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COMPILATION OF TECHNICAL COMMENTS
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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 Work Program approved by the Council on November 13, 2008.

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**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

BIODIVERSITY

1. Regional (Bahamas, Belize, Grenada, Guyana, Suriname) : BS Implementation of National Biosafety Frameworks in Caribbean Sub-Region Countries of Bahamas, Belize, Grenada, Guyana and Suriname in the Context of a Regional Project [UNEP]

COMMENTS FROM FRANCE

1. The project's objective is to extend a regional project implementing National Biosafety Frameworks for Caribbean sub-region.
2. It develops a standard approach, already approved by the GEF to a new set of countries (Bahamas, Belize, Guyana and Suriname) now eligible. Accordingly, the project doesn't raise specific question or reserve.

Opinion: favorable

COMMENTS FROM GERMANY

3. Since the proposed project extends the number of countries participating in the regional biosafety project submitted to the last council meeting in April 2008, Germany would like to maintain the following comment on the PIF (GEFSEC Project ID 2967) submitted by seven countries of the Caribbean sub-region for the Council meeting in April 2008, to which the project ID 3735 is an extension.
4. The project seemed to be based upon the outcome of regional processes and project undertaken by organisation as the Inter-American Institute for Cooperation in Agriculture (IICA) and the Caribbean Agricultural Research and Development Institute (CARDI). Both of them were mandated by the CARICOM Heads of Governments to develop regional policies on modern biotechnology and biosafety in the context of a Caribbean free market agreement.
5. Germany would like to stress that the objective of the Cartagena Protocol refers to the protection of biodiversity and human health. There had been considerable concerns and debates concerning the relationship between trade and the protection of the environment and health during and after the development of the Cartagena Protocol. To reflect the outcome of these discussions and to ensure that the Cartagena Protocol is fully implemented in the Caribbean sub-region, Germany would like to make following recommendations:

- The project must be developed and executed in close cooperation between the Ministries for Agriculture and for Environment because both harbour biosafety responsibilities and competence in the Caribbean countries.
- If a regional biosafety framework in the context of the free-market policy of the Caribbean Single Market and Economy of the CARICOM is going to be funded by the GEF, it must be ensured that both, the interests fostering a common market and those promoting the protection of the environment, biodiversity and human health are equally represented in the project development and execution.
- One means to ensure the balance of interests is to engage a broad range of stakeholders in the development and execution of the project.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

2. Regional (Congo DR, Congo) : CBSP Catalyzing Sustainable Forest Management in the Lake Tele-Lake Tumba (LTLT) Transboundary Wetland Landscape [UNDP]

COMMENTS FROM FRANCE

6. This landscape is the world's largest swamp forest. That is the reason why the objectives of the project are relevant. Nevertheless, there is an important difference between the threats in DRC and in Congo. The risk of degradation seems much more important in DRC than in Congo related to the human density in DRC. The project should have to take into account this difference.

Favorable opinion subject the above consideration.

COMMENTS FROM GERMANY

7. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

3. Brazil : Improving Brazilian Capacity to Conserve and Use Biodiversity through Information Management and Use [UNEP]

COMMENTS FROM FRANCE

8. The project aims to improve information management regarding biodiversity at the national level. It proposes to focus its attention in particular on the taxonomic capacities of Brazilian organizations.

9. The approach proposed is interesting but one can wonder about the time it will take for its measures to produce concrete results and help decision makers to mainstream biodiversity in their decisions.

10. Turning to the partners involved, the project should clearly work with international partners of Brazil supporting the country's efforts to protect its biodiversity and developing important knowledge based activities : international NGO for example.

11. The project should make more space also for the relevant organization at State level (and not only Federal level) working on biodiversity. These organizations will be needed to feed the information system. They will be users also of the tools developed.

Opinion: Favorable with a request to address the above questions.

COMMENTS FROM GERMANY

12. The project objective and the planned activities are well formulated and clear. The risk analysis (Part F), the comments of the STAP review, and following recommendation should be taken into account during further elaboration of the project document.

- Component 1 of the project considers the systematization of the information of all - or several (it is not specified) - collections of the country in herbaria and museums. However, there are divergent positions within the academic community and managers of these collections, on the free access to the information via Internet. Therefore it would be interesting, if the proponent ministry (MCT) could certify the will of the societies and managers of the collections to share their information in this way, if necessary by signing letters of intent.
- The objective of component 3 is to make this information available to decision-makers. In this regard it should be reminded that the Ministry of the Environment

is the main source of environmental information for decision-makers, inside and outside the government. Although there is a lot of high quality information in the universities, research institutions, and the Ministry of Science and Technology, this knowledge is neither fully integrated nor shared, with the MMA, as highlighted in the project text itself. Therefore it would be recommendable that the proponent MCT enters into a dialogue with the MMA, on how the information could be shared and be integrated, or how to avoid the overlapping with the biodiversity information systems developed in the MMA, as the System of Authorization and Information in Biodiversity - SISBIO, the System of Taxonomic Information - SISTAXON, the System of Biodiversity Monitoring (SIMBIO), and the System of Information of Biodiversity (SINABIO).

- In components 1 and 2, the project aims at improving the infrastructure and information systems in biological collections, and to invest in strengthening the research (field and laboratory research), and training of staff specialized in taxonomy. However, most scientific collections in museums and herbaria of Brazil are in need of investments (for construction of new buildings to contracting guards and technicians, or for maintenance of the collections). Also the research institutions and post graduate courses in zoology and botany, in different geographic regions of the country, have certain weaknesses and deficits regarding the resources for maintenance and expansion, scholarships or research programs or for contracting taxonomists. Soon, it would be interesting if the proponent could indicate which types of activities and geographic regions will be prioritized.

COMMENTS FROM JAPAN

13. Japan proposes that two points should be considered:

- How to ensure incentives to data providers.
- How a standard should be set in disclosing information regarding rare species distribution map, protection information.

COMMENTS FROM SWITZERLAND

General Comments

14. The risks associated with the proposed project appear to be much higher than indicated by the PIF. Although it would be very desirable to have one consolidated data base for the entire country the overall project goal will be extremely difficult to achieve. Would it not be more appropriate to test the feasibility of such a mammoth undertaking on a one-state basis instead (to serve as a trial)? The requested GEF grant of \$ 8 million appears much too high for such a risky project.

Questions, Concerns, Challenges and Suggestions Related to Project Preparation

- No timeline is provided for the project.
- Where does the “indicative” co-financing of \$20 million come from, and what would it be used for?
- It is well known that Brazil’s States work rather independently; what would motivate States to feed data into a centralized agency?

Conclusions and Recommendations

15. Key questions have to be answered prior to a tentative approval of such an ambitious but very risky project.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

**4. Cape Verde : SPWA-BD Consolidation of Cape Verde's Protected Areas System
[UNDP]**

COMMENTS FROM FRANCE

16. The project's objective is to foster and enlarge the creation of a Cape Verde's Protected Area System.

Opinion: Favorable, with the following questions and remarks to be taken into account during project preparation:

17. The project preparation should care to integrate both terrestrial protected areas and marine protected areas, particularly by developing and Integrated Coastal Zone Management approach.

18. Although the project is part of the GEF's West Africa Strategic Program, the integration of a regional vision or approach is not clear in the current project.

19. The cofinancing with the WWF's "Marine and Coastal Conservation Project" is welcomed, particularly as it is only one component of a larger multi-NGO program (WWF, FIBA, IUCN and Wetland International) toward the protection of coastal and marine areas conservation in West Africa.

20. This program is also working in close relation with the Sub-regional Commission on Fisheries in order to integrate marine protected areas with fisheries management at the regional level, which is also supposed to benefit from a large GEF assistance which is not recorded in the present PIF.

21. Synergies between this Cape Verde Projects and all regional programs should be developed in order to increase cost-effectiveness of Cape Verde's PA system development.

COMMENTS FROM GERMANY

22. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

5. Congo DR : CBSP Enforcement of Protected Areas Network [World Bank]

COMMENTS FROM FRANCE

23. The strengthening of the DRC's Protected Areas system is relevant taking into account the weakly governance system in DRC. The Protected Areas selected as pilot are the most treated in term of biodiversity (Maiko, Virunga, Garamba).

24. The FFEM is funding a project in the Maiko-Tayna-Kahuzi Biega landscape that should be strongly connected with the GEF project.

Favorable opinion subject the above consideration

COMMENTS FROM GERMANY

25. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

6. Equatorial Guinea : CBSP Sustainable Forest Management in Equatorial Guinea for the Conservation of Representative Ecosystems and Globally Significant Biodiversity [UNDP]

COMMENTS FROM FRANCE

26. In term of biodiversity, the objectives of the project are relevant but the difficulties with governance system in Equatorial Guinea need a special attention to the institutional framework supported by the project, with a special attention to the local community participation.

