



**Compilation of Comments Submitted by Council Members
on the GEF Trust Fund June 2025 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 June 2025 Work Program.

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**JUNE 2025 GEFTF WORK PROGRAM (REFERENCE: GEF/C.69/02):
COMMENTS FROM COUNCIL MEMBERS**

PROGRAMS

- 1. Global (Chile, India, Mexico, Peru, South Africa, Zambia) Global elimination of mercury in non-ferrous metals initiative – GEMINI (GEF ID 11892). Agency: UNIDO, UNDP, UNEP; GEF Project Financing: \$58,810,000; Co-financing: \$383,180,000.**

✓ **Germany Comments**

GERMANY REQUESTS FOR THE FOLLOWING PROJECT THAT THE SECRETARIAT SENDS DRAFT FINAL PROJECT DOCUMENTS FOR COUNCIL REVIEW FOUR WEEKS PRIOR TO CEO ENDORSEMENT:

- The project barrier discussion as well as the Theory of Change (ToC) appear to be well considered and robust. However, at the Output level the proposal lacks precision and remains overly narrative. Germany requests that the project proponents provide clear activities and their expected achievements under each Output.
- Output 1.1 defines assumptions, which, if unmet, put the project success at risk. E.g. Output 1.1 *“Also, government agencies in each Child Project must ensure that regulatory conditions exist to ensure companies follow mercury emission limits by conducting inspections and audits and enforcing penalties for non-compliance, which deter violations and encourage industries to invest in mercury-free technologies.”* (page 33). Germany considers the non-fulfilment of this assumption would be a reason to terminate engagement and should be checked at project start in close coordination with the respective governments. Otherwise, the project proponent shall outline a monitoring strategy for commitment of the partner countries as well as elaborate its exit strategy in case of non-performance.
- For Output 1.2 it is intended to undertake multistakeholder coordination, which shall lead to *“Enhanced legal/operational/technical frameworks to control and monitor Hg emissions and releases/byproducts”*. However, the attribution gap to trigger the expected change is very long. Germany requests that the project proponent shall reconsider and elaborate in more detail which achievements can realistically be met within the given time and resources of the project. In this context, a clearer description of the envisaged interventions and contributions of the project and the output is needed. The role of the stakeholders is clearly outlined but it remains unclear what tangible actions the project will take, beyond coordination and communication, to help stakeholders in fulfilling their roles. This output also appears to overlap significantly with Component 4.
- Germany considers Output 3.1 to be highly ambitious. Germany requests that the project proponent confirms whether the GEMINI program, through its child projects, will develop the inventories for all partner countries. Furthermore, the project proponent is requested to further clarify the basic requirements or assumptions to establish such inventory successfully.

- Output 3.3 suggests conducting demonstration studies to introduce BAT/BEP. The original BAT/BREF process derives from the European Sevilla Process and is designed to agree upon what constitutes the Best Available Techniques (BAT) for pollution prevention and control. It is a multi-stakeholder consultation process. Germany requests the project proponent to consider a stakeholder dialogue within Output 3.3 to ensure that introduction of BAT/BEP technology is technically and financially feasible in the partner countries.
- Germany remarks that the project should take into account certification standards like the currently most ambitious certification standard in the raw materials sector, IRMA - Initiative for Responsible Mining Assurance, that includes a chapter on "Mercury Management" and sets a high standard for the mining sector (https://responsiblemining.net/wp-content/uploads/2018/08/Chapter_4.8_Mercury.pdf)
- Regarding the chapter "Coordination and cooperation with Ongoing Initiatives and Programs" (page 47), Germany recommends considering the Andean Community (Comunidad Andina, CAN), which has been working on the organization of a "mercury observatory".

✓ **United States Comments**

- We appreciate the project's emphasis on the private sector and on building broad support for the project. We support the project's focus on innovative financing and encourage emphasizing private sector investment to fund mercury-free technology.

2. Global (Brazil, Colombia, Madagascar, Nigeria, South Africa, Tanzania, and Türkiye). (GEF ID 11901). SGP Microfinance Initiative for Locally Led Action. Agency: The World Bank; GEF program financing: \$9,174,312; Co-financing: \$1,487,000,000.

