



**Compilation of Comments Submitted by Council Members
on the GEF Trust Fund December 2024 Work Program**

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEFTF December 2024 Work Program.

TABLE OF CONTENTS

OTHER PROGRAMS	1
1. Global (Cameroon, Eswatini, Gabon, Madagascar, Nigeria, Uganda) Global Elimination Program for PCB (GEP-PCB) (GEF ID 11749). Agency: World Bank, UNDP, UNEP, AfDB; GEF Project Financing: \$ 43,825,000; Co-financing: \$ 163,000,000.....	1
2. Global (Belize, Dominican Republic, Egypt, Honduras, Indonesia, Jamaica, Maldives, Mexico, Morocco, Seychelles, Tanzania, Trinidad and Tobago, Türkiye, Vanuatu). Integrated Collaborative Approaches for Sustainable Tourism Program (iCOAST) (GEF ID 11729).Agency: UNDP, UNEP, UNIDO, FAO, IADB, EBRD, WWF-US; GEF Project Financing: \$ 81,834,862; Co-financing: \$ 737,768,029	2
3. Global (Pakistan). Global Clean Hydrogen Programme – Addendum (GEF ID 11723). Agency: UNIDO; GEF Project financing: \$1,326,147; Co-financing: \$26,826,484.	3
4. Global (Benin, Costa Rica, Egypt, Gambia, Ghana, Mexico, Nepal, Nigeria). Financing Agrochemical Reduction and Management Plus Program - FARM+ (GEF ID 11682). Agency: UNDP, UNEP, UNIDO, FAO, AfDB; GEF Project Financing: \$ 59,074,144 (LDCF – 5,390,302; GEF TF – \$ 53,683,842); Co-financing: \$ 556,741,692.....	4
STAND-ALONE FULL-SIZED PROJECTS	6
Biodiversity	6
5. Global. GEF-8 Inclusive Conservation Initiative (GEF ID 11761). Agency: WWF; GEF Project Financing: \$22,535,780; Co-financing: \$83,799,902.....	6
6. China. Conserving Biodiversity and Natural Resources through Spatial Planning and Integrated Landscape Management (GEF ID 11693). Agency: UNDP. GEF Project Financing: \$5,509,453; Co-financing: \$59,400,000.	8
7. Brazil. Integrated Landscape Management for Biodiversity Conservation and mitigating Climate Change in the Caatinga - Conecta Caatinga (GEF ID 11565). Agency: Funbio; GEF Project Financing: \$5,504,588; Co-financing: \$17,000,000.....	10
8. Indonesia. Strengthening the integrated landscape management and governance for the conservation and sustainable use of forested areas important for biodiversity and ecosystem services (AIBDES) in Indonesia (GEF ID 11530). Indonesia. FAO. GEF Project Financing: \$7,105,936; Co-financing: \$56,000,000.....	11

Chemicals and Waste	12
9. Ukraine. Hazardous Waste Management and Policy Development Project for Ukraine (HWM-PDU) (GEF ID 11712); Agency: World Bank; GEF Project Financing: \$7,214,612; Co-financing: \$38,775,000.....	12
10. Brazil. Environmentally sound management and disposal of excess mercury and mercury waste from removing mercury electrolytic cells in Brazil’s chlor-alkali sector (Chlor-alkali Brazil) (GEF ID 11697); Agency: UNEP; GEF Project Financing: \$12,000,000; Co-financing: \$344,250,000.....	14
11. Global. Chemicals and Wastes Financing Partnership Facility (CWFPF) (GEF ID 11681); Agency: ADB, UNIDO; GEF Project Financing: \$29,083,000; Co-financing: \$300,800,000.....	15
12. China. Life Cycle Management Project in Plastic Industry in China (GEF ID 11543); Agency: UNDP; GEF Project Financing: \$20,265,000; Co-financing: \$182,385,000.	17
Climate Change.....	19
13. India. Accelerating sustainable energy transition for decarbonization of micro, small and medium manufacturing enterprises in India (GEF ID 11758). Agency: UNIDO; GEF Project financing: \$8,982,420; Co-financing: \$71,190,000.	19
14. Regional (Dominica, Grenada, Saint Kitts and Nevis, Saint Lucia, Suriname). Strengthening national capacities for implementing the Enhanced Transparency Framework in Caribbean countries (GEF ID 11675). Agency UNEP; GEF Project financing: \$6,750,000; Co-financing: \$375,000.....	20
International Waters.....	20
15. Regional (Kenya, Tanzania). Unlocking the Groundwater Potential of the Kilimanjaro Water Tower (GEF ID 11547). Agency: FAO; GEF Project Financing: \$7,105,936; Co-financing: \$56,500,000.	20
16. Regional (Colombia, Dominican Republic, Grenada, Jamaica, Panama, Saint Lucia, and Trinidad and Tobago). Promoting the Integrated Management of Sargassum: Building Resilient Tourism and Fisheries Sectors through the Conservation of Marine Ecosystems in Caribbean countries (SargMarine) (GEF ID 11526). Agency: CAF; GEF Project Financing: \$10,000,000; Co-financing: \$76,300,000.....	21
17. Regional (Chile, Ecuador, Peru). The Digital Seafood Revolution: Electronic catch documentation and traceability systems (eCDT) for sustainable and legal fisheries in Chile, Peru, and Ecuador (GEF ID 11674). Agency: UNEP; GEF Project Financing: \$8,000,000; Co-financing: \$80,079,269.....	23

MULTI-FOCAL AREA PROJECTS.....	26
18. Liberia. Promoting Sustainable Land Management for the achievement of Land Degradation Neutrality for Improved Equity, Sustainability, and Resilience in Rice Landscapes of Liberia (GEF ID 11720). Agency: FAO; GEF Project Financing: \$5,114,019; Co-financing; \$37,582,973).	26
19. Fiji. Revitalizing Ecosystems for Sustainable Agriculture and Resilience in Fiji (RESAR) (GEF ID 11718). Agency: IFAD; GEF Project Financing: \$8,226,629; Co-financing: \$13,200,000.....	27
20. Colombia. Participatory restoration to improve the provision of ecosystem services and connectivity at the landscape scale in Colombia (GEF ID 11679). Agency: UNEP; Project Financing: \$18,103,569; Co-financing: \$82,668,594.....	28
21. Montenegro. Integrated management of multiple use landscapes/seascapes to promote biodiversity conservation, ecosystem restoration, improve land and marine productivity and economic benefits to local communities (GEF ID 11533). Agency: UNDP; GEF Project Financing \$5,594,293; Co-financing \$48,400,000.	30
22. Tanzania. Integrated Landscape Management for Sustainable Ecosystem Services and Community Livelihoods in Wami-Ruvu River Basin (GEF ID 11407). Agency: UNEP; GEF Project Financing: \$5,329,452; Co-financing: \$27,893,250.	32
NON-GRANT INSTRUMENT.....	33
23. Regional (Africa). Green Mobility Financing Facility for Africa (GEF ID 11671). Agency: African Development Bank; GEF Project Financing: \$13,461,468; Co-financing: 547,450,000.	33
24. Rwanda. Rwanda Wildlife Conservation Bond (GEF ID 11514). Agency: The World Bank; GEF project financing: \$9,000,000; Co-financing: \$154,100,000.	34
25. Regional (Eastern Europe and Central Asia). Sustainable and Inclusive Green Acceleration Programme (GEF ID 11513). Agency: European Bank for Reconstruction and Development; GEF Project financing: \$13,761,469; Co-financing: \$253,808,341.	35
MULTI-TRUST FUND PROJECTS	36
26. Yemen. Building Climate Resilience for Vulnerable Groups in Rural and Urban Areas of Yemen (GEF ID 11717). Agency: UNDP; Total Project Financing: \$19,883,486 (LDCF: \$18,098,624 and GEFTF: \$1,784,862); Co-financing: \$61,100,000.	36
27. Samoa: Strengthening Climate Adaptation, Biodiversity Conservation, and Combating Land Degradation through Ecosystem-based Adaptation (GEF ID 11700); Agency: UNDP; GEF Project Financing: \$5,329,452 (SCCF-A: \$2,689,726; GEF TF: \$2,639,726); Co-financing: \$37,024,000.	38

28. Togo: Strengthening the resilience of natural and agro-ecosystems and communities to climate change in Central Togo (GEF ID 11548). Agency: UNDP; GEF Project financing: \$ 6,649,315 (LDCF: \$3,989,589; GEF TF: \$GET is \$2,659,726); Co-financing: \$68,523,913.....	38
SMALL GRANTS PROGRAMME.....	40
29. Global. Eighth Operational Phase of the GEF Small Grants Programme (GEF ID 11757); SGP CSO Challenge Program. Agency: IUCN; GEF project financing: \$9,075,229; Co-financing: \$ 4,500,000.....	40
30. Global. Eighth Operational Phase of the GEF Small Grants Programme (GEF ID 11726). Agency: UNDP; GEF project financing: \$65,420,307; Co-financing: \$65,420,307.....	41
31. Global. Eighth Operational Phase of the GEF Small Grants Programme (GEF ID 11698). Agency: FAO; GEF project financing \$17,500,554; Co-financing: \$17,500,554.00.....	42

**DECEMBER 2024 GEFTF WORK PROGRAM (REFERENCE: GEF/C.68/04/Rev.02):
COMMENTS FROM COUNCIL MEMBERS**

OTHER PROGRAMS

1. **Global (Cameroon, Eswatini, Gabon, Madagascar, Nigeria, Uganda) Global Elimination Program for PCB (GEP-PCB) (GEF ID 11749). Agency: World Bank, UNDP, UNEP, AfDB; GEF Project Financing: \$ 43,825,000; Co-financing: \$ 163,000,000.**

✓ **Germany Comments**

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

- In the methodology section (page 12), the proposer suggests exploring whether local cement kilns can be equipped and approved for PCB destruction. The safe thermal treatment of PCB requires specific conditions and processes that commercial cement kilns may not be able to maintain. Germany recommends that, in case of thermal treatment (especially in facilities other than hazardous waste incinerators) in the respective partner countries, international standards and protocols (e.g. Council Directive 96/59/EC of the European Union) are adhered to and emissions are strictly monitored. Furthermore, it is important to ensure that the necessary competencies for in-situ sampling and analysis to monitor emissions are available in the target countries.
- Outcome 2.1 proposes a cost-benefit analysis and replacement plan (2.1.1) for the replacement of equipment. Germany recommends considering co-benefits, such as the mitigation of greenhouse gases, and integrating these into the cost-benefit analysis.

✓ **Japan Comments**

- The "Promotion, Demonstration, and Commercialization Project for Highly Efficient Amorphous Power Distribution Transformers in Kenya" proposed by the Joint Venture of Toyota Tsusho Corporation and Proterial, Ltd. was adopted in the FY2023, responding to the Small and Medium-Sized Enterprises and SDGs Business Support Program public Announcement.
- Contract negotiations are currently underway.
- This is not a project that aims at discontinuing the use of transformers and other electrical equipment containing PCBs.
- Reference:
 - https://www.jica.go.jp/about/announce/sdg_bncs_bvs/2023/index.html

✓ **Switzerland Comments**

- Could the knowledge component of the project potentially be expanded to cover awareness raising among informal e-waste recyclers and small enterprises about PCBs?

2. **Global (Belize, Dominican Republic, Egypt, Honduras, Indonesia, Jamaica, Maldives, Mexico, Morocco, Seychelles, Tanzania, Trinidad and Tobago, Türkiye, Vanuatu). Integrated Collaborative Approaches for Sustainable Tourism Program (iCOAST) (GEF ID 11729). Agency: UNDP, UNEP, UNIDO, FAO, IADB, EBRD, WWF-US; GEF Project Financing: \$ 81,834,862; Co-financing: \$ 737,768,029**

✓ **France Comments**

- The objective is to reduce the environmental impacts of tourism (pollution, GHG emissions, loss of biodiversity) while stimulating the local economy and creating inclusive jobs.
- The project seems to be a good opportunity to support more sustainable tourism in the DR (the tourism sector being the country's major economic driver with well-identified areas (Punta Cana, Samana) but it will be necessary to adapt certain approaches to meet the different needs and environments of the Dominican tourism sector. This also constitutes an opportunity for the future tourist hub (Pedernales) to have sustainable tourism practices in place now for its future massive development.
- A few points to pay attention to: The smallest hotel and tourism enterprises are not taken into account, in spite of their participation in high numbers in the tourism sector (e.g. large resorts that could "subcontract" activities to smaller companies). Institutional strengthening also requires strong coordination between public and private actors and a willingness to take ownership of the subject. It will be important to not to fall into green marketing and to measure the true impact of the actions that will be taken.
- The GEF Sec will have to ensure that:
 - Smaller hotel organizations are also taken into account in the project;
 - Coordination will be ensured between public and private actors within the framework of the project;
 - Environmental monitoring indicators are well defined to verify the environmental impact of the activities and that this is not "greenwashing".