Favorable opinion subject the above consideration.

COMMENTS FROM GERMANY

27. The project aims at strengthening the National Protected Area system and is not a Sustainable Forest Management Project. The project title should be revised. Expected outcomes seem ambitious, given the short (3 year) project implementation period, the multi-level character of the project and its dependency on several co-financing sources. Proposed changes in national policies, PA management and financing as well as community participation in PA co-management typically require more time, especially given the current lack of capacity in NIPA. The proposal does not elaborate on how the policy level, capacity development and local implementation activities can be effectively linked to ensure that a consistent approach is applied at all levels. An extension of the proposed project implementation period should be considered as an option to address these issues. Project outcomes should include a long-term funding strategy of the NSPA. Links with regional COMIFAC initiatives should be more clearly developed to show the project contribution to the regional COMIFAC convergence plan. Risks associated with high levels of expected national co-funding seem considerable and should be addressed during further project preparation.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

7. Ethiopia : Mainstreaming Agro-biodiversity Conservation in the Farming Systems of Ethiopia [UNDP]

COMMENTS FROM FRANCE

28. Following the first GEF project dealing with agro-biodiversity in Ethiopia, the FFEM is funding a new project focused on home-garden products.

29. The GEF project will have to build strong links with the FFEM project which the objectives are similar. It will be useful to define a practical framework to strengthen the links between these projects.

Favorable opinion subject the above consideration.

COMMENTS FROM GERMANY

30. We commend the valuable STAP comments, especially their cautious judgement regarding the establishment of PES schemes. Five years are a relatively short time period for introducing the necessary behavioural and institutional changes for a sustainable scheme considering that past efforts in the region failed due to an institutional environment, which is still much weaker than e.g. in Latin America. The following comments should be taken into account when developing the proposal.

31. There are two sources of important information, which will help to better develop the strategies for two agrobiodiversity crops:

- Teff has been the object of an ABS agreement between Ethiopia and a Dutch firm. It will be important to consider this example when evaluating strategies to increase the value of agrobiodiversity resources. A complete documentation on the existing ABS-Teff Agreements can be found under:
http://www.abs-africa.info/bioprospecting_cases.html (-> Ethiopia).
- Coffee forests and native coffee in Ethiopia are the research topics of an excellent long-term research project of the German Federal Ministry for Education and Research. They not only evaluated the genetic variability of coffee but also undertook cost-benefit analysis, supported certification procedures and established a multi-stakeholder forum. Information can be found under:
<http://www.biota->

africa.deica.de/spier_profina1_ba.php?Page_ID=L975_13&PHPSESSID=9f955f1c4b44f470f065e196c1baa6fb , presentations 6.1 to 6.5.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

8. Jamaica : Strengthening the Operational and Financial Sustainability of the National Protected Area System [UNDP]

COMMENTS FROM FRANCE

32. The project's objective is to foster the Jamaica's Protected Area System and to establish sustainable financing mechanisms for long term biodiversity conservation.

Opinion: Favorable

COMMENTS FROM GERMANY

33. An important co-financing for this project is 1 million Euros from KfW. The source of this funding is a regional fund which is still in construction; the criteria for disbursements have not been developed yet.

34. Germany supports the development of the PIF into a full project proposal under the precondition that the co-financing is secured in the stated amount (with or without the KfW contribution).

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

9. Mali : SPWA-BD Expansion and Strengthening of Mali's PA System [UNDP]

COMMENTS FROM FRANCE

35. The project concept is raising several concerns and the project overall sustainability remain unclear.

Opinion: reserved until the following questions and remarks are taken into account during project preparation:

36. The project is promoting the extension of the Malian PA system, while there is already some lack of capacity and resources to adequately manage the existing PAs. Project government contribution from the DNCN of 1,6 Million \$ to this project (toward the Bafing Faleme region) is surprising as other PA, which are supposed to be maintained by the DNCN, are critically lacking such kind of financial support.

37. The political will to clearly protect the Bafing Faleme area is not demonstrated. As a matter of fact, this area is not yet recognized as a Biosphere reserve, while the process was engaged for more than 3 years without any progress so far.

38. The project is not correctly assessing the threats on the area: the most important threat to the Bafing Faleme area is the cotton development and the conversions of increasing space to agricultural use. The project don't take into consideration the Malian cotton development strategy which identify this region, and in particular the western part of the Bafing Faleme complex, as the new pioneer front for cotton development. This probably explains why the process of recognition of this area as Biosphere reserve is in a stalemate for several years now.

39. The overall sustainability of the extension proposed is expected to be supported by eco-tourism development. The potential for increase of ecotourism is unrealistic to finance the huge space that the project is willing to protect, particularly considering the difficulty of access to this Bafing Faleme region. The overall business planning of this intervention should be a prerequisite instead of an activity of the project.

40. The project is also expecting a major cofinancing of 1 Million \$ from the private Mali Faune Aventures company. Previous contact whit this company raise some concerns in terms of credential in terms of professionalism and even the capacity to leverage the 1 million \$ committed. The preparation should thoroughly assess the capacity and financial surface of this company before to confirm GEF cofinancing.

41. To end, at the contrary to what is indicated in the PIF, the FFEM was never invited to cofinance this project and the 500.000 \$ Grant is not committed by the FFEM.

42. As a conclusion, **one prerequisite before to continue the instruction of this project** could be to suggest the government (DNCN) to use its new increased resources of 1,6 million \$ to demonstrate its strong political will to protect this region by:

- firstly, providing the necessary means to graduate (previously to this project) the recognition of this region as a Biosphere reserve;
- Secondly, finalizing the Mali's National Protected Area Strategy with a special attention in clarifying at top political level how the cotton development area will be delimited in order to avoid entering in the new Bafing-Faleme biosphere reserve.

COMMENTS FROM GERMANY

43. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

**10. Mozambique : Sustainable Financing of the Protected Area System in Mozambique
[UNDP]**

COMMENTS FROM FRANCE

44. The project aims at strengthening the system of Protected Areas in Mozambique with a view to ensure its financial sustainability.

45. France, who has developed a broad cooperation with Mozambique in the field of protected areas, welcomes this proposal and commands the good coordination that prevailed during the PIF preparation.

46. The PIF provides a clear vision of the articulation between this proposal and existing bilateral (AFD, FFEM, KFW, WWF...) and multilateral (World Bank/GEF) initiatives. Good complementarities can be highlighted, in particular when dealing with the conservation trust fund, whose preparation is currently financed by WWF, KFW and AFD.

Opinion: Favorable

COMMENTS FROM GERMANY

47. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

11. Namibia : Protected Landscape Conservation Areas Initiative (NAM PLACE) [UNDP]

COMMENTS FROM FRANCE

48. The project proposes to develop a conservation network at the landscape level in Namibia, linking together protected areas, community conservancies and private lands.

49. France clearly supports this approach which will ensure the long term sustainability and the best impact of on-going ambitious conservation schemes developed by Namibia in its National Parks, conservancies, ...

50. The project should make sure nevertheless that it is well balanced in its approach. Community conservancies are, for the majority of them, young structures and strong support will be needed to ensure they are fully involved and empowered in the co-management structures developed at the landscape level while it doesn't affect their respective development.

Opinion: favorable

COMMENTS FROM GERMANY

51. The following recommendations should be taken into account during further elaboration of the project.

- Almost $\frac{3}{4}$ of the total project costs are co-financing of which \$5 mio. are from bilateral donors, which are not named, in the final proposal it would be important to know these donors.
- There are overlaps with other projects, which should be carefully analysed for better using synergies and complementarities, particularly the UNDP-GEF *Country Pilot Partnership Programme for Integrated Sustainable Land Management (CPP/ISLM)*. The proposal considers treating different land-use systems separately (agriculture and forestry through CPP/ISLM versus tourism and wildlife through NAM-PLACE). This appears to us not very meaningful considering the targeted landscape conservation approach which will integrate the different land use systems.
- The GTZ project on „Biodiversity and Land management“ together with the Namibian Environment Ministry evaluates development and marketing options for different products. Overlaps occur with on-going activities promoting the sustainable use of native wildlife for the meat market.

- Further connections are with the German bilateral project „Support to land reform” which advises in the area of land-use planning and resettlement policy. The PIF does not indicate whether the proposed landscape conservation areas are compatible with the land-use, development, and resettlement plans of other sector ministries.