✓ **Germany Comments**

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

- Germany acknowledges the substantial co-financing committed to the initiative, with the GEF contribution of USD 10 million expected to leverage approximately USD 1.487 billion from national programs. Germany recommends further clarification of the share of this co-financing that will be directly dedicated to microfinance interventions as opposed to other activities.
- Germany recommends that the proposal elaborates on concrete sustainability mechanisms specific to the microfinance interventions and an exit strategy. This could include planned partnerships for continued technical assistance or refinancing options for MFIs.
- Germany notes that a review of the regulatory landscape is planned during implementation. However, it is recommended to clarify how national financial regulatory frameworks and supervisory institutions will be involved in the design and implementation of the program.

✓ **United Kingdom Comments**

- For the Global Microfinance Initiative for Locally Led Action project, ensuring project ownership of the central bank is essential given that microfinance institutions' rates are

subject to the central bank's interest rates, which increased recently. Lessons from previous projects showed that higher rates exacerbated community borrowers' insolvency.

STAND-ALONE FULL-SIZED PROJECTS

BIODIVERSITY

3. Indonesia. Spatial-based Natural Forest Planning and Governance for Robust Ecosystems (SPARE) – (GEF ID 11714). Agency: UNDP; GEF Project Financing: \$6,192,695; Co-financing: \$40,000,000.

✓ Germany Comments

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

- Germany recommends coordination with the GIZ-projects FORCLIME and ProPeat which are involved in the National Forest Plans (RKTN) revision as well as the development of financial and incentive mechanisms. GIZ ProPeat operates in North Kalimantan on sustainable peat management and related planning documents.
- Germany does not see the described synchronization issues between the RKTN, RKTP, RPHJP and national or provincial development plans addressed in Output 1.1. The process for the development of these plans is already harmonized. Multistakeholder and cross sectoral dialogues are already part of the development of these plans. Germany recommends coordination with GIZ FORCLIME as it is advising MoF on RKTN (2011-2030) second revision.
- Germany suggests reconsidering the added value of including natural capital assessments in the existing GIS tool, as there is a risk of overloading the team in the Inventory and Monitoring of Forest Resources Directorate (IPSDH) and the digital system that focuses on forest monitoring. An additional layer of data is of very limited use if there is no legal basis or enforcement (see HCV areas).
- Germany recommends to not increase complexity of existing processes regarding forest planning and believes that there is no shortage of plans but a shortage of implementation and budget. The FOLU Net Sink Operational Plan, addressed in Output 1.3 is already sufficiently complex and does not require another parameter.
- Germany sees a high risk to focus on MRM plans as they lack a clear legal basis. There is no guarantee that the government will adopt or fund and support these plans or even integrate them into the RKTN. This risk is highlighted on page 35, but we would rather categorize it as "high risk" because the government is currently experiencing severe budget cuts. The non-adoption/funding of these plans would jeopardize Outcomes 2, 3, and 4. Therefore, Germany asks to focus more on the implementation of existing plans (with a legal basis) rather than the formulation of new plans.
- Germany appreciates the approach (Output 1.4) to strengthen cross sectoral and cross agency collaboration. Regarding capacity building, collaborative strategies and other MRM-

related activities described in Output 2.3 and 3.1-3.3, Germany suggests improving alignment with the responsibilities and established processes of forest authorities, such as the government-led Integrated Area Development (IAD) concept for social forestry and upstream and downstream economic development.

- Germany recommends prioritizing the implementation of the National Forest Inventory (NFI) over the assessment of natural capital. The implementation of the NFI is dealing with severe funding gaps. At the same time, updated NFI data is a prerequisite for any sound natural capital assessment (or even SEEA). In addition, the RKTN (to be supported under Outcome 1) also draws on the NFI. Since there is no legal basis for the assessment of natural capital in Indonesia, there is a risk that the activities described under Output 2.1 would only add another layer of information that the government might not ultimately take into account.
- Germany proposes to integrate strengthening land tenure, which is the basis of CPLC's well-being and livelihoods (Outcome 4). Land tenure is often weak and conflicts with other stakeholders exist. These need to be identified and resolved. A sole focus on promoting forest-based businesses without considering the legal land use and tenure will not be sufficient.
- Germany recommends reflecting the important role of the Environmental Fund Management Agency (BPD LH) and explicitly target improvements in resource management and mobilization systems, focusing on increased transparency and a review of intermediary institutions (LEMTARA). Germany proposes to emphasize greater involvement of local NGOs and community-based organizations, as well as local university-based economic and community empowerment centers.
- Component 2 of the project has a significant risk for corrupt practices due to its involvement in land-based investments, customary and community forest management, and the allocation of funding for pilot projects. Germany therefore recommends establishing robust, transparent mechanisms for selecting and monitoring forest management units and beneficiaries, to include independent third-party verification, and to implement real-time disclosure of funding flows. Germany also recommends grievance redress mechanisms accessible to local communities and anti-corruption training to further reinforce integrity and accountability.