✓ **Germany Comments**

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

- Germany suggests broadening the scope of the proposal from just high-end tourism to also include SMEs tourism providers and suppliers, for example in a destination management approach. High-end tourism products are most likely already quite advanced in environmental regulation and savings implementation in the countries mentioned, whereas higher need can be seen for SMEs. Using a destination management approach would widen options to improve management systems, including low or no cost behavioural change and maintenance. Some of the envisioned partners in the proposal have sound experience in working on destination level.

- Germany points out that tourism is a cross-sectoral economic sector that utilizes other key sectors to engage in climate mitigation measures. Therefore, Germany suggests evaluating the climate mitigation potential of planned activities.
- Germany would like to have more clarity and explanation on component 1: various intervention levels are mentioned (national level legislation / governance, industry level regulations, company level regulations). However, a focus on a specific level would be favorable, especially under view of the project duration and needed time to implement the regulations.
- Germany supports the uptake of green finance in component 2, and has the following suggestions for improvement of component 2:
 - As access to green finance solutions is often more challenging for small and medium enterprises (SMEs) than for bigger hotels, we suggest to change the focus here to SMEs instead.
 - Linking technological solutions with financing would be valuable. Please explain, which strategies you are envisioning for this.
- Germany suggests improving the Theory of Change through reconsidering the relations made in the following statement: “the creation of new jobs and livelihoods in sustainable tourism and tourism related supply chains would lead to inclusive and resilient jobs, provide equal opportunities for women, youth, IPLC and disadvantages groups and respect workers’ rights and conditions”.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project and would like to see more engagement with eastern Caribbean countries.

3. Global (Pakistan). Global Clean Hydrogen Programme – Addendum (GEF ID 11723). Agency: UNIDO; GEF Project financing: \$1,326,147; Co-financing: \$26,826,484.

✓ **United Kingdom Comments**

- This looks like an interesting programme, particularly as it is an established programme which Pakistan is joining so can learn from others. We did not spot any political risks, only transport and storage risks which will be common to all countries, and presumably UNIDO has plans for mitigating these.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project and appreciates the emphasis on gender equality and empowerment of women in carrying out the work under this program. We encourage UNIDO to diversify partners and projects linked to this project to broaden knowledge dissemination and capacity building efforts beyond aligning with only the “Green hydrogen energy integrated demonstration application project in China” GEF project.

4. **Global (Benin, Costa Rica, Egypt, Gambia, Ghana, Mexico, Nepal, Nigeria). Financing Agrochemical Reduction and Management Plus Program - FARM+ (GEF ID 11682). Agency: UNDP, UNEP, UNIDO, FAO, AfDB; GEF Project Financing: \$ 59,074,144 (LDCF – 5,390,302; GEF TF – \$ 53,683,842); Co-financing: \$ 556,741,692.**

✓ **Germany Comments**

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

- Germany notes that core interventions of FARM to promote bio-pesticides and less hazardous alternatives and to phase out HHP and POPs, particularly interventions regarding illegal trade and enhancement of national policies and monitoring capacities, are not detailed out in the program description of FARM+. However, as there is no overlap in countries of child projects between FARM and FARM+, essential interventions of FARM (compare Output 1.1-1.3 of the FARM project) should also become an integral part of FARM+ to ensure that the use of HHP and POP will be effectively reduced.
- While it is positive that the project proposal follows a systemic approach, Germany asks to provide more details on the core interventions. The successful implementation will depend on strong cooperations with key stakeholders and synergies with on-going projects working on the respective sub-topics. Further, Germany recommends to conduct an in-depth analysis of existing initiatives and potential cooperations when further designing the child projects. Examples to be considered are e.g.
 - FAO's work on Monitoring and Analysing Food and Agricultural Policies (FAO-MAFAP) should be considered. Furthermore, the World Bank is currently conducting agricultural expenditure reviews in Ghana and Nepal and plans to do so in Egypt. The FARM+ project should engage with the WB as early as possible to create synergies.
 - The [Global Database on Sustainable Land Management](#) hosted by CIFOR-ICRAF contains a wide array of sustainable land management practices.
 - The [Growing Benin's organic cotton sector](#) project under the Sustainable Agriculture Supply Chain Initiative ended in October 2024 and should be considered as starting point for further expanding organic cotton production in Benin.
 - The [Soil Values Program](#) in West Africa and the [West Africa Fertilizer and Soil Health Hub](#) based at IITA, Nigeria.
- While access to value chains that encourage SCRA is very imported and reflected in one of the six pathways, extensive engagement with private sector platforms will be necessary. Germany recommends to consider the Aid for Trade Foundation and its Standard [Cotton made in Africa](#) for the cotton value chain.
- Germany also recommends seeking exchange with the following GIZ projects fostering sustainable, climate resilient agriculture and agri-finance:
 - [Costa Rica: From Farm to Fork Mainstreaming Biodiversity in Agricultural Food Value Chains \(Banana\)](#), ACCION Clima III - Support to reaching Costa Ricas Climate targets and dissemination into the region, Scaling-up Ecosystem-based Adaptation (EbA) Measures

in rural Latin America, Business Cooperation and Biodiversity in Central America and Dominican Republic

- Mexico: Sustainable Agriculture - Transformation of agricultural and alimentation systems for biodiversity and climate protection (Mexico)
- Nigeria: Transformative Agricultural Systems for Rural Economic Development in Nigeria
- Nigeria and Benin: Promotion of agricultural finance for agri-based enterprises in rural areas
- Ghana: Resilience Against Climate Change

✓ **Norway & Denmark Comments**

- This program is to support governments and agricultural stakeholders in transitioning from unsustainable agricultural practices to sustainable and climate resilient agricultural practices in a manner that protects, regenerates and improves productive landscapes and soil health and reduces soil and water pollution as measures for adaptation through nature-based solutions and access to adaptation support.
- Supporting a transition to climate smart agricultural practices emphasizing reduced use of harmful pesticides and promoting nature-based solutions is in line with Norwegian priorities both for agriculture and food security as well as for environment and human health.

Issues to consider:

- The principles for Integrated Pest management (IPM) should be adhered to.
- Illegal/counterfeit agricultural chemicals are an issue in many countries in the global south. Countries may have the legal framework in place; however, the enforcement is lacking. Emphasis should therefore be put on supporting the countries in enforcement.
- The STAP screening states (2.1) 'It is not clear how the project will strengthen national enforcement capacity, e.g., tackle the illegal production and trading of pesticides'. The partners should cooperate with Interpol's Environmental Crime Unit. Interpol is working on these issues and the national governments in the project countries would be members of Interpol.
- Early warning is important to stop agricultural pests at an early stage. A variety of interactive tools have been developed to assist extension workers and farmers to discover pests in the field at an early stage. Norway is for example supporting development of one such tool in Malawi – Malawi Digital Plant Health Service (MaDiPHS). Through this, farmers scanning a plant or the leaf of a plant with a smartphone can get instant feedback on the pest(s) encountered and advice on treatment.
- In the 8 countries, UNDP is lead in 3 (Mexico, Costa Rica and Nepal), UNEP in 1 (Benin), UNIDO in 2 (Egypt and Ghana), AfDB in 1 (Nigeria) and FAO in 1 (Gambia). In most countries (all?), there will be a coordination group on agriculture and food security. FAO will always be a member of this type of group; however, it is important that the FARM+ lead institution

also take part if such a group exists to secure optimal coordination with the other donors in the sector.

- The project description mentions ‘..introducing low-risk pesticides..’ and ‘...targeting cost-effective, green alternatives to synthetic chemicals...’; more information on this would be useful.
- Nepal is also one of the project countries, and Norway have a wide portfolio there also supporting agriculture and climate change interventions including the support to ICIMOD (International Centre for Integrated Mountain Development). The project should seek to collaborate with ICIMOD because ICIMOD is working on many the same issues as described in the proposal, and the institution have top international and national expertise in this field.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project and appreciates the comprehensive approach towards addressing sustainable agriculture, integration of nature-based solutions, and focus on gender equality and social inclusion.
- We would encourage the project to make the theory of change more explicitly detailed to show clear causal links between activities, outcomes, and impacts, which will help in understanding how the proposed interventions will lead to the desired transformational change.
- While the monitoring and evaluation framework is robust, it could benefit from more specific indicators related to the socio-economic impacts on local communities in Nepal, particularly in terms of income generation and food security.
- Stakeholder engagement is mentioned, but it would be helpful to see the proposal provide more details on how the implementors will ensure continuous and meaningful engagement with local communities in Nepal, especially Indigenous Peoples, through the project lifecycle.
- We would like to see clearer transition strategies that are practical and achievable for farmers who rely on agrochemicals.

STAND-ALONE FULL-SIZED PROJECTS

BIODIVERSITY

5. **Global. GEF-8 Inclusive Conservation Initiative (GEF ID 11761). Agency: WWF; GEF Project Financing: \$22,535,780; Co-financing: \$83,799,902.**

✓ **Germany Comments**

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

- Germany emphasizes the importance of gender as a crosscutting issue and acknowledges the plan to systematically include gender issues in all components.
- Germany welcomes the envisioned gap analysis under component 3 and asks to clarify how a duplication with existing structures like the CBD Voluntary Fund and LCIPP will be avoided. In addition, Germany suggest to also apply the gap analysis to national and regional decision-making levels.
- Germany suggests including “community-based monitoring” in component 5 as it strengthens existing IP&LC forms of monitoring, as also envisioned in the Global Biodiversity Framework of the CBD.
- Germany recommends circulating the call for expression of interest to various IP&LC networks, including among others the GATC UNPFII, IIFB and ICCA Consortium.
- Germany recommends to include the following two aspects under barriers or assumptions and in other appropriate chapters: a) tenure insecurity and b) lack of political will of governments to recognize and respect the rights of IP&LC.
- Germany welcomes that Output 1.2.1 emphasizes the importance of self-designation between the three “pathways” of Protected Areas (PAs), OECMs and Indigenous and Traditional Territories (ITTs). To guarantee self-determination, Germany urges that Free, Prior and Informed Consent is implemented as early as possible and as a continuous process when planning new PAs and OECM designations in areas on, overlapping with, or neighboring IP&LC territories.
- The indicators include area targets for new PAs and OECMs. However, the indicators lack a measurement related to ITTs, such as improved tenure security, or demarcation of IP&LC territories, or e.g. registration in the ICCA registry. Germany recommends including an indicator on ITTs.
- As mentioned in the proposal, in some cases there are overlaps between PAs and ITTs. Germany asks to clarify how those and often associated historical injustices will be addressed.
- Germany emphasizes the long-term importance of component 2 on institutional strengthening and recommends a close interlinkage between component 1 and 2, combining project implementation and institutional strengthening.

✓ **Norway & Denmark Comments**

- Norway strongly supports the project’s emphasis on direct funding to indigenous people’s and local communities’ organizations in order to increase their resources, rights, and abilities to deliver global environmental benefits. The project proposal is clear and many elements are well developed, but the following questions and weaknesses should be addressed:
 1. The [STAP](#) points out several elements that need strengthening. We would like to highlight the need to develop mitigating measures against **elite capture**, addressing the

lack of recognition of indigenous tenure and resource rights as a barrier (not merely a risk), and the need for a diversity of **stakeholder consultation approaches**.