52. The project will make an important contribution if:

- Communal and commercial land /resource user on the landscape level are integrated into a comprehensive co-management concept which propagates natural/ “nature near” management systems
- The further development of the proposal is based on an inclusive consultation process with all actors and stakeholders, including other sectors
- The compatibility with land reform objectives as well as land-use and development plans is assured
- Synergies and complementarities with above mentioned initiatives are clearly established, especially initiatives of German development cooperation with long-term experiences in the fields of legal frameworks, communal development, community based resource management, biotrade and income diversification in protected areas, land-use planning, etc.
- The interests of local populations with generally weaker negotiation capacities are taken into account adequately.

12. Niger : SPWA-BD Integrating the Sustainable Management of Faunal Corridors into Niger's Protected Area System [UNDP]

COMMENTS FROM FRANCE

53. The project concept is raising several concerns and the project overall sustainability remain unclear.

Opinion: mitigated, with the following questions and remarks to be taken into account during project preparation:

- The project is promoting a huge extension of the Niger PA system, in fact more than doubling the % of protected area (from 6,6 % to 15,3 %, and even 23,2 % if adding the faunal corridor), while at the same time the PIF identify that the pre-existing PA system is not adequately managed, staffed and sustainably financed. As a matter of fact, this project is thus promoting the increase of paper parks in the country.
- The project is making the assumption, that the main cause of the degradation of Niger biodiversity is mainly the insufficient extent of the Niger territory under protection (currently 6, 6 %) which is justifying the project to support Protected Area extension. This assumption is not convincing at this stage:
- As far as we know, Niger is no more hosting large groups of migrating mammals and antelopes in particular. Most of them are in so endangered status that only small groups are remaining and, as said in the PIF, these small groups are havening in remote mountainous area or away from transhumance routes.
- If biodiversity is decreasing even inside PA, and if sometimes some antelopes are found outside PA, it is mainly because they are not in security within the existing protected areas which are, as the PIF is also clearly diagnosing it, not sufficiently managed, staffed, and financed:
 - “The number of field-level rangers for patrolling is clearly insufficient and those who are active are poorly trained and poorly equipped”;
 - “...insufficient and ineffective surveillance and enforcement has not deterred poaching within PAs”;
 - “Enforcement of hunting legislation is weak and insufficient to ensure that [...] hunting is not taking place in locations where it is banned (PAs in particular).”

54. As a conclusion, the extension of surface of Niger territory under protection status is of course important on the long term, but it is not the immediate priority: instead of what the project is proposing, all efforts should be focused on increasing the effective management, enforcement, staffing and financing of the existing PAs, in order to provide safe haven to the remaining wildlife which is sometime in near extinction state.

55. In the Tadres, recent monitoring campaigns are showing that there are almost no more antelopes. The situation in Air Ténéré is so complex for political reasons that enforcement of protection and safety of wildlife remains complicated. Again the development of a 10 million ha faunal corridor seem a biological unrealistic and a misuse of GEF resources in the current situation.

56. On another hand, while the PIF is recognizing that “Currently, adjacent communities see little benefit in the existence of reserves” the project is providing no convincing solutions to provide alternative livelihood to the local transhumant communities. Providing “strategic water points” and developing a “landscape-wide management plan [...] in a participatory fashion” is not a convincing solution to provide alternative livelihood to the traditional users of the 20,9 millions ha of area that the project is willing to convert to protection status, either as protected area or faunal corridor. The project should allocate much more attention and support to the development of alternative livelihood instead of counting on cofinancing and assistance from food security measures and humanitarian assistance.

57. To end, the overall sustainability of the project is absolutely not convincing. Investments in new PAs are supposed to be secured by “government commitment to taking over operational and staff costs [...] to ensure the sustainability of this intervention”. According to the current lack of resources from the government to secure the operation, staffing and maintenance of existing PA, this assumption is not realistic.

58. On the other hand, the perspective of ecotourism development to contribute to PAs management will not be sufficient in the long term to secure the financial sustainability of the overall Niger PAs system.

59. The PIF states that in 2007, only 8000 tourists enter to visit the country. Even if this amount was doubled, all of them going to the northern PAs (instead of moving to the W, as the majority is already doing currently) and the willingness to pay was reaching 50 USD per tourist (which is absolutely not realistic), the income generated would only reach 800.000 USD/year, which will provide less than 0,05 USD/year/ha of new protected areas, which is absolutely insufficient to sustainable manage and maintain the new PAs. Revenues from sustainable hunting remain to be proven; idem cofinancing from the private sector.

COMMENTS FROM GERMANY

60. The project operates in an area of the country, which is politically instable and prone to conflicts. Final project design must correspond to this situation.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

13. Russian Federation : Improving the Coverage and Management Efficiency of Protected Areas in the Steppe Biome of Russia [UNDP]

COMMENTS FROM GERMANY

61. This project can be supported without a need for further comments.

COMMENTS FROM SWITZERLAND

General Comments

62. The protection of Russia's diversified but highly endangered and fragmented grassland communities (steppe and forest steppe) is of extreme urgency constituting one of the highest national and international conservation priorities. The proposed project approach with focus on (a) expanding the existing protected area system; (b) ecological connectivity; and (c) rehabilitating degraded steppe lands, is logical from a conservation perspective and meets GEF's Strategic and Operational Program requirements. If successful the project will result in global benefits.

Questions, Concerns, Challenges and Suggestions Related to Project Preparation

- The timeline for the project has not been identified. Considering time requirements for the proposed establishment of new protected areas, their being decreed, and the anticipated elaboration and implementation of corresponding management plans, a minimum project duration eight years is suggested.
- Expected outputs iii) (Component 1.) and iii) (Component 3.) indicate stakeholder "consultation" instead of stakeholder "participation" needed to achieve stakeholder ownership in newly created PAs. "Cooperative Governance" (see point i), Component 3) may only be achieved through a truly participatory planning and decision-making process.
- Project Component 2, reference fire management: please explain fire-ecology of targeted steppe areas; are fires a natural occurrence? Are targeted steppe areas fire climax systems? Define "wild fire" and causes. Increase in numbers as a result of changing climate and weather pattern?
- Output iv) of Component 3: how will database be established and how can it be socialized in Russia?

- With reference to co-financing: the \$ 10,5 million Government contribution in cash is pledged or committed? What is the cash going to be used for?
- Page 5, first paragraph indicates “...lack of involvement of local stakeholders in PA activities and project”. Participation cannot be achieved through “consultative process” as suggested by project. Empowerment of local stakeholders will be key to success.
- Risks and Mitigation: The need for participatory multi-disciplinary inter-institutional (= integrated) spatial land-use planning is essential for project success and should be central to the project. Government commitment on all levels and willingness to empower rural stakeholders and communities will be the key to success. How will this be addressed by the project?

Conclusions and Recommendations

63. The project should be endorsed if identified barriers are addressed satisfactorily.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

14. Sri Lanka : Strengthening Capacity to Control the Introduction and Spread of Alien Invasive Species [UNDP]

COMMENTS FROM GERMANY

64. Most invasive alien species are not introduced intentionally, and even if so, they are mostly not introduced in an organised way by well-defined stakeholders. The introduction and spread of invasive alien species remains therefore hardly tangible. Proposed interventions such as capacity building, strengthening the policy framework, etc., may therefore have only little effect. The risks of the project to achieve tangible results are therefore considered high.

15. Sudan : Launching Protected Area Network Management and Building Capacity in Post-conflict Southern Sudan [UNDP]

COMMENTS FROM GERMANY

65. Since the decision has been taken to confine the length of PIFs to four pages, they again started to become longer gradually. The present PIF comprises 11 pages and has a clear potential to be presented in a briefer way.

66. As the GEF uses three higher level intervention levels (project objective, project outcomes and project outputs) it is not clear how the “project components” (used in the logframe on p. 1-2) fit into this intervention logic and what they are good for.

67. Chapter G (cost-effectiveness): It is not necessary to describe here why an investment into a protected area system is cost-effective; it should be better outlined why the way doing it in the proposed way is cost-effective (would there be e.g. scenarios with a higher cost-effectiveness such as working directly with the government instead of working through an international NGO?).

68. The risks the project will face are high and surely not always manageable.

CLIMATE CHANGE

**16. China : Promoting Energy Efficient Room Air Conditioners (PEERAC) Project
[UNDP]**

COMMENTS FROM AUSTRALIA

- This project would support work towards China's energy efficiency goals and may serve as a useful example of technology transfer.
- The project would be important if it could influence the relevant authorities to facilitate and ensure the approval and enforcement of recommended policies in this sector.
- Australia notes that the project will need to look carefully at how to work with authorities to achieve the project's outcomes.

COMMENTS FROM FRANCE

69. The project proposes to promote Energy Efficient Room Air Conditioners in China.

70. Electricity consumption by aircon is a rising issue in China due to the stress it puts on already thin-stretched electricity production, the poor efficiency of the equipments involved and the subsequent carbon emissions it causes. In this line, France supports the project objective and activities proposed.