✓ **Norway & Denmark Comments**

- The proposed project is relevant, strategic and worthy of support. If successful, it will strengthen the policy instruments of focus and their modalities for implementation.
- It could have been even more strategic if more forested and biodiversity-rich provinces were selected for intervention, such as provinces in Papua.
- It is a good idea to integrate the Natural Capital assessment into spatial forestry planning process, and it is even better if this is to be included as a legal norm for the national and sub national level.

- The proposal uses the term “spatial data” without specifying what kind of spatial data and information it is referring to.
- While proposed interventions are relevant and important, some of the examples/references cited as justification for the interventions seem to be crafted to support the argument and the relevance of the activities, while other (and more recent) references could convey a different picture.
- In Indonesia, there is a need for improved MER (monitoring, evaluation, and reporting) of the FOLU Net Sink. Component 1, Outcome 1 and 2, is well suited for MER purpose for the FOLU Net Sink 2030 targets, and it would be good to configure it so it can also be used for that purpose. Such a configuration would include targeting provinces that are implementing FOLU Net Sink activities.
- It would be best to focus Component 2 efforts to a specific ministry that has the authority to implement forest & ecosystem management, restoration, and monitoring.

4. Indonesia. Excelling Protected Area Management Effectiveness for Biodiversity Conservation through Landscape Based Approach (ENABLE) – (GEF ID 11861). Agency: UNDP. GEF Project Financing: \$6,649,315; Co-financing: \$48,000,000.

✓ **Germany Comments**

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

- Germany (Federal Ministry of Economic Cooperation and Development, BMZ) has a longstanding cooperation on protected areas with the Indonesian Government. Currently 29 Protected Areas are supported via KfW, GIZ and Legacy Landscapes Fund (LLF). LLF funds the WCS activities in Gunung Leuser NP. BMZ also supports the selected Protected Areas Kerinci Seblat National Park and Bukit Barisan Selatan National Park. We highly recommend exploring synergies between the GEF proposal and GIZ and KfW projects on Protected Areas in Indonesia.
- Germany welcomes the approach of community involvement and the strengthening of civil society organization. We therefore suggest that this engagement could be anchored in an indicator as well.
- Germany welcomes the aim to achieve financial sustainability for the three Centers of Excellence and the knowledge management platforms by elaborating a financial sustainability plan and implementing it within the given timeframe. We suggest integrating further concrete activities related to sustainable economic models, e.g. income-generating activities, to which a reference could be found in the proposal, but no activity or indicator was developed. This could draw a link to the 2000 people who should directly benefit from this project.
- Germany encourages to continue the Indonesian process of engaging with the IUCN Green list, especially in the selected protected areas.

- Germany welcomes the envisioned use of digital tools such as e-learnings, data sharing and knowledge platforms. We suggest using already existing platforms, e.g. the Indonesian Clearing House Mechanism, the ASEAN biodiversity dashboard, including its best practise section, and the PANORAMA solutions platform.
- Regarding the private sector involvement to implement the landscape-based approach, Germany sees it as crucial that the project evaluates during the PPG stage how the project can ensure that partners from the private sector, who are concession holders, implement High Conservation Value area management.
- So far conservation partnership models with communities in various protected areas have not been effectively implemented. Germany would like to understand how the project envisions advancing social forestry through the conservation partnership scheme with government support and commitment.
- Many threats to the PCA, mentioned in the proposal, cannot be addressed by the Ministry of Forests alone. Germany therefore suggests integrating other ministries, especially those related to energy/mining, economy and agriculture.