2. The knowledge base for the barriers is thorough, but the **knowledge base for the proposed interventions** and how these will contribute to systems change is less developed. Learning from GEF7 ICI is referred to with regards to project management elements (information to applicants, assessment formats, capacity building), but less with regards to learning from successful models for strengthening IP/LC governance of GEBs and there are few references to learning from other relevant initiatives.
 3. **Follow up of partners:** Organizational strengthening of partners (both of impact partners and accelerator partners), which is a key activity and outcome of the project, requires a good understanding of context and close follow up. It is unclear from the PIF whether WWF US will work through WWF offices in implementation countries – and whether this will guide the selection of partners. In order to maximize impact, it may be beneficial to focus on geographical areas where WWF already has a good understanding of the actors and barriers.
- ✓ **Switzerland Comments**
- According to the main co-funder, the Tenure Facility, in their experience only a small fraction of funding went to IPs and LCs-led organizations. What will you make different with this project that you reach the aim of 80% of funding going to IP and LC organizations, as outlined on page 18 of the PIF?
 - What lessons from the ongoing ICI-7 project are informing your approach, and what key changes are you implementing in response?
 - What is the role of the Project Management Unit (UPU) in supporting the development and implementation of the subproject plans? The PIF is not very specific in that regard (page 25).
 - Is there a clear distinction between Impact Partners and Accelerator Partners, or can an organization serve both simultaneously? Could you elaborate on how these roles are distinct in practice?
 - How do you measure success with Component 2: Self-Strengthening of IPs and LCs organizations to govern territories, lands, waters and resources?

6. China. Conserving Biodiversity and Natural Resources through Spatial Planning and Integrated Landscape Management (GEF ID 11693). Agency: UNDP. GEF Project Financing: \$5,509,453; Co-financing: \$59,400,000.

✓ **Germany Comments**

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

- In relation to project component 1, Germany welcomes the approach of addressing drivers of biodiversity loss (e.g. mining, agriculture/fisheries/forestry) through mainstreaming biodiversity into the relevant sectors by intersectorial cooperation. Nevertheless, the methodological approach to this ambitious goal still needs more clarification. The outcomes

focus strongly on the production of guidelines, coordination meetings and mainly within the spatial planning unit. Thus, Germany suggests broadening the scope and identify further entry points for an intersectorial biodiversity mainstreaming approach, and clarifying which other concrete innovative approaches could be used.

- Germany suggests prioritizing the (institutional and financial) sustainability of those approaches (beyond the project period). This could be especially relevant for issues of participation, capacity development, biodiversity mainstreaming, and financing. This could serve as guiding principle for the set-up of any project measure during the project implementation.
- Germany asks to add information on main lessons from BIOFIN for this intended project (cf. Outcome 1.4).
- Germany welcomes the mentioning of the importance of participation of Indigenous Peoples and Local Communities as well as especially women. Germany considers the inclusion of IP&LC, the respect of their rights, including land rights and FPIC, and of their traditional knowledge, as well as the improvement of their livelihoods as a crucial factor of success in the implementation of conservation projects, from which the whole of society would benefit. Therefore, Germany asks to explain in more detail and more prominently the methodological approach on this topic in the proposal.
- Germany highlights that there are ongoing projects supported by GIZ in China, which are cooperating on similar topics with the Chinese government, e.g. with MEE. Germany recommends to consider synergies and cooperation potentials.

✓ **Japan Comments**

- Japan welcomes the work program, which realized almost equal formulation of projects in all 5 focal areas, while contributing to the implementation of different MEAs. We are, however, concerned that some projects with a large (almost 1:10) co-financing proposed by one country, such as ID 11548, 11693, and 11697, may have been inflated. We hope that this risk is taken into account in project designs, and recommend careful review to backcheck the proposed figures for co-financing as well as the value of the grants proposed.
- Furthermore, since some of the industry-related projects can be easily financed by risk-tolerant private capital, we need to consider additionality issues much more carefully. Considering the demarcation with the Non-Grant Instrument, those projects should be reviewed in order to ensure transparency and the regional balance.
- Regarding ID 11543: Life cycle management of plastics, the funds generated from private sector could be utilized to improve waste management, technological innovation, and/or product design. Further consideration should be given on the project based on data related to waste management. In general, we recommend considering whether it would be appropriate for countries with economic capacity as well as high levels of mismanaged plastic waste, to be eligible for GEF financing.
- We therefore request projects with these characteristics (ID 11543, 11548, 11693, 11697) to be subject to a second review by Council with more information before CEO endorsement.

- Furthermore, we suggest that these issues be taken into account in the next GEF 9 programming in relation to countries with sufficient access to global capital markets.

✓ **Norway & Denmark Comments**

- This project is considered particularly important with a view to knowledge exchange concerning biodiversity conservation through, among other things, integrated landscape management. Chinese authorities recognize that these are significant and important challenges that must be given high political priority. These are also issues that are discussed by Chinese authorities in various international forums, including the China Council for International Cooperation on Environment and Development (CCICED), which Norway has supported for several years.
- It is also worth mentioning that Norway has its own bilateral cooperation project with China aimed at strengthening Chinese capacity for biodiversity conservation in light of climate change. The Norwegian Environment Agency is the project leader and works closely with the Nanjing Institute of Environmental Sciences. UNDP, in their role as project owner, should ensure good coordination with other multilateral and bilateral development partners managing similar projects in China.

More specific comments:

- There is a thorough background analysis, solid coordination across involved sectors, and good integration of project preparations between authorities at national, provincial, and municipal levels. On the Chinese side, a project like this would typically involve many public agencies at various levels of the authority hierarchy. It is therefore crucial to ensure good consultations and solid coordination both during project preparations and implementation.
- UNDP highlights the importance of involving the private sector. We would like to see a more detailed description in the project proposal of how the private sector will be involved, what types of companies will be involved, and the criteria for selection, etc.
- The project proposal generally discusses the importance of mobilizing private capital to scale up initiatives around natural resource conservation. More details should be provided in terms of what is planned to be achieved such as capital mobilization.
- The risk related to climate change is mentioned, but it could be considered whether there is a need for a more explicit assessment of possible climate change effects for each pilot.

7. Brazil. Integrated Landscape Management for Biodiversity Conservation and mitigating Climate Change in the Caatinga - Conecta Caatinga (GEF ID 11565). Agency: Funbio; GEF Project Financing: \$5,504,588; Co-financing: \$17,000,000.

✓ **Germany Comments**

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

- Germany proposes to include co-creative stakeholder processes, which enable stakeholders (especially women and youth) to co-develop the update and enhancement of the regulatory and policy environment (ref. to component 3).

- Germany asks to add gender transformative approaches to the foreseen activities, next to focusing on the active participation of youth and women. Those should target men and aim towards transforming underlying social structures, policies, systems and norms that perpetuate gender inequalities (ref. to components 1 and 2).

✓ **United Kingdom Comments**

- The project approaches a critical biome for Brazil (Caatinga), promoting biodiversity conservation and social development (including IPLC involvement and a gender lens) in a context of increasingly exposure to desertification.
- It strongly relates to Brazil's recent interest in the UN Convention to Combat Desertification (UNCCD) (e.g. Minister Marina Silva potentially attending UNCCD COP16 for the first time) and to our forest strategy at post (increasing our engagement with other biomes than the Amazon, e.g. Caatinga).
- The project also seems well positioned in terms of national policies and incentives, e.g. the Ministry of Environment has recently launched the National Plan for Recovering Native Vegetation (PLANAVEG), and the Ministry of Agriculture and Livestock is promoting the National Programme for Degraded Pastures.

Challenges:

- The project will emphasize sustainable management outside protected areas - so our understanding is that it will work with landowners (private rural properties). In this sense, it might face barriers related to Brazil's Forest Code compliance (e.g. landowners lacking their environmental registries/general land tenure documentation). This is both a challenge and an opportunity to scale-up the project's impact. Would be interesting to further investigate how the project will engage landowners regarding compliance and whether the environmental rural registry would be part of the eligibility criteria to involve them.
- The UK has previously supported a significant project with similar purposes (PRS Caatinga), so we have some lessons learned regarding legacy and exit strategy. We know it's challenging to enable transformative and long-term impact once implementation is over. Could be interesting to ask what the project exit strategy is.

✓ **United States Comments**

- The United States appreciates the focus on biodiversity in this project, though notes the project proposal could provide a more detailed action plan.

8. Indonesia. Strengthening the integrated landscape management and governance for the conservation and sustainable use of forested areas important for biodiversity and ecosystem services (AIBDES) in Indonesia (GEF ID 11530). Indonesia. FAO. GEF Project Financing: \$7,105,936; Co-financing: \$56,000,000.

✓ **Germany Comments**

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

- Germany proposes to exchange with the new GCF project in West Kalimantan, which will also address HCV/HCS areas, e.g. about the Provincial Regulation (Perda 6 / 2018), which obliges the private sector (concessions) to place part of their commercial areas (7%) under protection, which would contribute to Output 1.
 - The success of the program depends on the cooperation with the MoEF (BPPE and KSDAE). However, Germany proposes to additionally involve the provincial forest administration (Dinas Kehutanan and the Forest Management Units) and the Regency Government.
 - Germany suggests considering the establishment of a scalable financial mechanism for forest protection including forest outside state forests to meet the assumption A3.
 - The involvement of indigenous peoples could be elaborated more prominently and more specifically, e.g. in relation to activities to strengthen the rights of indigenous people, support in obtaining land titles or the recognition of indigenous people (Masyarakat Adat / Wilayah Adat).
 - Germany asks to clarify the connection with the Indonesian timber legality assurance system (SVLK), the collaboration with the private sector and possible support in certification.
 - Germany welcomes the project's intention to improve governance structures and their effectiveness, to involve communities and to enhance inter-agency and inter-regional coordination. Germany recommends conducting corruption risk assessments and directly supporting Indonesia's efforts against corruption in the forestry sector.
 - Germany recommends strengthening national beneficial ownership requirements and fostering integrity and compliance to regulations in the private sector.
- ✓ **United Kingdom Comments**
- With the objective of conserving biodiversity outside of protected forest areas together with large private sector companies and state-owned enterprises, the project would positively contribute to the new Indonesian government's targets of rehabilitating 12,7 million hectares – support that would be very welcome.

CHEMICALS AND WASTE

9. **Ukraine. Hazardous Waste Management and Policy Development Project for Ukraine (HWM-PDU) (GEF ID 11712); Agency: World Bank; GEF Project Financing: \$7,214,612; Co-financing: \$38,775,000.**

✓ **Germany Comments**

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

- Germany sees the urgency and need for the project and supports its objective and the planned cooperation with existing projects. However, the PIF does not adequately reflect the concrete technical options and preconditions for safely managing the hazardous PCB,

mercury and asbestos waste. Germany asks for more technical details in the project description, including on options for facilities such as incineration plants for hazardous waste. The options mentioned under sub-component 3.2 have proven to be insufficient in other countries and contexts.

- Germany recommends that corruption risks and mitigation measures be considered in the project risk section due to the high vulnerability to corruption and severe consequences of corruption regarding hazardous waste management.
- Germany welcomes the proposed contracting of the NGO “Living Planet” to assist the MEPR and suggests identifying an additional institution with first hand operational experience in Hazardous Waste Management, as technical experts are needed to assess the risks, priorities and planning the necessary measures. Alternatively, if the NGO provides that expertise, please clarify in the PIF.
- Germany also suggests including an organized exchange and cooperation with an EU member country, which has improved hazardous waste management in the past and can share relevant experience.
- As the removal of hazardous waste elements has taken more than 20 years in EU countries, please include a longer-term vision including suggested follow up activities, such as scientific support beyond the project duration.
- Germany welcomes the stocktaking proposed in component 2 and suggests using the results for prioritizing the most urgent.
- Germany recommends considering more time for developing a baseline study, need assessment or gap report in phase 1 of the project.
- Indicator 9.5 measures low/no chemical systems, but there are no respective activities included in the PIF. Please include sustainable chemistry activities.

✓ **Switzerland Comments**

- Under which conditions, if any would the project have to be stopped? In our view it would be advantageous if the project formulated and defined clear criteria to this end.
- What are the capacities and training requirements and how will and can a possible shortage of skilled personnel be handled by the project?
- What could be done to improve the availability of skilled personnel in this area and how can capable people be motivated to work with the project or in the hazardous waste management?

✓ **United States Comments**

- The United States appreciates the opportunity to review this project and notes that the emphasis on the disposal of hazardous pollution is timely in Ukraine. The complexity of implementation of this project is exacerbated by the war in Ukraine, which the project documents do address. We recommend they include more detail on project management and a monitoring plan.

10. Brazil. Environmentally sound management and disposal of excess mercury and mercury waste from removing mercury electrolytic cells in Brazil's chlor-alkali sector (Chlor-alkali Brazil) (GEF ID 11697); Agency: UNEP; GEF Project Financing: \$12,000,000; Co-financing: \$344,250,000.

