consistent way. The figures concerning the "Total Project Financing" on pages 1 and 16 are not yet consistent and should therefore be reviewed.

***COMMENTS FROM THE UNITED STATES***

27. This project falls within the comparative advantage of UNIDO as recently agreed by Council. We appreciate the fact that United States' support for this project, including co-financing, is noted in the document.

28. As written, the document does not sufficiently explain how the project will support a transboundary ecosystem-based approach to management of the LME. This point should have greater emphasis in the text. Moreover, there should also be greater emphasis on how management decisions will be based on science. The science based ecosystem approach should consider the recovery and sustainability of the goods and services of the Gulf of Mexico LME, including productivity, fish and fisheries, pollution and ecosystem health, socioeconomic benefits, and governance mechanisms.

29. The results framework does not seem to be consistent with the GEF's monitoring and evaluation policy. For instance, the section for outcome three does not contain baseline data for the three pilot projects and there are no targets or measurable indicators.