71. Looking at the detail of the proposal, we consider nevertheless that some important partners are nevertheless missing. To have a full impact, the project must involve or reach out towards the ministry of construction, the commission for construction at the provincial level, the university and professionals (developers, architects...) involved in the design of buildings.

72. The project should also make the link with the necessary energy efficiency measures in terms of building design. Otherwise, the poor energy efficiency of building will off-sett any progress of efficiency with the aircon equipments.

Opinion: Favorable with a request to address the above questions.

COMMENTS FROM GERMANY

73. Reference is made to the STAP comments regarding the need to elaborate cost implications/barriers of introducing the technology and also the relevant practical technical implications as mentioned in the STAP Review.

COMMENTS FROM SWITZERLAND

Overall Commentaries

74. The project addresses energy efficiency of room air conditioners and with this covers a highly relevant area of energy consumption in China. The project is well defined and can build on existing experience from the domestic refrigerator market. Some elements and barriers however are not adequately addressed in the PIF and need to be elaborated for the full project brief as outlined below.

Questions, Concerns and Challenges for the further Project Preparation

- Under component 1 efficiency improvement of RAC compressors is included. The PIF does not address how access to efficient compressor designs can be ensured (e.g. through technology cooperation with other compressor manufacturers). Highly efficient compressor designs may involve proprietary know-how and may only be accessible through industry licensing schemes, etc. No reference is made in the PIF to supporting/establishing a sustainable domestic development and research infrastructure. How can continuous compressor efficiency improvement be sustained after the project end?
- The PIF also does not explain how the barrier of incremental cost for the manufacturer can be overcome effectively. Production of energy efficient compressors will require upgrading of production equipment and hence involves significant investment costs. To a lesser extent this also applies to Component 2 (energy efficient AC units) as some technical measures to improve efficiency also lead to higher production costs, e.g. for larger size condensing units. In order to address investment barriers to manufacturers CDM opportunities should be explored, e.g. for application of CDM Methodology AM0071. For work on CDM related issues also additional financing from China CDM Fund may be explored.
- Under component 3 (Promotion of energy efficient room air conditioners) the issue of incremental cost for the buyers of efficient RAC units is not yet adequately addressed (willingness to pay). How can this barrier be effectively worked on?

75. How does the project contribute to linking Montreal Protocol and Kyoto protocol activities? The project should effectively be linked with the HCFC Management Phase-out plan to promote low GWP refrigerants as replacement to HCFC.

Conclusions and Recommendations

76. On basis of above considerations we recommend going ahead with further developing the project and taking into account the various points raised in this project review and in the STAP review. The issues raised should be adequately addressed in the final document which will be submitted for CEO endorsement.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

17. India : IND Financing Energy Efficiency at Small and Medium Enterprises - under the Programmatic Framework for Energy Efficiency [World Bank]

COMMENTS FROM FRANCE

77. The project objective is to facilitate energy efficiency investment in the SME sector.

78. Around 10 sub sectors (“clusters”) are targeted amongst intensive energy consumers such as the forging, the foundries, and the lime and bricks kilns sectors. More than 500 units are considered for which the project will provide funding, guarantee, technical assistance.

79. The project will be implemented with the Indian Bureau of EE (the “BEE”) and various local banks such as the Small Industries Bank of India (SDIBI) in line with a previous experience of the Bank program (Developing financial intermediation mechanisms in China, India and Brazil).

80. It is expected a financial investment flow of 50 USD millions and a contribution of the GoI of 7, 5 USD millions (6 millions in cash). The CO2 reduced is evaluated at 6 millions tones.

81. The sectoral approach is interesting to identify quickly the potential of reduction and establish the necessary benchmarks. The linkage with the financing institutions from the beginning is also very necessary to facilitate the financing and the support to the SME to invest. However, the role of the GoI is not clear in the document (what will be the GoI contribution?) nor the evaluation of GEF contribution.

82. A justification on the basis of the previous completed project could have been useful and informative especially in the case of this new project of which the cost is in upper trench.

Opinion: Favorable owing to some additional clarification and justification.

COMMENTS FROM GERMANY

83. This project can be supported without a need for further comments.

COMMENTS FROM SWITZERLAND

Overall Comments

84. The proposed project addresses a very important issue. The diagnosis is correct as it is true that small scales industries have not been so far in general successful in reducing on a large scale their specific energy consumption.

85. Experience over the last 10 years in India in this sector shows that projects have been successful only in a few niches like foundries (energy efficient cupola now becoming exponentially reproduced), glass industries (bangle industry in Firozabad with over 60% of energy efficient furnaces equipped with heat recovery) and brick industries. The cluster approach has proven successful, even though the development across national industrial body like the IIF (Indian Institute for Foundrymen) may allow national level dissemination of energy efficient systems.

86. Over the last 10 years, due to the globalization and the exposure of many of the SMEs sectors, one could see a shift from a very short-sighted reasoning in SMEs to a more professional approach toward modernization and preparation for international competition. Environmental pressure has also played a major role. Therefore this project comes at the right time, when SMEs are ready for investments for the future.

Questions, Concerns and Challenges for the further Project Preparation

87. If one wants to attain significant energy savings in the SMEs, one has to go much beyond what regular energy auditors who do not consider the system as a whole usually perform, but the different components and their individual performances (e.g. boilers, pumps, blowers, etc.).

88. The main challenges, as we understand them, are of different natures and are mentioned at different levels in the proposed project document. We stress here which are the main challenges beyond purely financial aspects:

- (a) For many SMEs still using centuries' old technologies, and not large enough to adopt OECD countries' technologies, there is usually no off-the-shelf solution. Identification and development of technology packages, which do not address the energy efficiency alone, must also integrate production quality. It is in nature more complex than usual to gain energy efficiency by simply substituting blower, pumps, etc ... by more efficient equipment. The design of the system itself must be questioned, including the technology of the process.
- (b) Confidence in developed solutions SME: industrialists need to see the demonstration of the solutions that are proposed in similar units with numbers obtained in real operation. Here the main issue is to get early adopting industrialists ready and willing to share their experience with competitors.

- (c) Generally energy auditors do not have a sufficient grasp of the global issues in the sector. There is a need to train the auditors to be able to analyze and propose solutions which go beyond the simple change of blowers.
- (d) Supply chain for technology support, quality control and delivery: once a technology package has been developed and is well defined by tight specifications for a cluster of similar SMEs, the manufacturers must have assistance/support for quality control during fabrication and installation. The units must also get support while testing the new equipment.
- (e) Time scale: bankers are usually not used to realizing and understanding the duration of the development process (no off-the-shelf solution) and the need for a long maturation until actual projects can be replicated on a large scale in clusters. The proposed time scale may be too short for the cycle of such a project.

Conclusions and Recommendations

89. This project addresses very important issues for the SMEs in India. It should be supported.

90. The questions, concerns, and challenges shown above should be taken into consideration while designing the project in detail.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

18. Indonesia : CF: Promoting Energy Efficiency in the Industries through System Optimization and Energy Management Standards [UNIDO]

COMMENTS FROM FRANCE

91. The project aims at disseminating good practices amongst the key industries (500 targeted industries in the mining, paper, chemical and petrochemical, and textile and other energy consuming sectors) emitting GES through the development of energy management systems and energy efficiency standards.

92. The project includes: (i) promotion of ISO energy standards; (ii) capacity building on optimal energy processes; (iii) guidance for investments and soft financing; and (iv) demonstration projects and dissemination of the lessons learnt.

93. The project complements several bilateral projects on the same subject (Netherlands, Japan, Denmark) and one regional project with UNDP (Application of EE Products standard and Labeling in Asian countries).

94. UNIDO is building this project on the results of a precedent and similar project realized in China (2004). At the end of the project, the saved energy is evaluated at 102 GWh representing around 75 000 tones of CO₂.

95. The project is interesting in the sense that it promotes the use of energy standards, the energy management amongst the big industrial consumers. However, the quantity of CO₂ reduced and energy savings (75 000 tones and 102 GWh) seem rather small. Another question is the prior endorsement by the companies themselves of such a program. The lessons learnt on China would be very useful and informative.

Owing to this, our opinion is favorable.

COMMENTS FROM GERMANY

96. It remains unclear why an industry should adopt ISO energy management standards and whether there is a sectoral focus for the activities outlined. Have cost barriers been quantified? What are the intended project interventions to overcome barriers?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

19. Philippines : CF: Industrial Energy Efficiency [UNIDO]

COMMENTS FROM GERMANY

97. It remains unclear why an industry should adopt ISO energy management standards and whether there is a sectoral focus for the activities outlined. Have cost barriers been quantified? What are the intended project interventions to overcome barriers?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

20. Philippines : Chiller Energy Efficiency Project [World Bank]

COMMENTS FROM GERMANY

98. Potential barriers for the introduction of new chillers should be described more precisely. In addition, the PIF should provide more detailed information on the intended incentive structure and how it could help to overcome these barriers.