✓ **Germany Comments**

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

- Chapter 2.1 reviews several barriers, including a “shortage of financial and economic support for final mercury disposal”. However, this barrier is not elaborated upon as thoroughly as others, nor is it mentioned in the Theory of Change. Germany requests additional details on how to address this barrier and an explanation for its omission from the Theory of Change.
- The investment required for the technology conversion of chlor-alkali mercury cells is estimated at USD 344 million (see page 30) to be co-financed by the private sector. The availability of major investment is identified as a moderate risk, stating that “project partners and national counterparts may not sustain activities including co-financing commitments”. As a mitigation measure, the proposer explains that the executing agency (EA) has “extensive experiences in handling such initiatives”. Germany requests an elaboration on the EA’s experiences. Additionally, Germany requests the incorporation of mitigation strategies in the project concept, including criteria for a project exit, if private sector parties fail to perform. Germany is concerned that low commitment by the private sector poses a major risk to the overall objective and may lead to greenwashing.
- One of the key objectives of component 2 is stated as “...will focus on supporting the decommissioning of the mercury cells and converting the plants” (see page 17). However, this objective is not supported by any output – the only output under component 2 refers to collection of excess mercury and mercury-contaminated materials. The overall objective relies on the decommissioning of mercury cells, as this addresses a beginning of pipe problem. Germany requests the definition of an additional output to ensure the decommissioning of mercury cells and the monitoring of the conversion process.
- Project component 2 refers to “introducing BAT/BEP during decommissioning of mercury cells and following technology conversion of three plants”. Germany highly appreciates the utilization of the BAT/BEP process. However, Germany requests clarification on the specific BAT/BEP reference document for chlor-alkali production cited in the proposal. Furthermore, Germany seeks clarification on whether the BAT/BEP process for chlor-alkali production has already been introduced in Brazil.
- The introduction of mercury-free technologies is classified as a moderate risk (see page 25) as it “entails several technological risks, including feasibility, maintenance reliability, availability of technology and service providers for mercury waste and contaminated and remediation, mercury stabilization and disposal and cost implications for the chlor-alkali sector”. The proposed mitigation measures are very generic and lack a clear strategy for technology transfer. Moreover, for drivers of inaction and barriers under chapter 2.1.3 the proposal only mentions remediation, stabilization, transport and storage services for

mercury but does not refer to barriers for mercury-free technologies. Germany requests to evaluate if there is an additional technical barrier to the introduction of mercury-free technologies.

✓ **Japan Comments**

- Japan welcomes the work program, which realized almost equal formulation of projects in all 5 focal areas, while contributing to the implementation of different MEAs. We are, however, concerned that some projects with a large (almost 1:10) co-financing proposed by one country, such as ID 11548, 11693, and 11697, may have been inflated. We hope that this risk is taken into account in project designs, and recommend careful review to backcheck the proposed figures for co-financing as well as the value of the grants proposed.
- Furthermore, since some of the industry-related projects can be easily financed by risk-tolerant private capital, we need to consider additionality issues much more carefully. Considering the demarcation with the Non-Grant Instrument, those projects should be reviewed in order to ensure transparency and the regional balance.
- Regarding ID 11543: Life cycle management of plastics, the funds generated from private sector could be utilized to improve waste management, technological innovation, and/or product design. Further consideration should be given on the project based on data related to waste management. In general, we recommend considering whether it would be appropriate for countries with economic capacity as well as high levels of mismanaged plastic waste, to be eligible for GEF financing.
- We therefore request projects with these characteristics (ID 11543, 11548, 11693, 11697) to be subject to a second review by Council with more information before CEO endorsement.
- Furthermore, we suggest that these issues be taken into account in the next GEF 9 programming in relation to countries with sufficient access to global capital markets.

✓ **United Kingdom Comments**

- Important to ensure the project will not impact indigenous people and local communities' land. Areas with mercury are known by its poverty and low level of development.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project and is grateful to see the commitment to follow international best practices for disposal of mercury.

11. Global. Chemicals and Wastes Financing Partnership Facility (CWFPF) (GEF ID 11681); Agency: ADB, UNIDO; GEF Project Financing: \$29,083,000; Co-financing: \$ 300,800,000.

✓ **Germany Comments**

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

- Germany suggests including a more detailed discussion on how the project contributes to the implementation of the Global Framework on Chemicals (GFC), for instance by pointing out the links between the project and specific GFC strategic objectives and/or targets.
- Building upon the recommendations of the STAP, Germany asks to delineate the output formulation more clearly. For instance, output 1.1 “Policy barriers on C&W management (...) identified and strategies to address these barriers developed” appears very abstract and vague – at which governance level, in which countries/regions, through which instruments will this be achieved? Output should be reformulated in analogy to output 4.1., making the activity more specific and measurable.
- Germany welcomes the innovative financing mechanism to create a dedicated financing facility (CWFPF) tailored to chemicals and waste management. It leverages partnerships between development banks and technical agencies and thus combines technical expertise with financial resources. Germany recommends establishing an independent oversight and transparency mechanism for fund management and decision-making.
- Considering the project’s complexity of governance, financial flows, and stakeholder engagement, Germany recommends considering corruption risks across the project cycle as well as mitigation measures in the project risk section.

✓ **Japan Comments**

- Some aspects including actual outcomes by the pilot project, countries implemented for the pilot project, relationship with pilot project facility, scope implementation mechanism, financing to the ADB project are not clear.
- Anticipating project of ADB co-financing is unclear.
- If the facility intends to finance the ADB pipeline project only, it should be a regional rather than global project.

✓ **United States Comments**

- The United States encourages the project implementors to avoid duplicating existing funding programs such as the Global Framework on Chemicals Fund (GFCF), the Special Programme – which supports institutional capacity development for countries implementing the BRS Conventions, Minamata Convention, and Strategic Approach to International Chemicals Management/Global Framework on Chemicals – and the Specific International Programme to support capacity building and technical assistance (SIP) under the Minamata Convention.
- We note the proposal does consider these MEAs and voluntary instruments, but states that, while existing mechanisms have reduced some risks, progress has been uneven. The justification for the proposal does not convince us that creating a new fund facility/partnership is necessary as opposed to working within the existing financial mechanisms already available in the chemicals and waste cluster.

12. China. Life Cycle Management Project in Plastic Industry in China (GEF ID 11543); Agency: UNDP; GEF Project Financing: \$20,265,000; Co-financing: \$182,385,000.

✓ **France Comments**

- Overall, the project does not appear to adopt a life cycle approach as activities on reducing the use of plastics and plastic products and promoting alternatives to plastic are not presented. The project rather appears to focus on waste management and eco-design, but with a focus on maximizing the share of recycled material, designing a unique material for packaging and adopting other design measures to make the plastic production process more circular. **The project should focus on reducing the use of plastic at the source and promoting these alternative solutions.** Upstream activities could therefore be added to close the loop, including activities on behavioral change and supporting the development, access and adoption of alternatives.
- The GEF Sec will need to ensure that the project is further detailed to achieve its objectives, including:
 - The proposal should specify the scope of the project (sectors, activities). Will primary plastic production and plastic additives sector production be integrated?
 - At this stage, it is difficult to assess the impacts of the project: the scope and intent need to be clarified. It is not yet clear whether the proposed activities are truly aligned with the project objective, namely to eliminate the production and use of problematic and avoidable plastics and to reduce and prevent the release of toxic and hazardous chemicals.
 - Component 2 should provide more details on the types of demonstration projects envisaged (in particular for points 2.1 and 2.2). We understand that the selection criteria for provinces and companies will be defined at the PPG stage, but details on the pilot projects and activities should also be provided. The project should also clarify what is meant by “green packaging” and what replacement product will be promoted.

✓ **Germany Comments**

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

- Germany recommends to harmonise the project approach with the principles of the waste hierarchy and strengthen its approach towards the prevention of plastic (waste) and the introduction of circular alternatives to plastic, in particular reuse models where possible.
- The project's contribution to the prevention of plastic pollution, including in the marine environment, and thus to the international plastics treaty currently under negotiation, could be improved by focusing on the reduction of releases and leaks of plastic products, including pellets, flakes and powders, as well as microplastics into the environment and aquatic systems. In addition to POPs, the project approach should consider other hazardous substances and chemicals of concern, including intentionally added microplastics, that pose a risk to human health or the environment. Abandoned, lost or otherwise discarded fishing gear (ALDFG) related and port waste management approaches have shown to increase the

effectiveness of project approaches towards reducing pollution and thus could be incorporated where suitable.

- Lack of funding for circular plastics solutions and practices is a significant bottleneck. Germany recommends to the project's ambition by piloting financial instruments and demonstrating their scalability, as identified in the study (Outcome 3.1).
- Germany notes that trade-related issues and policies are not explicitly addressed in the project proposal. The effectiveness of the project could be enhanced by incorporating trade-related policies. This could typically include, without being prescriptive, requiring producers, importers and exporters of plastic products to also ensure design and production standards and the establishment of adequate and reliable information systems on chemicals used in plastic products along the different value chains, and to take appropriate measures to ensure the traceability of chemicals, including in plastic products and waste.

✓ **Japan Comments**

- Japan welcomes the work program, which realized almost equal formulation of projects in all 5 focal areas, while contributing to the implementation of different MEAs. We are, however, concerned that some projects with a large (almost 1:10) co-financing proposed by one country, such as ID 11548, 11693, and 11697, may have been inflated. We hope that this risk is taken into account in project designs, and recommend careful review to backcheck the proposed figures for co-financing as well as the value of the grants proposed.
- Furthermore, since some of the industry-related projects can be easily financed by risk-tolerant private capital, we need to consider additionality issues much more carefully. Considering the demarcation with the Non-Grant Instrument, those projects should be reviewed in order to ensure transparency and the regional balance.
- Regarding ID 11543: Life cycle management of plastics, the funds generated from private sector could be utilized to improve waste management, technological innovation, and/or product design. Further consideration should be given on the project based on data related to waste management. In general, we recommend considering whether it would be appropriate for countries with economic capacity as well as high levels of mismanaged plastic waste, to be eligible for GEF financing.
- We therefore request projects with these characteristics (ID 11543, 11548, 11693, 11697) to be subject to a second review by Council with more information before CEO endorsement.
- Furthermore, we suggest that these issues be taken into account in the next GEF 9 programming in relation to countries with sufficient access to global capital markets.

✓ **Switzerland Comments**

- How, to what extent has the Government's buy-in for the project's objectives and goals been secured?
- The expected amount of plastic reduced during the project is not transparent and substantiated. Could you provide more information?

- The envisaged co-financing through the private sector is impressive, but it is not substantiated and it could be challenging to ensure, that the invested funds from the companies are really used for new recycling technologies, the production of more environmentally friendly plastic and not just to increase production capacity. How does the project envisage addressing this challenge/risk?

CLIMATE CHANGE

13. India. Accelerating sustainable energy transition for decarbonization of micro, small and medium manufacturing enterprises in India (GEF ID 11758). Agency: UNIDO; GEF Project financing: \$8,982,420; Co-financing: \$71,190,000.

✓ Germany Comments

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

- Germany appreciates the focus on MSMEs, which are the backbone of India's economy and often face unique financing challenges. To address these barriers, the proposal includes innovative financing mechanisms such as blended finance facilities and risk-sharing instruments. To maximize the initiative's impact on promoting energy efficiency, it is recommended that the scope be expanded to include MSMEs nationwide.
- The initiative also supports the inclusion of women in the industrial workforce by providing training to professionals, with a target of at least 30% female participation. To align with UNIDO's principles on gender equality and women's empowerment, which advocate for women in leadership positions, Germany suggests to incorporate activities that strengthen female leadership within the Indian MSME sector. Furthermore, the social impact could be enhanced by including other underrepresented or vulnerable groups, such as ethnic minorities, as beneficiaries.
- Within the initiative, the use of hydrogen is permissible, with a commitment to focus exclusively on green hydrogen, defined as having a carbon footprint of less than 2 kg CO₂ equivalent per kilogram of hydrogen according to the Green Hydrogen Standard for India. Given that the direct use of solar and wind power is more efficient, discussions during the Project Preparation Grant (PPG) phase should prioritize the direct use of these renewable energy sources over green hydrogen. Additionally, since waste heat recovery is eligible under the project proposal, it is crucial to ensure that the underlying energy generation is derived from renewable sources.
- Germany proposes alignment with ongoing activities: For example, the GIZ is currently implementing the project Promoting Energy Efficiency in Indian Industry, which includes support for the steel and paper sectors. The German financial cooperation (KfW Bank) also addresses energy efficiency in various areas, including households, industries, and buildings, through different projects. Germany suggests close cooperation on technical and financial assistance to achieve greater collective impact.