CHEMICALS AND WASTE

5. **Regional (Burkina Faso, Comoros, Cote d'Ivoire, Ethiopia, Guinea, Madagascar, Mauritania, Niger, Nigeria, Sierra Leone, South Africa, Togo, Uganda). Elimination of Mercury-Added Skin Lightening Products (SLPs) in Africa (GEF ID: 11877). Agency: UNEP; GEF Project financing: \$15,000,000; Co-financing: \$76,626,454.**

✓ **Germany Comments**

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

- Germany suggests to more explicitly consider linkages between Component 2 and Component 3, for instance, applying learnings from behavioural studies and supply chain maps to inform enforcement and consumer safety controls.
- Regarding the chapter on “Coordination and Cooperation with Ongoing Initiatives and Project” (p.23), Germany recommends to include existing platforms on African beauty such as the Forum International Afrique Beauté (FIAB), which brings together professionals from the sector (researchers, service providers, entrepreneurs) who could not only reinforce the message but also promote alternative options using local biological resources.

✓ **Switzerland Comments**

General comments:

- We welcome this project; it is a good example of how the GEF supports countries in eliminating environmental pollutant in a comprehensive and innovative way with interventions along the supply chain so combining up-, mid and downstream measures. –

the project illustrates well how the GEF could support countries implement the obligations of a future Plastics treaty.

- The fact that project builds on MSP is also very encouraging, however the scaling up to a large number of different countries bears risks that will have to be managed carefully.

✓ **United Kingdom Comments**

Uganda:

- The initiative is timely and crucial for Uganda and the broader Sub-Saharan African region
- **From a policy perspective:** This project aims to eliminate mercury in skin lightening products through strengthening regulations, raising public awareness, and promoting safer alternatives. This is timely given the rate of “bleaching” in this country. Uganda faces rising use of toxic skin lightening products despite the existing bans, highlighting a need for stronger enforcement, legal alignment, public awareness to protect health.
- **Cultural and social dynamics:** Skin lightening practices in Uganda cut across educational and socioeconomic backgrounds. Both educated e.g. public figures like the Speaker of Parliament of Uganda. These are supposed to be role models for women in Uganda. This underlines the deep-rooted cultural perceptions that associate light skin with beauty and social status. Therefore, addressing this issue will require more than regulation but a cultural shift in beauty standards.
- **Enforcement Challenges:** Since 2016, Uganda banned mercury-related skin lightening products, however enforcement remains a challenge. Illegal products continue to enter the market through porous borders, often smuggled in small quantities to evade detection. The Uganda Revenue Authority (URA) has intensified crackdowns on such smuggling activities, but this has not stopped these products, meaning that there is a need for more robust enforcement mechanisms.
The proposal suggests tackling the problem at a regional level by promoting regional policy harmonization will ensure consistency across borders. Perhaps this will help crack down on those smuggling in the products.
- **Political Risk:** The GEF Initiative proposes good alternatives e.g. safe cosmetic alternatives and within it, behavioural campaigns. Perhaps caution on the awareness campaigns and how these are designed mindful of high-profile people that bleach and could influence regulatory reforms e.g. in Parliament.
- **Gaps:** Not clear at this stage how much Uganda will receive. Hopefully there is enough to position the country as a regional leader/model given the existing bans on such products. Tracking online market in Uganda – online monitoring is a regional activity, but Uganda’s role is not singled out. Scaling up Uganda led biomonitoring is mentioned but not which country will lead or be a priority.
- **Opportunity:** The proposal mentions awareness and prevention, public health messaging with health risks highlighted and the role of health professionals but there is no provision for medical care, dermatological treatment or psychosocial support for individuals already

harmed by SLPs. This is a missed opportunity considering the long-term damage of these products, including skin cancer. Is this something to consider or pilot at the PPG stage?

6. Regional (Azerbaijan, Kazakhstan, Ukraine, Uzbekistan). Supporting the Ratification and Phase-Down of Hydrofluorocarbons in Production: A Regional Initiative for Enhanced Action in Central Asia and Eastern Europe (GEF ID 11881). Agency: UNIDO; GEF Project Financing: \$ 6,375,343; Co-financing: \$ 50,000,000.