21. Thailand : Industrial Energy Efficiency [UNIDO]

COMMENTS FROM FRANCE

99. The project proposes to promote energy efficiency in industries in Thailand.

100. Among the activities considered, the financial mechanisms that will support the industrial partners are crucial to ensure the sustainability of the approach and its wide impact. Accordingly, the project should pay special attention to the development of such mechanisms.

101. When it comes to the choice biomass boilers for demonstration project, the rationale leading to that choice should be elaborated (resources in terms of biomass in Thailand, current use, potential impact on biodiversity...).

Opinion: favorable with a request to address the above questions.

COMMENTS FROM GERMANY

102. It remains unclear why an industry should adopt ISO energy management standards and whether there is a sectoral focus for the activities outlined. Have cost barriers been quantified? What are the intended project interventions to overcome barriers?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

**22. Venezuela : IMPROVE: Increase Product Efficiency in Venezuela (RESUBMISSION)
[UNDP]**

COMMENTS FROM GERMANY

103. Reference is made to the STAP comment that it remains unclear what the incentive for manufacturers are to commit to energy efficient production, and secondly whether there is a strategy for replacement of inefficient appliances - if there is one, what does it say?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

23. Vietnam : Phasing out Incandescent Lamps through Lighting Market Transformation in Vietnam [UNEP]

COMMENTS FROM FRANCE

104. Vietnam has a recent but fast growing CFL industry (5 millions units in 2003 vs. 70 millions in 2007). Around 40% are low quality hampering the image and the development of the energy saving lamps (ESL).

105. The projects aims at: (i) improving the quality and the size of the production of ESL at the levels of lamp industries; (ii) improving the quality controls by the GoV (testing, comparison to regional and international standards); (iii) developing awareness regarding ESL through promotion and campaign; and (iv) developing national policy and strategy to phase out 75 % of IL (incandescent lamp).

106. This would lead to the division by 2 or 3 the electricity consumption due to the lighting (1.2 million of CO2 per year).

107. The project complements an on-going GEF / UNDP project (VEELP – Vietnam EE in Public lighting).

108. The GoV is expected to contribute up to 2, 5 USD millions while the Private sector contribution is estimated to 3 millions.

109. The project shows a challenging target with the removal of 75% of IL from the Vietnamese market in 4 years. The way how to reach the target is not consolidated at this stage and would need the full support of the GoV.

Opinion favorable subject to clear answers before commitment:

How will the support be provided by the GoV?

What is the degree of implication of the industries?

COMMENTS FROM GERMANY

110. This project can be supported without a need for further comments.

INTERNATIONAL WATERS

24. Regional (Comoros, Maldives, Mauritius, Sao Tome and Principe, Seychelles, Cape Verde) : Implementing Integrated Water Resource and Wastewater Management in Atlantic and Indian Ocean SIDS [UNEP/UNDP]

COMMENTS FROM FRANCE

111. It is interesting to link in this project a broad panel of country that is facing different experiences and practices.

112. The project will have to pay particular attention to the networking aiming to ensure the dialogue between countries.

Favorable opinion subject the above consideration

COMMENTS FROM GERMANY

113. Please specify the co-financing sources for the project. The co-financing amounts are indicated, but the sources are not mentioned.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

25. Regional (Jordan, Palestinian Authority) : Red Sea-Dead Sea Water Conveyance Study Program [World Bank]

COMMENTS FROM FRANCE

114. France is strongly involved in the Red Sea- Dead Sea Project with a total amount of 3 millions euros (AFD 2 millions euros – FFEM 1 million euros). This additional GEF contribution to the project allowed launching the studies and focusing them to environmental issues.

Favorable opinion

COMMENTS FROM GERMANY

115. Germany is not able to provide a comment due to the minimal content given in the PIF. A description of the project framework is not provided and thus details how the project is going to be developed further are missing. The co-financing sources are still to be determined. Please specify these issues when developing the full project document.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

26. Regional (Afghanistan, Iran) : Restoration, Protection and Sustainable Use of the Sistan Basin [UNDP]

COMMENTS FROM GERMANY

116. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

27. Regional (Antigua and Barbuda, Barbados, Costa Rica, Guatemala, Guyana, Honduras, Panama, St. Lucia, Suriname) : Testing a Prototype Caribbean Regional Fund for Wastewater Management (CReW) [IADB/UNEP]

COMMENTS FROM FRANCE

117. The project's objective is sound and timely.

Opinion: Favorable, with the following questions and remarks to be taken into account during project preparation:

118. The project preparation should clarify how GEF grants will be used and if they are not used to improve IDB's discount on soft loans.

119. The project lack some proper activity and component to monitor the impacts of improved investments in waste water management on water quality and national biodiversity in particular (coral reef for example).

120. If this activity is not appropriately designed, it will be impossible to demonstrate the impact of the CReW and the verification of its justification.

121. The outcome indicators proposed are reduced BOD levels and coliform concentration (plus several indicators in annex 5), while the justification of the project is on the overall conservation of the natural capital of the Caribbean.

122. For example, the PIF state p5:” *Discharge of untreated wastewater has other impacts as well. The CARSEA study found that sewage was one of the main factors that had caused some 80 percent of living coral in the Caribbean to be lost over the past twenty years. Damage by untreated wastewater to the marine environment including living coral can bring about severe economic consequences for people in the Caribbean. The CARSEA study found that “the Caribbean is the region in the world most dependent on tourism for jobs and income,” while “fishing is also a significant source of both income and subsistence.”*

123. The monitoring system framework doesn't provide appropriate tools for monitoring project impact on marine biodiversity and socio-economic status (jobs, etc.). Project preparation needs to address this issue.

COMMENTS FROM GERMANY

124. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

28. Mexico : Regional Framework for Sustainable Use of the Rio Bravo [UNEP]

COMMENTS FROM GERMANY

125. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

LAND DEGRADATION

29. Montenegro : Montenegro Institutional Development and Agriculture Strengthening (MIDAS) [World Bank]

COMMENTS FROM GERMANY

126. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

MULTI-FOCAL AREAS

30. Regional (Cameroon, Congo DR, Equatorial Guinea, Gabon, Congo, Central African Republic) : CBSP Enhancing Institutional Capacities on REDD issues for Sustainable Forest Management in the Congo Basin [World Bank]

COMMENTS FROM FRANCE

127. The objectives of the project are relevant. They will allow strengthening the institutional capacities of Congo Basin countries to assess how sustainable forest management could be taken into account in carbon market.

128. The project is fully articulated with two FFEM contributions.

129. The project Cascade aims at enhancing national expertise to generate African carbon credits in LULUCF and bio-energy activities. This project is implemented by UNEP with a technical assistance of CIRAD and ONF. The project Forafama aims at assesses the potential of sustainable forest management in forest concessions in term of reducing deforestation and degradation.

130. **It will be useful to define a practical framework to strengthen the links between these projects.**

Favorable opinion

COMMENTS FROM GERMANY

131. Although the proposal aims at strengthening institutional capacity in the Congo Basin, the list of eligible countries excludes 4 of 10 COMIFAC member countries, and only 4 countries of the 10 are included in the FCPF. Additional regional activities addressing REDD/post-Kyoto aspects in all COMIFAC countries should be considered to increase the regional relevance of the project and to foster political acceptance within COMIFAC.

132. The Project start date of July 2010 appears rather late to allow the project to provide useful assistance to the region in the climate debate, as stated among the outcomes of component 1. Details provided on stakeholder participation in component 1 to not explain how the project is planning to ensure that the interests of indigenous peoples are considered in the REDD mechanisms. Wide-spread corruption in the region poses a serious challenge to any

benefit sharing mechanism. These issues are, however, not yet addressed in the proposal's risk analysis.

133. The proposal remains vague on a number of project management issues: the selection of appropriate national coordination units is of critical importance for the project success and should be clarified in all countries before project implementation begins. Further clarification on the role of the COMIFAC secretariat and other regional initiatives, such as the COMIFAC regional working group on climate change/REDD and the ADIE (regional agency for environmental information) in project coordination is needed, as well as on the role of the Advisory Group and the Congo Basin Forest Partnership (CBFP) in donor/project harmonisation needs. Agreed regional mandates and roles should be duly considered in this clarification.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

31. Regional (Chile, Peru) : Towards Ecosystem Management of the Humboldt Current Large Marine Ecosystem [UNDP]

COMMENTS FROM FRANCE

134. The project proposes to develop a management of the Humboldt Current at ecosystem level. This positioning is relevant to ensure that all issues involved in terms of the conservation of the natural resources of this area are addressed. Nevertheless, the difficulty is to ensure that the project covers all bases reasonably and sensibly with its limited resources.