✓ **United Kingdom Comments**

- **Focus sectors:** I think there is a slight mismatch between the the table states chemicals and waste as two focus areas whereas the writeup includes 8 sectors.
- **Buy in:** Would be useful to have the buy in from the Ministry of Power and BEE (nodal organisation for EE in India under MoP)
- **Existing programmes in India:** We have done a lot of good work under ASPIRE and UK PACT in these 8 identified industrial sectors (both heavy and small). Hence it would be helpful to know how this programme progresses to ensure there are no overlaps and collaborative opportunities are identified and taken forward. The proposal emphasises leveraging existing platforms with IDEEKSHA (developed under ASPIRE and to be taken forward by MoP) being an ideal choice to advance the programme’s objectives.

14. Regional (Dominica, Grenada, Saint Kitts and Nevis, Saint Lucia, Suriname). Strengthening national capacities for implementing the Enhanced Transparency Framework in Caribbean countries (GEF ID 11675). Agency UNEP; GEF Project financing: \$6,750,000; Co-financing: \$375,000.

✓ **Germany Comments**

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

- Germany recommends more information on the measures taken that ensure programme structures are persisting after the termination of GEF project financing.

✓ **United Kingdom Comments**

- Much needed integration of systems to provide high quality climate information for reporting and decision making. Given the siloed nature of data and information in Caribbean governments a major focus will need to be on buy in and ownership of the platform in each country to make sure that what ever is designed and built is used by key stakeholders. This can be a sensitive issue so the partners will need to pay close attention to those dynamics to get it right.

✓ **United States Comments**

- The United States appreciates the opportunity for the Caribbean SIDS to share experiences and data to focus on areas where there is not yet significant support for transparency reporting.

INTERNATIONAL WATERS

15. Regional (Kenya, Tanzania). Unlocking the Groundwater Potential of the Kilimanjaro Water Tower (GEF ID 11547). Agency: FAO; GEF Project Financing: \$7,105,936; Co-financing: \$56,500,000.

✓ **Germany Comments**

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

- The proposal lists Managed Aquifer Recharge (MAR) and specifically the reforestation and protection of the cloud forest as a counterweight to the planned groundwater extraction to enable a sustainable use of the resource. Germany requests the quantification of the potential recharge rates and extraction numbers for a sustainable groundwater use.
- Germany asks to mention the key drivers behind the increase in water demand next to a growing population (potentially agriculture, tourism industry, etc.) and to consider potential measures to reduce the water usage of the region.
- Germany recommends to include how a “heightened awareness of climate change impacts on water resources” and thus, a prioritization of aquifer protection but is achieved.
- Barrier IV lists the lack of modern groundwater monitoring networks and describes a fragmented outdated system not just on the basin level where the project takes place, but on a national level (Kenya and Tanzania respectively). Germany asks how the project will tie into already existing plans to modernize these networks.
- Germany asks to stronger reflect Driver 2 (increasing demand) in the theory of change.

✓ **Switzerland Comments**

- Apart from facilitating dialogue between technical experts and inter-ministerial representatives of the two countries, is the scope/interest for specific peer-to-peer exchanges practical issues of mutual relevance for the respective counterparts, and even more promising for broader peer advice / twinning arrangements beyond the countries with counterparts on the continent having dealt (recently) with the same issues in similar contexts?
- How far will the Project seize the opportunity to support the development of state-of-the-art technologies (e.g. on artificial recharging of groundwater, solarisation of groundwater extraction and assessment of aquifer vulnerability/replenishment using isotopes), whilst building on the international community and networks to bring the applied research to mainstream?
- Do you see a potential to build upon insights and experiences from past or continued regional/continent-wide initiatives such as AMCOW’s Pan-African Groundwater Program, UPGro, the SADC-GMI or even the IUCN-BRIDGE (not referenced to in the PIF) and if so, do you plan on exploiting it and how?

16. Regional (Colombia, Dominican Republic, Grenada, Jamaica, Panama, Saint Lucia, and Trinidad and Tobago). Promoting the Integrated Management of Sargassum: Building Resilient Tourism and Fisheries Sectors through the Conservation of Marine Ecosystems in Caribbean countries (SargMarine) (GEF ID 11526). Agency: CAF; GEF Project Financing: \$10,000,000; Co-financing: \$76,300,000.

✓ **France Comments**

- The SargMarine project aims to establish an integrated regional governance framework to manage sargassum flows in the countries of the CLME region (Caribbean and North Brazilian

Large Marine Ecosystems). It responds to the environmental emergency and highlights the challenges and opportunities that this represents for marine ecosystems, local communities, and key economic sectors such as tourism and fisheries.

- Objectives: Strengthen regional governance; improve decision-making and planning; promote economic and sustainable solutions; strengthen knowledge management.
- Points to pay attention to: This project is very, very redundant with initiatives already underway (in particular the regional sargassum program of EF, EUROCLIMA program in DR on the integral management of sargassum by GIZ/AECID, etc.). Having the same actions in the same country can become counterproductive, so be careful to articulate well or to leave management to other entities. Component 3 is, however, very interesting: Promotion of blue growth initiatives and the development of the blue economy through investments in Sargassum recovery companies (a whole support to improve the decision-making of political decision-makers and financial institutions on viable solutions; with the establishment of a special fund for the recovery of Sargassum to develop new markets)
- The GEF Sec will have to ensure that:
 - The project is correctly articulated with the many other projects and programs existing on Sargassum on the type of activities and the geographical scope, even if it means revising them.

✓ **Germany Comments**

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

- Germany notes significant overlaps between the project’s objectives and other initiatives in the Caribbean, including activities in similar target areas (e.g. Grenada, St. Lucia) and focus areas such as the regional framework for Sargassum and the promotion of pilot projects and sustainable business models. To maximize synergies and avoid duplication, Germany strongly recommends close coordination and alignment with ongoing or planned activities, including:
 - Two small scale projects: *Research and advice on the challenges of the increase in brown algae of the genus Sargassum in the Caribbean* and *Knowledge transfer and strengthening of laboratory capacities to promote research on Sargassum and biowaste utilization in the Caribbean* implemented by GIZ on behalf of the BMZ.
 - [Euroclima – Promoting a ‘Green and Just Transition’ in Latin America and the Caribbean, in the framework of which](#): GIZ is elaborating a regional study (Dominican Republic, Grenada, St. Lucia and Barbados) on “*Evaluation of the productive use of Industrial Organic waste & Sargassum through Biogas Technology or Composting*”.
 - A new regional project “*Material and Energetic Utilization of Organic Waste and Sargassum - BioWaste Caribbean*” implemented by GIZ on behalf of the BMZ.
 - AFD “Sargassum regional management and coordination project- Caribbean” starting in January 2025

- Germany appreciates the comprehensive list of stakeholders that the project aims to include. However, the involvement of various political partners (OAS - CAF, OECS - AFD and CARICOM - GIZ) may pose challenges to seamless cooperation and information exchange.
- Germany appreciates the ambition behind the proposed co-financing. However, Germany notes that achieving this financial target might present challenges, given the complexity and the multiple parallel initiatives. Germany suggests a thorough review and potential adjustment of the financing strategy to enhance feasibility.
- Germany values the focus on bioeconomic opportunities but would like to request clearer details on how environmental and social impacts, such as arsenic contamination, will be assessed to avoid negative impacts on ecosystems or communities.

✓ **United Kingdom Comments**

- Sargassum management is of critical importance to Caribbean SIDS. Blooms can lead to significant economic losses, environmental damage, and challenges in its management. We are supporting some small initiatives to identify alternate uses and management of sargassum. The regional approach is sound as there are several actors in the space so it will be important for the implementers to scan the landscape and ensure they are not duplicating efforts but rather ensuring they are all linked up.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project and supports the focus on Sargassum seaweed management. We note the project does not mention implementation of best practices such as collection at sea (before it reaches beaches) or cold storage, which we would encourage the project implementors to consider.

17. Regional (Chile, Ecuador, Peru). The Digital Seafood Revolution: Electronic catch documentation and traceability systems (eCDT) for sustainable and legal fisheries in Chile, Peru, and Ecuador (GEF ID 11674). Agency: UNEP; GEF Project Financing: \$8,000,000; Co-financing: \$80,079,269.

✓ **Germany Comments**

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

- Germany welcomes the integration of artisanal fisheries in the project proposal. However, we recommend that their structural integration into the project could be stronger. Currently their role in the proposal appears to be limited to the function of data providers neglecting their essential socio-economic role in these countries. Germany suggests including a robust path how the project will respond to the needs of fishers with limited technological affinity and access, who are likely excluded in many situations under present conditions of low connectivity in rural areas and how to ensure equitable long-term access to eCDTs and the data generated for actors in artisanal fisheries.
- Germany strongly suggests to rely on small-scale fisheries and gender-sensitive guidelines in the development and implementation of the proposal, foremost the 2014 FAO Voluntary

Guidelines for Securing sustainable small-scale fisheries in the context of poverty eradication and food security and related relevant handbooks in support of them.

- Germany welcomes the proposal to include women through 50% gender-balanced training. However, considering that gender inequality is identified as one of the key barriers, Germany suggests integrating gender considerations more structurally in its proposal, outlining how the proliferation of eCDT systems could act as a structural vehicle to empower women and ensuring gender-inclusive eCDT tools.
- Germany suggests considering the integration of additional system benefits right from the start, e.g. monitoring for climate change impact and worker welfare at sea, to integrate synergies with climate change adaptation and social improvements.
- Corruption in the fisheries sector is mostly linked to illegal, unreported, and unregulated (IUU) fishing, affecting the entire fisheries value chain. This encompasses corrupt activities such as obtaining fraudulent licenses, falsifying records, and evading inspections. Chile, Ecuador, and Peru have all experienced corruption cases within their fisheries sectors.
- Germany recommends including corruption risk assessments and the development of mitigating measures in the project designs at country level, giving local civil society stakeholders a role in planning and monitoring. Germany also recommends using transparency standards and principles like the Fisheries Transparency Initiative (FiTI) to achieve a responsible fisheries governance and to reduce upcoming corruption risks. UNODC's [guide on addressing corruption in the fisheries sector \(2019\)](#) helps policymakers identify and address corruption risks in fisheries management, raise awareness among authorities, and provide strategies to reduce and prevent corruption.

✓ **United Kingdom Comments**

Ecuador

- This project aims to support the three countries in addressing IUU by harmonizing their eCDT systems for local fisheries and global markets, strengthening cooperation for policy coherence and engaging various actors across the value chain. This initiative is particularly beneficial for Ecuador, which has been sanctioned by the EU with a yellow card, restringing access to the European market due to concerns over underreported fishing activities. The project will play a vital role in Ecuador's efforts to lift this sanction, which requires enhanced transparency and compliance with international standards for fisheries management.
- Moreover, this project proposal is especially significant for Ecuador because fisheries is a cornerstone of its economy and a key source of employment, particularly for vulnerable coastal communities. Ensuring this sector's stability and growth is essential to fostering economic resilience.
- However, some critical issues were overlooked in the project proposal:
 - **Organized crime:** coastal areas in Ecuador have faced persistent poverty and inequality, leaving local communities, especially artisanal fishers highly vulnerable to exploitation by organized crime groups. Over recent years, these groups have significantly expanded their influence, coercing artisanal fishers into illegal activities. This poses a risk to the

successful implementation of the project. The project proposal did not address how this risk will be mitigated.

- Hence, to strengthen the project design and ensure success, it is recommended to establish partnerships and cooperation with security authorities and other relevant stakeholders to develop strategies to manage this risk.
- 2. **Artisanal fishers and digital divide.** The project proposal emphasizes that these eCDT systems will be implemented all over the value chain and that artisanal fishers will play a central role in the establishment of this system as primary data providers. However, longstanding poverty has significantly limited these actors' access to technological tools, creating barriers that could impede their effective participation. The project proposal does not specify how this challenge will be addressed. Despite their critical importance to the project's success.
- To enhance project's effectiveness, it is recommended to establish partnerships with organizations specialized in building technological capacity. Such partnerships could help bridge the digital divide so that artisanal fisher can actively engage with and benefit from the system.
- These countries have been particularly affected by Chinese DWFs in the region, impacting enormously their marine ecosystems and even restricting access to markets that require transparency in their imports (just like Ecuador's case with the EU). Thus, projects like this that aim at improving coordination in cooperation efforts to enhance transparency, governance and enforcement in catch reporting are crucially needed to support the fisheries sector, so crucial for all three countries' economies and employment.

Chile

- We welcome the program "Electronic catch documentation and traceability systems (eCDT) for sustainable and legal fisheries in Chile" given the positive impact this could have on the country's fishing sector.
- There are two contentious/political issues which we think worth mentioning (below), however we don't think these issues should not affect the proposed program.
 - The importance of addressing illegal fishing in Chile in future programs. For instance, 456 tons of illegal catch were seized in 2022. This has significant consequences for marine ecosystem conservation. Illegal fishing depletes fish populations, destroy marine habitats and distorts competition (as well as reduces the tax income for the Chilean state).
 - Currently, the senate is discussing a fishing bill (approved in October by the lower house). This proposed law sets quotas between the artisanal and industrial fishing sectors, regulates and limits trawling (categorized as a practice with significant negative consequences for the marine ecosystem), among other proposed measures. The fishing bill also seeks to restore trust, as the current fishing law was marred by a corruption scandal (traffic of influence), which has undermined its legitimacy.

MULTI-FOCAL AREA PROJECTS

18. Liberia. Promoting Sustainable Land Management for the achievement of Land Degradation Neutrality for Improved Equity, Sustainability, and Resilience in Rice Landscapes of Liberia (GEF ID 11720). Agency: FAO; GEF Project Financing: \$5,114,019; Co-financing: \$37,582,973).

✓ Germany Comments

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

- Germany recommends to integrate the number or percentage of women in Outcome Indicator 2.1 target b).
- Germany asks to include corruption risk assessments and the development of mitigating measures in the project design at country level, involving local civil society stakeholders in planning and monitoring. Furthermore, add corruption as a possible key risk under Political and Governance.
- Germany requests to integrate the most recent regulatory frameworks, e.g. the Land Rights Bill (2014) and Land Rights Act (2018) under Output 1.1.2: Integration of lessons learned on SLM and LDN into land use-related policies.
- The Theory of Change lists essentially the same points for barriers and root causes. Germany proposes to add root causes described in the proposal, e.g. increase of population; climate change impacts such as temperature increases, more frequent extreme weather events; competing demands for forestry and agriculture leading to increased degradation, etc.
- Germany asks to address land tenure issues (add these as a key risk) and possible conflict resolution mechanisms if a change in land use is sought in the context of the project. This could be relevant for lowland yet to be developed (e.g. possible conflict of interests with mining activities, urban expansion, or cattle grazing) or reduced upland shifting cultivation.
- Germany asks to mention more detailed how/if the project will address a reduction of shifting cultivation encroaching into natural forest land, as promoting rice cultivation in lowlands will not automatically lead to reduced cultivation in highland areas.

✓ Japan Comments

- The JICA technical cooperation project, "Improving Rice Production for Smallholders Project (LibRice)", is being implemented from May 2021 to May 2025. Implementing agency is the Department of Regional Development and Research Extension (DRDRE) of the Ministry of Agriculture, and the target is Bong County.
- The LibRice project has developed the "LibRice Technical Handbook for Sustainable Lowland Rice Production" and is currently finalizing the Handbook. The "LibRice Technical Handbook for Sustainable Lowland Rice Production" prepared by the LibRice project could be useful for this GEF project.
- Reference:

- <https://www.jica.go.jp/Resource/project/liberia/002/index.html>

✓ **United Kingdom Comments**

- It is exciting and positive to see this climate and environment proposal for Liberia. As a relatively small Angolophone West African country with no British colonial shared history, HMG's footprint in Liberia is very modest and our Embassy (a VSEP) has no bilateral ODA allocation to help us reach our climate and nature aspirations here. We rely, therefore, on HMG's own CMPs and contributions to global funds such as this one to help us achieve our goals. This proposal is timely and relevant to Liberia. While the geography and socio-economy of Liberia makes it well-suited to agriculture, barriers around institutional and community capacity, bad roads, changing patterns of rainfall, and post-war housing, land and property (HLP) issues means that Liberia is far from filling its agricultural potential. We note that this proposal focuses specifically on rice. Rice is a politically-sensitive commodity in Liberia. It is the foodstuff of choice across the population (who particularly enjoy foreign rice, not the locally grown 'country rice') but around two-thirds of Liberia's rice is imported. The Liberian population is extremely sensitive to rice price changes. The Rice Riots of 14 April 1979 (which led to violent protest) are widely considered to be the catalyst that led to the overthrow of then-President Tolbert's regime in 1980, which itself led to the regime of Samuel Doe which resulted in Liberia's civil wars (which spanned the late 1980s to early 2000s). Overall, while we think this project is positive, especially in its efforts to think regionally regarding neighbouring Guinea and Sierra Leone, we note that does focus on a sensitive part of Liberia's agricultural sector. We therefore make the following recommendations:
 1. Include a further institution in the delivery architecture of this project (which is currently dominated by the Ministry of Agriculture and Environment Protection Agency) ideally one from the UN, Civil Society or academia which can take an independent and politically-neutral view, and contribute helpful tools such as a political economy analysis of rice production in Liberia.
 2. Ensure that all interventions are climate-smart for future generations, as Liberia is on the frontline of climate change.
 3. Try to ensure buy-in from the full range of Government institutions, including the Forest Development Authority, before starting activities.
 4. Factor in the risks and opportunities in HLP interventions (housing land and property rights), as these are often contested following Liberia's civil wars.

19. Fiji. Revitalizing Ecosystems for Sustainable Agriculture and Resilience in Fiji (RESAR) (GEF ID 11718). Agency: IFAD; GEF Project Financing: \$8,226,629; Co-financing: \$13,200,000.

✓ **Germany Comments**

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

- Germany recommends to elaborate how most promising climate-smart activities will be identified. To give an example, zero/limited pesticide usage isn't a climate-smart agricultural

- practice as such. It has been shown that the occurrence of pests and diseases will further increase under a changing climate. Therefore, it will be important to embed the reduction of pesticide usage in a concept of integrated pest and disease management and to ensure access to alternative pest management options (e.g. bio-pesticides, resistant crop varieties, forecasting).
- Germany recommends seeking exchange with the following GIZ projects:
 - [Improving Vanuatu's public finances and agricultural value chains](#) focusing on improving institutional capabilities of the relevant national authorities of Vanuatu in agriculture and trade development, contributing to enhanced service delivery in the coconut, cattle and fruits & vegetables value chains, facilitating the successful implementation of Vanuatu's Public Finance Management Reform Road Map
 - [Protecting coastal ecosystems in Pacific Island Countries](#)
 - To avoid straining already tight human resources, Germany recommends using existing multi stakeholder partnerships and make use of existing government and non-government networks, e.g. the iTaukei Affairs Provincial Conservation Officers, and Committees.
 - Germany suggests incorporating the use of traditional knowledge and revitalizing pre-colonial farming practices. For marine and coastal areas, it proposes leveraging Local Marine Managed Areas (LMMA) and the insights gained from these sites.
 - Germany recommends that, in the development of value chains and the promotion of products (Component 3), special attention be given to ensuring that both value chain development and associated marketing efforts reach the final consumer. While previous livelihoods projects supported women's groups in creating new products (such as oysters and mangrove honey), they did not assist with the marketing of these products. Future projects should prioritize researching and confirming markets for these products before initiating livelihood activities aimed at scaling up production. In-country and tourism or overseas consumers should be identified and confirmed prior to engaging in production and marketing efforts.

20. Colombia. Participatory restoration to improve the provision of ecosystem services and connectivity at the landscape scale in Colombia (GEF ID 11679). Agency: UNEP; Project Financing: \$18,103,569; Co-financing: \$82,668,594.

✓ **Germany Comments**

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

- Germany asks to elaborate how the project will address climate change and population changes as drivers of the problems the project wants to tackle on the project sites. This might be a prerequisite for the project to achieve its goals.
- Germany recommends to elaborate on a scaling strategy, which considers eventually differing socio-economic, political, and environmental contexts. In this context, execute in

greater detail how the project will tackle land tenure issues and competing land uses when scaling restoration activities.

- Germany asks to include a gender-responsive action plan, which details how indigenous groups and local communities, especially women and youth will be empowered for ensuring equity and meaningful participation.
- Germany requests to include corruption risk assessments and the development of mitigating measures in the project designs at country level, involving local civil society stakeholders in planning and monitoring.
- Germany requests to carefully analyse the institutional beneficiaries of the project to rule out conflicts of interest and corruption. Regulatory capture and corruption are significant problems in environmental (regulatory) institutions at both national and regional levels, such as CARs, where weak governance and corrupt licensing hinder the protection of property rights and ecosystems.
- Germany asks to remove GIZ in the list of "Indicative Co-financing" because Germany provides financial support to the project, but GIZ is not involved in its realisation.

✓ **Norway & Denmark Comments**

- The coastal areas in Colombia have exceptionally important ecosystems, and it is often noted that there is a lack of investment in nature conservation and restoration in these regions. Therefore, it is positive to see a larger project focusing on these geographical areas. The Caribbean coast, for instance, has several unique natural types, but has experienced significant deforestation and has several severely degraded ecosystems. The Pacific coast has a mega biodiversity that is unique on a global scale.
- There is also poverty and several marginalized groups in these areas, and it is positive that the project will benefit indigenous peoples and local communities. It will be important to work closely with Afro-Colombians, who constitute a large population group in several of these areas.
- Furthermore, it will be important that the project builds on the experiences of the local civil society and contributes to strengthening local communities and local bodies, as well as building on existing processes and plans.

✓ **United Kingdom Comments**

- They mention the Sustainable Cattle Ranching Programme ([GEF ID 3574](#)). The UK government supported the continuation of this programme and the alliance that was built to implement it ([GB-GOV-13-ICF-0020-SPS](#)). Good that they reference it as there are many lessons learnt and useful information that can benefit this new programme potentially.
- I would definitely advise that they include conflict sensitivity as a cross-cutting component. It is very useful in general, but also the areas they want to work on are highly biodiverse (and in the pacific remote), with many socio-environmental conflicts. Colombia is also implementing a peace agreement with the FARC and in peace negotiations with other

groups, and environment, particularly restoration strategy is also at the core of these peace efforts. Conflict sensitivity will support the delivery of the programme.

- Politically, I see value in the programme as I understand they aim to work with local authorities and civil society in Pacific and Caribbean regions. Local elections took place last year so new administrations are starting their mandate, which can benefit from support to link up the national restoration strategy with their local planning. It can make an impact if they plan factor in nature-based solutions.

21. Montenegro. Integrated management of multiple use landscapes/seascapes to promote biodiversity conservation, ecosystem restoration, improve land and marine productivity and economic benefits to local communities (GEF ID 11533). Agency: UNDP; GEF Project Financing \$5,594,293; Co-financing \$48,400,000.

✓ **Germany Comments**

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

- Germany welcomes the consideration to establish the legal basis for and potential establishment of OECMs. However, Germany requests that activities to establish new protected areas and conservation sites, such as NATURA 2000 sites, will be included in the project since potential NATURA 2000 sites are already identified. In addition, the sustainable use of natural resources through local communities is allowed in most protected area categories and conservation sites.
- Germany requests to improve the management of protected areas a management body with sufficient finances and clearly outlined roles and responsibilities is needed. Germany requests to include this as a risk in the proposal, especially for Ulcinj Salina, and to add and discuss mitigation measures.
- Germany welcomes that the project envisions CSOs' active roles in implementing the project activities. We request that relevant CSOs will also have active roles according to their aim to protect biodiversity and for improved management of the sites, in which the CSOs are working in and have expertise.
- Germany requests including local communities more actively in project preparation and implementation, as Germany deems their active participation and strengthening their livelihoods as very important.
- We suggest improving indicator (iv) under Outcome 3 as follows: "grazing" per se does not decrease biodiversity, therefore we suggest to change the wording to "overgrazing", and check if overgrazing or, on the contrary, abandonment of pastures and meadows, is the main cause of biodiversity loss in the project sites.
- Germany suggests following improvements under Component 3:
 - Please implement component 3 in close cooperation with the Environmental Protection Agency as responsible authority for environmental information systems. We support the

strengthening of the already existing Environment Information Portal as outlined in the respective outputs. Please re-assess if the planned budget under component 3 is sufficient to achieve proposed outcomes.