135. In this regard, the project focus on marine protected areas appears unbalanced and not addressing fully the fishing pressure which is one of the main threat.

136. More activities on fishing management should be developed.

137. In parallel, the project should elaborate on the concrete measures it proposes to ensure the financial sustainability of the 5 new Marine protected areas it proposes to create.

Opinion: Favorable with a request to address the above questions.

COMMENTS FROM GERMANY

138. Germany agrees to the project proposal provided that the further guidance outlined in the STAP review will be taken into account during the next project planning phase.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

32. Argentina : Establishment of Incentives for the Conservation of Ecosystem Services of Global Significance [UNDP/UNEP]

COMMENTS FROM FRANCE

139. The project proposes to develop payment for ecosystem services (PES) in Argentina.

140. There are few large scale experiences of operational PES scheme worldwide. The proposal can be considered accordingly as pioneer work with the related risks. But, the development of such schemes is crucial to ensure the up-scaling of conservation approaches and their sustainability.

141. France brings its full support to this initiative.

Opinion: Favorable

COMMENTS FROM GERMANY

142. Although the PIF complies with all the necessary criteria, especially when taking into account the valuable STAP comments, from our point of view levels of risk might have to be re-evaluated and also the corresponding risk management. Due to the difficult political and economic situation at present, increased communication and awareness creation will be necessary in order to demonstrate the advantages of PES mechanisms and the adequacy of compensation payments from taxes to the public and political decision-makers. The “willing – to – pay” concept needs active lobbying through effective communication strategies.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

33. Brazil : SFM Strengthening National Policy and Knowledge Frameworks in Support of Sustainable Management of Brazil's Forest Resources [FAO]

COMMENTS FROM FRANCE

143. The project proposes to strengthen the information and knowledge management relating to forest management with a view to help decision makers.

144. The general objectives are similar to those of the UNEP Brazilian information system project presented in the work program.

145. The same questions apply: involvement of international partners? Involvement of the State level? Time needed for the measures to have some real impact?

Opinion: Favorable with a request to address the above questions.

COMMENTS FROM GERMANY

146. Changes outlined below should be made during further planning steps and during project implementation.

- GTZ is already supporting some activities mentioned in this proposal, particularly the development of a Monitoring and Evaluation System (#3, no. 4 Forest Information System). Activities need to be aligned as the project is further developed.
- The proposal with the description of the components is very generic in many parts, does not specify the roles of the project partners and why they were selected. It doesn't mention the key players to be considered for an institutional partnership on land-use decisions, many of whom have very adverse agendas to SFM. Though the Brazilian Forest Service has the mandate to oversee SFM, they don't have the mandate to oversee development and land-use decisions e.g. of the Amazon Region. The proposal should be more specific in how this integrates into national policy making and what the role and the limit of the BFS is.
- The proposal elaborates on what needs to be (or will be) achieved but is scant on how these processes will be designed and fed into national policy.
- A lot of information has already been created and is available somewhere, thus a distinction should be made between information that has to be gathered in field

surveys and information which can be readily (or not) retrieved from various (public) sources.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

34. Cambodia : SFM Strengthening Sustainable Forest Management and the Development of Bio-energy Markets to Promote Environmental Sustainability and to Reduce Green House Gas Emissions in Cambodia [UNDP]

COMMENTS FROM FRANCE

147. The project proposes to promote forest management at the landscape level with a view to address the wood-fuel production issue in Cambodia.

148. The principles involved (inter-sectoral coordination, landscape approach) are well adapted to the Cambodian situation in terms of forest managements. Such an approach is also currently supported by the French cooperation (AFD/FGEF) in the Cardamoms landscape in partnership with Conservation International, the Forest Administration, FFI and the Ministry of Environment. Their implementation nevertheless remains a challenge since the pressure on natural resources is ever increasing in Cambodia and specifically in the area foreseen by the project due to an steady increase of the population, hydro-electric and mining schemes in forest protected area. Based on the last point, the approach developed needs to involve not only the ministries in charge of agriculture and environment but also the ministry in charge of mine and energy.

149. The project should also have a strong demonstration base and in this regards we would urge for the project to have stronger links and build strength with the on-going activities in the Cardamoms landscape (Aural and Samkos Sanctuaries, Central Cardamoms Protected Forest).

150. Finally, the project should take into consideration the ongoing development of REDD proposals in Cambodia since they might bring an interesting extra financial support to the project.

Opinion: Favorable with a request to address the above questions.

COMMENTS FROM GERMANY

151. This project can be supported without a need for further comments.

COMMENTS FROM SWITZERLAND

Overall Comments

152. The project aims at sustainable forestry management (SFM) by means of political work, demonstration, and certification of wood and wood products. At the same time, it aims at an increase of the economic benefit of forestry management by implementation of bio-energy chains with increased efficiencies. Due to the high ecological value of natural forests, SFM is regarded as an important issue and the combination of SFM with economic benefits and implementation of improved technologies is regarded as a valuable approach to contribute to a better protection of the biodiversity of existing forests.

Questions, Concerns and Challenges for further Project Preparation

153. Both measures for SFM and technologies for ecological bio-energy are only described in a very generic way in the project proposal.

154. It remains unclear which standard of technologies for cooking with wood and for charcoal production is used nowadays and which technologies are planned to be implemented and how they shall be introduced in the market. Hence a clarification is needed before project start, since efficient and low polluting cooking with wood is a huge challenge. Different concepts for small cooking devices for wood have been developed and might be considered. However, some of these technologies need adaptations in the wood preparation and in the operation and hence it needs to be evaluated which type of cooking device is most promising for use in Cambodia. In any case, a transfer of knowledge on the production and utilization of efficient cooking stoves will be needed and prior to this, technology adaptations might be necessary in case the existing technologies do not fit the specific needs. For this purpose, tests and developments prior to the implementation might be necessary, which is not considered in the project proposal.

155. Furthermore the reason and needs for charcoal production remain unclear. Traditional charcoal production is related to high pollution and low efficiency. However, if charcoal is used for cooking and/or heating applications, the production of charcoal is questionable even if it is replaced by improved technologies, since direct utilization of wood may achieve higher efficiency and hence it might be favourable to fully replace charcoal production by other applications of wood. On the other hand, an implementation of efficient and hence industrial size technologies for charcoal production might lead to a high local demand for wood, which might lead to an excessive local wood utilization and result in contradiction with the target of SFM.

Conclusions and Recommendations

156. The chance of a successful implementation of SFM may certainly be increased if SFM is linked to the introduction of improved chains for regional utilization of wood and wood products and thus also result in local economic benefit. This approach of the project sounds very

promising and hence the project is basically supported. However, it remains unclear what type of technologies and how they shall be implemented. It is assumed that relevant initial work will be needed to prepare the technology implementation either by development or by adaptation of efficient and environmentally-friendly wood cooking devices. Further, regional resources in craft and industry might be necessary for the production of respective cooking devices. In addition, the implementation of more efficient technologies for the conversion of natural wood into charcoal is a potential risk of an increased local wood utilization, which needs to be considered. Besides, the purpose of charcoal needs to be reflected generally, since direct utilization of wood for other purposes might be more efficient.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

35. China : PRC-GEF Partnership: Silk Road Ecosystem Restoration Project [ADB]

COMMENTS FROM AUSTRALIA

- Australia supports this as a project particularly useful in relation to environmental challenges in China and reflecting previous GEF work on Land Degradation in Dry-land Ecosystems.
- The project has useful synergies with a proposed Australian-supported program in Qinghai and Australia may be interested in collaborating with the GEF in aspects of this project. For example specific pilot activities could provide useful opportunities for shared learning, as could aspects of policy development, drawing on Australia's experience working in this sector in China.
- Australia supports the focus of the project on grasslands, given their importance for carbon stocks.
- Australia recommends taking a realistic approach to what can be undertaken through the project, and welcomes the realistic assessment of risks involved (e.g., capacities of local government, incentives).

COMMENTS FROM GERMANY

157. This project can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

36. Ecuador : SFM Sustainable Management of Biodiversity and Water Resources in the Ibarra-San Lorenzo Corridor (Ecuador) [IFAD]

COMMENTS FROM GERMANY

158. Changes outlined below should be made during further planning steps and during project implementation.

- The project can have positive impact, if it is implemented in complementarity to other already ongoing or planned projects. So as to avoid duplication of work, further planning and project implementation should be closely coordinated with the ongoing and new bilateral German projects: KfW - MAE “Sistema Nacional de Áreas Protegidas SNAP“, which will provide support to protected areas and biocorridors in Northern Ecuador and the GTZ – MAE programme for natural resources management, which will also provide support to indigenous communities, e.g. to Chachi, and, from 2009 onwards will contribute to the protected area network.
- Furthermore close coordination should take place with the MAE programme “Socio Bosque” aiming at compensation for avoided deforestation, which has been initiated in 2008 and will be financed by the GoE with 16 Mio USD.
- Adaptation to climate change should be taken up under point “F.6. Risks associated with climate change” (page 8).