- To avoid duplication of activities, please consider already conducted trainings and existing monitoring protocols for Skadar Lake by the GIZ CSBL project and the BioMon study for Ulcinj Salina (CZIP, 2024). Please focus on possible integration of data into one EIS.
- We suggest the implementation of community-based biodiversity monitoring through local NGOs for stronger local ownership and sustainability.
- We acknowledge the envisioned trainings and use of UN Live Platform, but request to see also the use of NATURA 2000 network reflected in the proposal, e.g. under Output 3.3., and training of Environmental Protection Agency staff in this regard.
- For monitoring activities, we suggest including innovative approaches and the strong use of digital tools and artificial intelligence solutions.
- Germany suggests seeking out close coordination during project implementation to other bilateral and multilateral projects and to include references to the following ongoing bilateral project to realize synergies: "[Skadar/Shkoder Lake Watershed - a Transboundary Biosphere Reserve](#)", which started in 02/2023 and supports i.a. protected area authorities of Skadar Lake in conservation and monitoring efforts.
- Germany suggests addressing mentioned barriers on public support for nature conservation more directly through awareness raising, conservation literacy, engagement activities and knowledge sharing tools by including these measures more prominently throughout the proposal, especially in components 1 and 2. In addition, Component 4 reads as a "post-project" measure, since its focus is on lessons learned from the project. Germany suggests revising this component to have awareness raising and communication activities from project preparation and throughout its implementation.

✓ **Japan Comments**

- As part of the technical cooperation project "Project on Capacity Building for Disaster Risk Reduction through National Forest Fire Information System (NFFIS) and Eco-DRR", one of the demonstration and exhibition activities for Eco-DRR (disaster prevention and mitigation using ecosystems), activities related to the conservation and management of coastal forests that take into account ecosystem services are being carried out at Long beach in Ulcinj, Montenegro (project period: 2021/3/2 - 2026/3/1). The project team is currently supporting the development of a conservation and management plan called "Coastal Ecosystem Management Plan in the Long Beach in Ulcinj" (to be completed in October 2025). It will be possible to collaborate with UNDP Montenegro, the implementing agency, not only in terms of this management plan but also in terms of providing related information, approaching neighboring areas, and scaling up.
- Reference:
 - <https://www.jica.go.jp/oda/project/1900386/index.html>

22. Tanzania. Integrated Landscape Management for Sustainable Ecosystem Services and Community Livelihoods in Wami-Ruvu River Basin (GEF ID 11407). Agency: UNEP; GEF Project Financing: \$5,329,452; Co-financing: \$27,893,250.

✓ **Germany Comments**

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

- The PIF rightly states multiple times the importance of ecosystem health. Germany recommends to include the fact that healthy ecosystems are also critical for human and animal health, thus linking to the One Health approach.
- The narrative that a decreasing rural population would reduce pressure on natural resources can be misleading. Germany asks to reflect the potential negative externalities of urbanisation for surrounding sub-urban and rural areas.
- Germany asks to explain more clearly how the project will deal with institutional fragmentation and shared responsibilities of different ministries regarding the basin planning.
- Germany asks to address the inclusion of pastoralist communities, especially in view of lacking access to and ownership of land titles in these communities.
- Germany asks for a description of possible risks and mitigation strategies that might come with establishing alternative water supply solutions that aim at decreasing the pressure on water resources in key biodiversity areas.
- Germany asks to address and differentiate gender inclusive activities and gender transformative approaches more clearly and in detail.
- Germany recommends to incorporate local and indigenous knowledge in the project design and implementation. Germany asks for clarification how local authorities and water user associations planning to monitor the long-term application of introduced measures, after the project has ended. Further, the PIF should address more the plans to ensure long-term sustainability of its planned activities.
- Germany asks to reflect more on ongoing donor activities in Tanzania, including in the Wami-Ruvu basin to ensure donor coordination, synergies, and alignment between different activities.

NON-GRANT INSTRUMENT

23. Regional (Africa). Green Mobility Financing Facility for Africa (GEF ID 11671). Agency: African Development Bank; GEF Project Financing: \$13,461,468; Co-financing: 547,450,000.

✓ Germany Comments

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

- Germany recommends emphasising how project activities can also work towards advancing digitization measures in E-Mobility projects in all the 6 pilot countries.
- Germany recommends close cooperation with the [knowledge hub](#) of the BMZ funded global project TUMI E-Bus Mission. Germany recommends seeking regular exchanges on project activities for both normative and country-level work.
- Germany strongly recommends a high level of co-operation with BMZ co-funded [Get.Invest](#) project to maximise synergies around mobilizing investments in urban E-Mobility businesses.
- Germany supports a high level of integration between project activities on output 1.1 and the BMZ & EU co-funded project [Promoting Female Employment for Africa's Green Transformation \(WE4D\)](#). Germany recommends seeking regular exchanges on project activities for both normative and specifically on component 2 of GMFA.
- Germany recommends considering corruption risks across the project cycle as well as mitigation measures in the project risk section.
- Germany recommends including corruption risk assessments and the development of mitigating measures in the project designs at country level, giving local civil society stakeholders a role in planning and monitoring. Germany also recommends using transparent infrastructure data standards applicable to climate related infrastructure projects to reduce upcoming corruption risks.

✓ Switzerland Comments

- Will only 4 projects out of the 15 pipeline projects be supported by the GEF co-financing contribution (p. 15)?
- What are the options of the borrowers to mitigate the currency risk and how far will it endanger the deployment of blended capital?
- How secure are these co-financing sources, especially the USD 240 million from other lenders such as MDBs, IFIs, and the private sector? Will sufficient co-financing budget be available when the pipeline is developed, and project investments are ready? Has there been initial outreach already and what is the feedback to date?
- How could Paris Art. 6.2. transaction potential be integrated more strategically into the proposed program to enable countries to meet the conditional NDC target?

24. Rwanda. Rwanda Wildlife Conservation Bond (GEF ID 11514). Agency: The World Bank; GEF project financing: \$9,000,000; Co-financing: \$154,100,000.

✓ **Germany Comments**

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

- This proposal follows into the same footsteps then the 2021 Wildlife Conservation Bond, as well as the 2024 Coral Reef Bond. Given that the actual proceeds of the bonds issued are not related to the projects but serve general IBRD refinancing purposes, Germany maintains its view that it does not follow the rationale that this transaction mobilizes significant additional finance for biodiversity. Since this risk transfer involves paying a risk premium (i.e. the spread between investors foregone coupon payments and the success payment), we are not convinced that the transaction is economically efficient. In this scenario, bondholders might even receive a higher sum (USD 15 million conservation success payment) than the conservation measures (USD 9 million forgone coupon payments).
- Germany cautions to list the full USD 100 million bond as co-finance. The bond proceeds themselves will be used for the bank's general SDG purposes and not to achieve the conservation measures.
- Germany asks for clarification as to who the new investors are that the World Bank would like to attract, especially those who to date have not engaged with these types of financial instruments, and how these new investors will be targeted.
- Germany notes that the outcomes of the project components – the actual conservation activities – are very poorly explained. As the actual KPIs against which the conservation success payments are to be measured, are not yet developed/listed in the proposal, it is extremely difficult to assess the conservation contribution of this proposal.
- Germany would like to request clarification on the mechanism for determining the final KPIs that will trigger the conservation success payments.

✓ **Norway & Denmark Comments**

- The Wildlife Conservation Bond (WCB) offers a promising model for leveraging institutional investment in biodiversity and climate resilience. The risk of outcome achievement is transferred from government to investors and presents an interesting pilot that could set an important precedent for outcome bonds in other lower income countries.
- The WCB is further expected to promote economic diversification and inclusive job creation, especially for women and rural communities, through nature-based solutions and sustainable tourism, advancing both socio-economic and environmental goals, and help alleviate Rwanda's reliance on agriculture.
- By linking investor returns to the achievement of measurable environmental outcomes, such as biodiversity improvements and habitat restoration, the bond creates an attractive impact investment model that should enable Rwanda to attract private capital from both institutional investors and high net-worth individuals. Additionally, the potential for long-

term financial sustainability through eco-tourism and carbon credits should further enhance the WCBs appeal to investors.

25. Regional (Eastern Europe and Central Asia). Sustainable and Inclusive Green Acceleration Programme (GEF ID 11513). Agency: European Bank for Reconstruction and Development; GEF Project financing: \$13,761,469; Co-financing: \$253,808,341.

✓ **Germany Comments**

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

- While the programme's climate rationale is straightforward, Germany recommends including a more thorough analysis of the business-as-usual scenario. Certain information on the current GHG emission profile of the countries is provided, however, it is not well defined how the targeted sectors would develop in the absence of the programme. This could be aligned with an additional explanation of emission trajectories in the business-as-usual scenario.
- The proposal includes examples of typical investment categories. Project developers should ensure investment categories are thoroughly defined to exclude potentially harmful investments (e.g. unsustainable bioenergy installations leading to loss of biodiversity, food insecurity etc., energy efficiency installations in relation to fossil fuel use, energy efficiency installations in airports, ports etc., electricity networks with SF6 etc.).
- Germany asks to include a detailed analysis of the political landscape that governs incentive settings in the financial sector in each country to identify country-specific solutions as well as risk mitigation measures in case of political, institutional hurdles.
- While the envisioned impacts of the programme interventions are well described, the programme's exit strategy remains unclear. Germany requests to include a paragraph that addresses the programme's approach to ensure long-term effects beyond its lifetime.

✓ **Switzerland Comments**

- Component 1 (Technical Assistance) has GEF component of USD 1,400,000 million and a co-financing component of USD 162,931,000 million. The EBRD will provide USD 135,775,000 in co-financing, where would the remaining co-financing ca. USD 27 million come from? (p. 5,6 of Prodoc)
- Component 3 (Results-based finance) has a GEF component of USD 7,761,000 and a Co-financing of USD 74,290,000. Does the co-financing portion represent the results-based payments? How will the results-based payments pool be replenished once use up? It would be good to have a RBP continuation strategy.
- The Program states that when the results are not achieved the RBP need to be returned. What would happen to the underlying concessional loan, would it still qualify as climate finance?

- No of projects to be financed is not fully clear: Component 1 and 3: technical assistance and outcome-based payments will be deployed for 2,495 projects. Whereas under component 2 investments to unlock climate capital will reach only finance 557 projects. (p. 6,7 Prodoc). Will the remainder be financed by results-based finance?
- The Program refers to helping FIs set climate mitigation targets at institutional level (Prodoc, p. 15), it is not reflected in the KPIs.
- Synergies of this Program with the EBRD-GCF Greening the Financial System Program in the target countries of this Program could be better explained.
- The role of climate resilience as an objective from the beneficiary's point of view could be better presented and potentially some related KPIs introduced.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. This project is similar to the U.S. Agency for International Development (USAID) and Kyrgyz Republic's Green Solutions activity, which is a five-year, \$24 million project launched in October 2024. We encourage UNDP and EBRD to coordinate with the local USAID Economic Development Office to ensure that these programs complement each other.

MULTI-TRUST FUND PROJECTS

26. Yemen. Building Climate Resilience for Vulnerable Groups in Rural and Urban Areas of Yemen (GEF ID 11717). Agency: UNDP; Total Project Financing: \$19,883,486 (LDCF: \$18,098,624 and GEFTF: \$1,784,862); Co-financing: \$61,100,000.

✓ **Germany Comments**

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

- Germany welcomes that the private sector (smallholder farmers and MSMEs) is mentioned as a crucial partner in climate-sensitive sectors and that the project aims at providing direct adaptation benefits to the private sector.
- Germany suggests to further consult the private sector during project implementation phase and specify roles of different types of private actors, as these roles are not fully defined and the interaction between the private sector, local communities, and government bodies is not discussed.
- Germany suggests to clearly outline the differentiation between "gender sensitive" and "gender-responsive" and how and why they are differently used in the project proposal and further clearly outline, how mainstreaming gender can ensure that women and marginalized groups have equitable access to climate-resilient technology and training (see Outcome 3).
- Germany asks to give more details on stakeholders, especially when focusing on knowledge management as a key strategic tool, as it is neither mentioned who is responsible for setting up and managing knowledge systems, nor how lessons learned are communicated. Germany

also suggests to provide more information on suitable distribution channels that reach the vulnerable population.

- Germany welcomes the inclusion of the private sector (SME). However, a key difficulty in Yemen is the limited availability of suitable partner companies. How will this be addressed? Is the focus on SMEs or on MSMEs? Especially for SMEs which stability criteria are applied (for example, annual turnover, number of employees, positive net profit, etc.) and for MSMEs what are the eligibility criteria for the selected companies? How is a balance made between company stability (company key figures) and expected development effects, particularly regarding the effects on the target group in terms of (1) stabilization capacity, (2) adaptation capacity, (3) transformation capacity?
- Germany welcomes the provision of advanced technologies and capacity development of the private sector. However, how, and what kind of risk assessments will be carried out? How is a cost-benefit-risk assessment carried out? What mechanism will be used to review the past of private sector actors to exclude involvement in previous controversies or conflicts?
- Germany asks to assess the risks involved in the project implementation, particularly in the regions of Abyan, Shabwah and Hodeidah. A comprehensive security architecture is essential for a direct implementation in these regions and must be taken into account at an early stage of project planning.
- Germany requests information on the implementation of the planned activities on the ground. These are essential for a comprehensive assessment of the security implications.

✓ **Norway & Denmark Comments**

- It is not clearly stated from the brief description where in the country the project will be implemented. It should be taken into consideration that the UN has suspended all support to programs that are not directly life-saving or life-sustaining in the Houthi-controlled areas of Yemen, and that if the program is to take place in these areas, it is unlikely that it will be implemented during 2025.

✓ **United Kingdom Comments**

- We have some concerns around some of the governates the project will be taking place in. We should currently be following the UNSG decision to suspend development in the north/Houthi controlled areas following the detention of UN and INGO staff. Looking at the project some of the activities look to be development focused and proposed to take place in northern areas so we would have a concern with them progressing with those as it would go against the UNSG decision we're backing.

27. Samoa: Strengthening Climate Adaptation, Biodiversity Conservation, and Combating Land Degradation through Ecosystem-based Adaptation (GEF ID 11700); Agency: UNDP; GEF Project Financing: \$5,329,452 (SCCF-A: \$2,689,726; GEF TF: \$2,639,726); Co-financing: \$37,024,000.

✓ **Germany Comments**

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

- Germany welcomes the innovative approaches being named in the project proposal, such as establishing an Ecosystem Conservation Adaptation Trust Fund. Germany encourages the project team to evaluate the efficiency and longevity of new mechanisms like this one, and opportunities to engage other actors, such as from the private sector in the capitalization of the Trust Fund.
- While gender considerations and the goal of implementing gender inclusive measures is repeatedly named throughout the proposal, it remains elusive what kind of measures will be implemented. Thus, Germany recommends more detailed explanations of the specific measures and indicators being planned to achieve gender equality.
- Germany would welcome the inclusion of Indigenous Peoples and Local Communities and their knowledge more systematically throughout the project proposal and emphasizes the need for constant civil society participation across all project stages.

✓ **Japan Comments**

- “SDGs Business Verification Survey with the Private Sector for Environment Improvement and Reduction of Risks against Natural Disaster using the Bio-log Filter, Samoa” (October 2019-December 2024)” proposed by the Joint Venture of Nansei Environmental Laboratory Co., Ltd. and Wescot West Corporation was adopted and implemented in response to the FY2017 2nd Small and Medium-Sized Enterprises Overseas Development Support Project Public Announcement.
- Reference:
 - https://www2.jica.go.jp/ja/priv_sme_partner/document/955/F172064_summary.pdf
 - https://libopac.jica.go.jp/images/report/1000053293_01.pdf
 - https://libopac.jica.go.jp/images/report/1000053293_02.pdf
 - https://libopac.jica.go.jp/images/report/1000053293_03.pdf

28. Togo: Strengthening the resilience of natural and agro-ecosystems and communities to climate change in Central Togo (GEF ID 11548). Agency: UNDP; GEF Project financing: \$ 6,649,315 (LDCF: \$3,989,589; GEF TF: \$GET is \$2,659,726); Co-financing: \$68,523,913.

✓ **Germany Comments**

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

- Germany welcomes the planned expansion of the FLR measures beyond the prefecture of Tchamba to the prefectures of Tchaoudjo, Sotouboua, Blitta and Mo as part of the project evaluated here is a further step towards the dissemination of agroforestry approaches. The agroecological approach promotes diversification and at the same time ensures the economic participation of the local population through various value chains. The planned knowledge management ensures the adoption of best practices (including FLR).
- Germany welcomes the priority given to ensure food security through irrigation and mechanization. Several international partners are already involved in this area, such as France, Germany, the African Development Bank (AfDB) and the World Bank (WB) are implementing extensive programmes to build irrigation infrastructure, promote mechanization and train skilled workers. These ongoing projects are making a significant contribution to strengthening agricultural production and could be made even more effective through targeted coordination. Germany suggests to avoid duplication and use its resources strategically to close existing gaps and create synergies with the ongoing measures.

✓ **Japan Comments**

- Japan welcomes the work program, which realized almost equal formulation of projects in all 5 focal areas, while contributing to the implementation of different MEAs. We are, however, concerned that some projects with a large (almost 1:10) co-financing proposed by one country, such as ID 11548, 11693, and 11697, may have been inflated. We hope that this risk is taken into account in project designs, and recommend careful review to backcheck the proposed figures for co-financing as well as the value of the grants proposed.
- Furthermore, since some of the industry-related projects can be easily financed by risk-tolerant private capital, we need to consider additionality issues much more carefully. Considering the demarcation with the Non-Grant Instrument, those projects should be reviewed in order to ensure transparency and the regional balance.
- Regarding ID 11543: Life cycle management of plastics, the funds generated from private sector could be utilized to improve waste management, technological innovation, and/or product design. Further consideration should be given on the project based on data related to waste management. In general, we recommend considering whether it would be appropriate for countries with economic capacity as well as high levels of mismanaged plastic waste, to be eligible for GEF financing.
- We therefore request projects with these characteristics (ID 11543, 11548, 11693, 11697) to be subject to a second review by Council with more information before CEO endorsement.
- Furthermore, we suggest that these issues be taken into account in the next GEF 9 programming in relation to countries with sufficient access to global capital markets.

✓ **United Kingdom Comments**

- I find that the project contributes to the UK climate objectives this project is aligned with the Kunming-Montréal Global Biodiversity Framework target to which UK was is committed. I also appreciate the multi-stakeholder approach, and the private sector approach and the

community involvement and empowerment (especially of women). The project also tackle various type of barriers, from institutional level to the field level (communities).

Comments:

- Only 12 private sector companies will be supported, which I think is too few for this large project. I would also like to know if there is a target for supporting women-owned companies.
- I also understood that Togo is in a transition from a presidential to a parliamentary regime. Maybe this should be added in the risk register, with mitigation action for continued engagement with the government on improving the policy land management framework.
- And finally I can see that a lot of crucial aspects of the projects will need to be refined during the PPG, I hope that the budget (200K) will be sufficient to conduct of the PPG activities/studies.

SMALL GRANTS PROGRAMME

29. Global. Eighth Operational Phase of the GEF Small Grants Programme (GEF ID 11757); SGP CSO Challenge Program. Agency: IUCN; GEF project financing: \$9,075,229; Co-financing: \$ 4,500,000.

✓ **Germany Comments**

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

- Germany asks to include detailed information about the specific regions and countries involved, accompanied by formal government endorsements. Additionally, Germany requests that the proposal should clearly demonstrate alignment with the national priorities and provide comprehensive details on synergies with ongoing initiatives, ensuring coherence with existing development and environmental strategies.
- While there are some hints of an initial engagement with stakeholders during the PIF phase, Germany asks that the proposal should ensure that the CEO Endorsement letter includes a comprehensive stakeholder engagement plan, with explicit activities to engage with vulnerable groups such as youth, women, and Indigenous Peoples.
- Germany recommends to include SGP-specific indicators 12 and 13, together with their expected targets, to effectively track programme impacts on vulnerable groups such as women, youth, and Indigenous Peoples.

✓ **Switzerland Comments**

Recommendations

- Using existing or developing new mechanisms to operationalise complementarity and leverage synergies between relevant GEF-8 projects.

- Broadening the base of resources used for capacity building beyond IUCN's flagship resources.
- Not limiting high-impact events to fora already sensitised to the important work of CSOs but breaking out of this traditional "environmental silo" to reach new audiences.

Questions:

- Does a coordination mechanism among GEF-8 CSO related Programmes already exist?
- Are discussions on coordination among related projects underway?
- What are your plans to make effective use of synergies among CSO-related GEF-8 programmes?

30. Global. Eighth Operational Phase of the GEF Small Grants Programme (GEF ID 11726). Agency: UNDP; GEF project financing: \$65,420,307; Co-financing: \$65,420,307.

✓ **Germany Comments**

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

- Germany acknowledges the alignment of the project with GEF-8 strategies, particularly in enhancing coherence for integrated landscape-seascape governance. To strengthen this alignment, it is recommended to articulate specific mechanisms or policy dialogue processes that will ensure national-level policy coherence and effective integration of project outcomes into existing frameworks.
- Germany asks to include SGP-specific indicators 12 and 13 to effectively track the share of program beneficiaries among vulnerable groups, such as women, youth, and Indigenous Peoples.
- Germany suggests to incorporate the optional SGP-specific indicator 6 to reflect progress and targets related to the implementation of low-carbon technologies and other mitigation-oriented activities.
- Germany notes the references to stakeholder engagement, including the involvement of Civil Society Organizations (CSOs), Community-Based Organizations (CBOs), and private sector partners, as well as references to governance structures like National Steering Committees. However, to gain a clearer understanding, Germany asks for more detailed information, including a comprehensive list of consultations conducted, and recommend ensuring that the stakeholder engagement plan outlines these consultations and specifies future approaches.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project and appreciate the emphasis on sustainable development, tackling environmental and socioeconomic challenges, and capacity-building components for local institutions.

- We note the reliance on external funding and partnerships raises concerns about long-term sustainability and the program could place a stronger emphasis on strategies for self-reliance of local CSOs/CBOs. Additionally, since UNDP has yet to identify the project implementers, it is difficult to assess their capacity to implement program objectives. We would find it useful for the proposal to include more information on how UNDP will select the local CSOs and CBOs.
- The monitoring and evaluation framework is robust but could benefit from more specific indicators related to socio-economic impacts on local communities.
- The U.S. Agency for International Development (USAID) and Kyrgyz Republic's Green Solutions activity, which is a five-year, \$24 million project launched in October, overlaps with this GEF project. We encourage UNDP and EBRD to coordinate closely with the local USAID Economic Development Office to ensure that these programs complement each other.

31. Global. Eighth Operational Phase of the GEF Small Grants Programme (GEF ID 11698). Agency: FAO; GEF project financing \$17,500,554; Co-financing: \$ 17,500,554.00.

✓ **Germany Comments**

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

- Germany acknowledges the programme's alignment with the SGP 2.0 implementation guidelines by addressing local priorities and enhancing socio-ecological resilience through community-led solutions. However, to strengthen this alignment, Germany suggests to include further details on how the programme reflects on specific country and regional priorities, as well as key policies, at the country level in subsequent stages.
- The programme builds on the SGP to leverage on GEF resources to introduce blended financial instruments and technical assistance, facilitating community-led solutions that enhance socio-ecological resilience and contribute to Global Environmental Benefits (GEBs). To further strengthen the programme, Germany recommends to put a greater emphasis on the critical roles of CBOs and CSOs as key drivers of GEBs, highlighting their local knowledge, leadership in innovation, and capacity for community mobilization.
- Germany reminds the applicant of the SGP 2.0 priority on leveraging private sector and business-oriented approaches. In this regard, the proposal should further elaborate on private sector engagement and leverage strategies to ensure stronger alignment with SGP 2.0 objectives.
- Germany recommends to strengthen the alignment with the SGP 2.0 Operational Guidelines and Implementation Arrangements, particularly by detailing mechanisms and strategies to ensure the participation of women, youth, and Indigenous Peoples, along with the inclusion of required SGP-specific indicators (12 and 13).