COMMENTS FROM SWITZERLAND

General Comments

159. The targeted corridor area of Ecuador’s northern region encompasses some of the country’s most threatened ecosystems and most marginalized ethnic communities, especially in the coastal part of the corridor; a very appropriate choice for both reasons. The project meets GEF’s Strategic and Operational Program requirements.

Questions, Concerns, Challenges and Suggestions Related to Project Preparation

- The 6-year timeline for this 11 million USD highly ambitious project is too short. Suggested timeline minimum 8 years, preferably 10 years.

- Please explain “soft loan” of 8.6 million USD. How much GEF Grant and how much IFAD? Co-financing of \$ 2 million appears to be very low compared to total project cost of 11 million USD.
- Mainstreaming biodiversity conservation at the project level: will this component build on experience by GTZ trying to achieve the same within coastal communities (Synergies)?
- Component 3: “...Payment / Reward for Environmental Services mechanism...”. How will financial sustainability be achieved of payments to be made? Also see E.2. ii): would this not be voluntary participation by stakeholders and/or goodwill?

Conclusions and Recommendations

160. The project should be endorsed if identified barriers are addressed satisfactorily.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

37. India : SLEM - Sustainable Land, Water and Biodiversity Conservation and Management for Improved Livelihoods in Uttarakhand Watershed Sector [World Bank]

COMMENTS FROM GERMANY

161. This project can be supported without a need for further comments.

COMMENTS FROM SWITZERLAND

Overall Comments

162. The objective of the project is to restore and sustain ecosystem functions and biodiversity while enhancing income and livelihood functions. The project operates at a watershed level and is organized according to seven components: (i) participatory watershed planning; (ii) sustainable land management; (iii) fostering markets for NTFPs; (iv) biodiversity conservation; (v) climate change adaptation; (vi) description and dissemination of best/worst practices; and (vii) project management.

163. The project fits the GEF Focal Areas Land Degradation, Biodiversity and Climate Change by addressing the Strategic Programs LD-FA SP1, BD-FA SP4 and SP5 and Climate Change SPA.

164. We welcome the application of the ecosystem approach. The ambitious project identifies many activities to be implemented, with each of them being justified *per se* (with exception of the Chir pine needle briquettes, see STAP review). The main challenge for the further development of the project will be to refine the planning of activities to secure their mutual supportiveness. Special attention should also be given to address all local participants and existing initiatives.

Questions, Concerns and Challenges for the further Project Preparation

165. Our concerns for the further project preparation are identified as follows:

First: The project foresees the elaboration of a study on the impact of climate change on mountain ecosystems and, at the end of the project, the implementation of a strategy for the management of the impacts of climate change. However, the success of sustainable watershed and land management as well as afforestation and reforestation, alternative agricultural technologies and other planned activities depends on taking into account climate change at a very early stage of project planning and implementation. We

therefore recommend giving the climate change component a high priority, to focus the study on project areas and to redefine the whole project and implement the activities as a part of an adaptation strategy.

Second: We consider the introduction of improved crop varieties of high value in parallel with the conservation of traditional crops and general crop diversification and intensification to be a high challenge. How will the farmers be persuaded to cultivate traditional crops when high value (= high yield) varieties become available? Special attention should also be given to avoid drawbacks on biodiversity from agricultural intensification.

Conclusions and Recommendations

166. On the basis of the above considerations we recommend going ahead with further developing the project, taking into account the various points raised in this project review and in the STAP review. The issues raised should be adequately addressed in the final document which will be submitted for CEO endorsement.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

PROGRAMMATIC APPROACH: BIODIVERSITY

1. Strategic Program for West Africa (Biodiversity) (SPWA-BD) (NEW)

COMMENTS FROM FRANCE

167. France welcomes this timely but challenging program for West Africa.

168. It is important for the program nevertheless to address the following issues:

- secure the consistency of the program with regional biodiversity conservation priorities. It is not clear with the current program design, if the program will be able to tackle trans-border or trans-national biodiversity issues; and
- secure coordination of the GEF program with other biodiversity conservation initiatives, particularly from other multi and bilateral donors in the region.

169. France wishes to indicate that it supports, via the French Ministry of Foreign and European Affairs(MAEE) and the French GEF (FFEM), an IUCN West African initiative to foster the assessment of Protected area management effectiveness.

170. One of the components of this regional initiative has succeeded in establishing a regional master in the 2IE university in Ouagadougou (Burkina Faso) which aims at training West African student in Protected Area Management.

171. There are obvious potential synergies between this project and the GEF strategic program so that France recommends contacts are made quickly between MAE/FFEM and WB/GEF teams to look into it.

172. In the broader sense, it would be good that the project preparation develop a coordination matrix gathering an overview of the main other interventions in biodiversity conservation in West Africa supported by multi and bilateral donors in West Africa, in order to characterize area of possible coordination/collaborations.

COMMENTS FROM GERMANY

173. The proposed program is supported.

174. The Program is an “umbrella” covering 17 countries with very different ecological, social and political frameworks. Therefore it can only give general orientations and strategic outlines.

175. These strategic outlines are clear and balanced. It’s important that poverty alleviation, biodiversity in landscapes and sustainable finance mechanisms are considered top priority in order to maintain biodiversity. There is a strong tendency to concentrate on corridors and other linkage between PA’s to improve the overall results. Another positive point is to improve the political support for biodiversity on a regional level, but not leaving it to papers and experiences in the political arenas, but to implementation on the ground in order to verify or to correct the corresponding policies. The feedback loops between policies and ground level must be one of the key elements for the knowledge management.

176. Within the knowledge management it is clear that some areas/countries are better off than others. The transfer of good practises is not “old stuff” but will be considered innovative in the other area. Established partnerships between regions with similar contexts are in our experience very helpful, if the exchange is not limited to capacity building for agents/government officials but incorporates also members of the communities, local NGOs and regional advisory staff.

177. There is a lot of hope put on income generation through tourism. This potential is often overestimated. We have to keep in mind that a number of countries are in a post-conflict situation (Liberia, Sierra Leone) and others in civil unrest (Cote Ivoire, Niger, Mali, Chad).

178. We are looking forward to receive the different PIF’s in the pipeline, with more detailed information and perhaps already “good practise” examples, to be transferred after the necessary adaption.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

2. Biosafety Program (endorsed by Council in April 2008)

PROGRAMMATIC APPROACH: CLIMATE CHANGE

3. Strategic Program for West Africa (Climate Change) (SPWA-CC) (NEW)

COMMENTS FROM FRANCE

GEF Lead agency : UNIDO

179. The program aims at promoting a regional impetus in the fields of RE and EE throughout opened, pooling, results based orientated and coordinated approaches to overcome the present situation of fragmented initiatives that are promoted by the various donors and institutions.

180. The overall objective is to meet the gap between demand and supply of energy, and develop long term strategy and policy in RE and EE.

181. The program will be under the supervision of a steering committee and implemented by a coordination mechanism which will receive support from UNIDO.

182. The program has been endorsed by 18 countries in West Africa + Burundi. 27 projects in 18 countries have been identified at the concept level but the modalities of their implementation are not defined at this stage except the GEF agency responsibility identification for each project.

183. The project has the ambition to stimulate and to coordinate a regional impetus in the fields of RE and EE declined in various sectors (energy, biomass, buildings, transport, etc).

184. It represents a tentative of downscaling the GEF work program at the level of a region which shares common issues and faces similar difficulties.

185. The GEF would like to facilitate the dialogue, the synergy between the various actors and the different programs.

186. The coordination would be given to UNIDO. This initiative fits in CEDEAO and UEMOA programs but no details are given regarding its endorsement by those organizations.

187. The fees charged by UNIDO are not specified.

188. The role of bilateral agencies is not defined.

Favorable opinion subject to clarification. In any case, the program needs to be structured and defined before implementation. The monitoring should be put in place in an easily accessible and readable manner by stakeholders and observers...

COMMENTS FROM GERMANY

189. While the intention to invest much more strongly in West Africa, a region with a large number of LDCs is highly commendable, it is important to stress that in this region energy consumption per capita is low and that for many people access to reliable and sustainable energy sources is a central concern before considering emission reductions. Nevertheless renewable energy sources can and should play an important role in supplying West African countries with energy. As the individual projects are not yet public, it is not possible to say at this point how good the fit is between energy issues in West Africa and the measures that will be proposed eventually.

COMMENTS FROM JAPAN

190. Japan proposes this GEF program to exchange information with Japan's initiative "Japan-UNDP Joint Framework for Building Partnership to Address Climate Change". The Framework is a part of the Cool Earth Partnership Framework specifically established to assist adaptation in Africa, and is a 92 million dollar earmarked assistance pledged at the Tokyo International Conference for African Development in May this year. The Japan-UNDP Joint Framework intends to supplement the existing and on-going GEF activities in Africa, and we would like to propose future GEF projects such as this West Africa program to be implemented in a concerted manner with the Japan-UNDP initiative.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

4. Framework for Promoting Low Greenhouse Gas Emission in Buildings (NEW)

COMMENTS FROM FRANCE

GEF Lead agency: UNDP

191. UNDP has been involved in 20 projects dealing with EE in buildings including Russia, China, India, Pakistan, etc.

192. The overall objective of this programmatic program is (i) to confirm the leadership of UNDP in this field; and (ii) to give global approval for a new set of projects (21) to be implemented during GEF-4 (6 – 19 USDm) and the future GEF-5 (15 – 53 USDm).

193. The new countries concerned are South Africa, Algeria, Syria, Pakistan, Thailand, Rwanda, Burundi and others.

194. The partners, the co-financing and the modalities of implementation are unknown.

195. The document gives a clear summary of the common barriers and solutions met in the field of EE. It is generally a long process to put in place the adequate framework and the modalities of implementation are fundamental to go beyond the concept and the institutional framework and to go into action.

196. The presentation of the experience of UNDP in this respect would be of foremost interest to understand the feasibility of the new top down approach proposed by UNDP.

Favorable opinion subject addressing above questions.

COMMENTS FROM GERMANY

197. Very important area both in terms of emissions and in terms of mitigation potential. STAP comments are echoed here: According to the program most risks appear at the project level. However, some program level risks, which are common to most Technological interventions need to be addressed. These risks could include: high first cost, poor performance of the Technical intervention, lack of access to technology and climate change.

COMMENTS FROM SWITZERLAND

Overall Comments

198. The programme targets at improvements in building design, performance of equipment and human behavior with a view to reducing GHG emissions from both new buildings and existing stock on a global scale. Apart from being a major source of greenhouse gas emissions, buildings offer both an immense potential to reduce greenhouse gas emission and measures which are considered to be among the most cost-effective options for emission reductions.

199. The programme framework aims at providing the necessary tools and distributing widely the most efficient and effective policies, legal and financial mechanisms, technologies and construction practices. The programme will consist of national projects that are expected to harmonize tools and approaches to facilitate a broader market expansion.

200. The programme design is basically well defined but seems too ambitious and lacks a clear focus and priority: the programme virtually covers all types of buildings in all regions but also a very broad range of thematic issues. There is concern that the wide scope leads to dilution of all efforts and resources and will take a long time to produce tangible results. It is therefore suggested that the further programme refinement targets a better focus, taking in particular the aspects outlined below into account.

Questions, Concerns and Challenges for the further Programme Refinement

- Focus on instruments and approaches to overcome barriers rather than technologies: The programme rightly addresses the point that despite the economic and technical potential to significantly reduce GHG emissions from buildings very little is happening. It is appreciated that high importance is hence given to the barriers that hinder the application and dissemination of energy efficient building concepts and constructions. Consequently, technologies should not be given highest priority. However, the programme includes a large number of technical options, independent of the true needs that will most likely vary significantly from region to region. It is suggested to give a stronger focus and select a package of technologies that also takes into account the specific climate conditions, the level of economic development and infrastructure availability of/in the various regions.
- Defined target regions: Similarly, it might be wise to group regions and countries for which a certain technology package is considered to fit.
- Existing experience: It is questioned whether the programme design provides sufficient scope to effectively benefit from earlier or ongoing experience in the building sector, much of which was implemented with GEF's support. The final programme should include a strategy how to tap this experience, mainly from such in developing countries.
- Risks: The current programme claims that most risks appear at the project level. We consider risks at programme level (such as high initial costs, lack of access to

finance and of adequate financing instruments, and infrastructure/supply chain deficits (mainly in developing countries)) to be of equal importance. These risks also need to be addressed.

Conclusions and Recommendations

201. Based on the above recommendations we recommend integrating the above comments in the further formulation and refinement process of the programme taking into account explicitly the various points raised in the STAP review.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

5. Reducing Industry's Carbon Footprint in Southeast Asia through Compliance with a Management System for Energy (NEW)

COMMENTS FROM AUSTRALIA

- Australia notes that the design's explanation of the value of taking a programmatic approach in this sector is not strong.
- The only benefits noted are the involvement of regional organizations and coordination of the program with scheduled meetings of regional bodies. The design does not address the potential benefits of a PA, as outlined on pp3-4 of GEF/C.33/6 "From Projects to Programs". The rationale for the program would be strengthened if clear strategic benefits (including in relation to management and outcomes) were detailed. Otherwise, this program risks being a collection of projects without strategic level coherence.

COMMENTS FROM FRANCE

GEF Lead agency: UNIDO

202. A new ISO energy management standard is to be published by 2010 (ISO 50 000) with a view to increase energy use efficiency in industry.

203. The program will consist of training of core experts, support of EE in industry (systems optimization) and adoption of energy management standards. The training will use the experience of the Georgia Institute of Technology (USA). UNIDO will work with regional organizations as ASEAN. (Committee on standards and quality).

204. The 2 projects commented above are part of this global program. The comments remain valid that is to say:

- (a) Degree of implication of the industries in the program and the government (co-financing, steering committee)?
- (b) Experience and lessons learnt from previous project (ex: China)?
- (c) Sustainability of the program (who is in charge of the management?).

Subject to clear answer, favorable opinion.

COMMENTS FROM GERMANY

205. Overall good and relevant concept. There are a number of fundamental questions critical to the success of the program:

- What are the costs to shift to energy efficient systems – are they prohibitive for entrepreneurs?
- It remains unclear what the incentives for an industry are to adopt ISO energy management standards – to what extent is a governmental/ policy framework necessary to move implementation along?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

6. Programmatic Framework for Energy Efficiency in India (endorsed by Council in April 2008)

PROGRAMMATIC APPROACH: MULTI-FOCAL AREAS

7. Congo Basin Strategic Program (CBSP) (NEW)

COMMENTS FROM FRANCE

206. The three main components of this Strategic Program are relevant to reduce the threats that affect Congo Basin countries.

207. Most of the identified project under this program is closely linked with different FFEM and AFD projects working in Congo Basin countries. For this reason, it is needed a close cooperation between GEF project and others stakeholders through institutional frameworks involved in environmental protection of Congo Basin.

208. What will be the next steps for approval the Program and the projects?

Favorable opinion

COMMENTS FROM GERMANY

209. The strategic program for Sustainable Forest Management in the Congo Basin is considered a timely and welcome addition to the regional initiatives supporting sustainable management and conservation of the Congo Basin forest ecosystems. We believe that the Program was within in its very ambitious timeframe well developed and that participation of stakeholders was high.

210. The program's regional focus on 6 out of the 10 COMIFAC member countries effectively excludes the countries of Burundi, Chad, Rwanda and Sao Tomé/Principe from the program. This may seem justified when looking purely at the extent of the Congo basin forests but poses a considerable challenge, when it comes to regional integration, capacity development and policy harmonization. Expanding the regional focus of the program to be fully in line with the COMIFAC would increase the regional relevance of the project and would foster political acceptance of the program within the COMIFAC region.

211. The program rightly emphasizes the regional coordination and policy harmonization role of the COMIFAC and the need for better coordination between the different funding initiatives in the Congo Basin, most prominently the CBSP and the Congo Basin Forest Fund (CBFF). The CBFF and the CBSP have overlapping objectives, are both to be implemented within the

framework of the COMIFAC convergence plan and have similarly structured steering committees. The program outline foresees funding to support institutional strengthening of the COMIFAC Secretariat to boost COMIFAC's capacity as the main coordinator for sustainable forest management in the region but does not address the question how program harmonization could be achieved realistically. The program management structure should be flexible enough to allow for an integrated approach to multi-program coordination through the COMIFAC Secretariat and should include provisions to ensure that transaction costs and the risk of a regional or thematic program bias are minimized.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

8. Sustainable Forest Management (endorsed by Council in November 2007)

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

**9. PRC-GEF Partnership on Land Degradation in Dryland Ecosystems Program
(endorsed by Council in April 2008)**

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.34/6)**

**10. Sustainable Land and Ecosystem Management (SLEM) Partnership Program
(endorsed by Council in November 2007)**