✓ **Germany Comments**

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

- The project aims to support and accelerate the implementation of the Kigali Amendment in the participating countries but should be more ambitious regarding the type of technology to bring forward in the technology transformation. Germany requests considering not only ozone and climate impact of refrigerants, but also environmental and health impact such as following PFAS and TFA emissions. The project objective would thereby also align with the targets of the Paris Agreement and the SDGs.
- In consequence, Germany believes that the proposed project should not fund any market-established and standardized low-GWP HFC/HFO refrigerants that have negative environmental impact and come with negative health impact (PFAS/TFA). It is suggested that the proposed project focusses on ultra-low GWP PFAS free refrigerants, e.g. natural refrigerants. In particular, this concerns the following outputs/activities:
 - Output 2.2. Piloting of HFC phase-down: All pilots should focus on ultra-low GWP refrigerants only and that do not contain PFAS or break down to TFA. It is not additional or ambitious to fund low-GWP HFC/HFO technologies. The F-Gas industry is introducing these substances anyway and does not require additional funding from GEF. The refrigerants must be specified throughout the text, just referring to low GWP technologies is not sufficient. (e.g. change “conversion to low-GWP technologies to conversion to ultra-low GWP natural PFAS free technologies).
 - Output 3.2 and 3.3.: Capacity building and awareness raising program: Should not focus on established HFC/HFO substances but focus on substances enabling long-term sustainable development in alignment with targets of Montreal Protocol, Paris Agreement and Agenda 2030, not yet established on the market. True innovation must include real innovation and therefore not finance established standard low-GWP HFCs/HFOs. Also training activities should focus on non HFC/HFOs.
- Germany asks to include more details on the destruction of HFCs in the proposal. It includes pertinent outputs on the technical aspects of the destruction of existing HFC stocks, however, lacks details on the strategic approach and on how this will be implemented in the different countries.
- Germany recommends to also include support for developing HFC banks inventory and management plan in the Component 1 activities during PPG or inception (e.g. in Output 1.1.

Baseline assessments of HFC consumption and use HFC and low-GWP alternatives in key sectors).

- Additionally, Germany recommends aligning the MRV of the destroyed substances of the project with both the Montreal Protocol and the UNFCCC reporting in each country, assuring that the national GHG inventories are always kept up to date.
- While the piloting activities in Output 2.2. are vital to demonstrate feasibility of HFC phase-down in local context, the project proposal lacks strategies for scale-up of the technical demonstrators and pilot projects. Germany asks to include these strategies in the proposal.
- Specifically, regarding the country component for Ukraine, the contribution of the project towards implementation of EU regulations could be laid out more clearly (for instance EU Regulation # 2024/573 on fluorinated greenhouse gases and its implementing acts and also, if possible, EU Regulation # 2024/590 on substances that deplete the ozone layer and its implementing acts).

✓ **Switzerland Comments**

General comments:

- We welcome the project with three countries of our constituency.
- The project is very relevant to the situation in the beneficiary countries. It is well designed using a proven approach and following best practice. It is based on the Kigali Amendment and is expected to contribute to the reduction of climate gas emissions.

Questions:

- The implementation and enforcement of the developed industrial policy should be periodically evaluated.
- To verify the real impact/amount of HCFs and Greenhouse gas reduction, a stringent and well-designed monitoring system must be in place and operated.
- The quality of the established National Testing Laboratories should be assured and be evaluated with at least one international organised round robin test.
- The amount of co-financing through the private sector and the in-kind contributions have to be transparently documented, monitored and verified by the implementing agency.

✓ **United States Comments**

- The PIF should ensure that convention obligations are accurately characterized. For example, in the Prevention of illegal trade section (pg. 11), the project notes countries are 'encouraged' instead of 'required' to establish licensing systems to regulate the import and export of HFCs. This language should be adjusted to accurately reflect convention obligations that require countries to establish licensing systems (Article 4B as amended).
- Given that GEF funding should be efficiently directed towards meeting convention obligations, we hope these projects will ensure these countries' compliance with their

obligations since one of them is still working toward compliance with HCFC obligations and this country was in noncompliance even with GEF support.

CLIMATE CHANGE

7. **Global. Climate Transparency Global Support Programme III (Climate Transparency-GSP III) (GEF ID 11880). Agencies: UNDP and UNEP; GEF project financing: \$9,000,000; Co-financing: \$ 1,100,000.**

No comments received.

8. **Burundi. Rural Electrification for Community Well-being in Burundi (GEF ID 11888). Agency: UNDP; GEF Project Financing: \$ 4,863,699; Co-financing: \$23,300,000.**

✓ **Germany Comments**

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

- Germany recommends including corruption risk assessments and the development of mitigating measures in the project designs at country level.
- Germany suggests to further elaborate the Future Energy Scenarios, explaining in detail which actor developed and evaluated these scenarios and identified the preferred scenario, making reference to country ownership, and what the project does specifically to contribute to the preferred scenario.
- Germany would like the full project proposal to elaborate in more detail how high levels of buy-in and ownership at all levels will be ensured during project development and implementation.
- Germany also supports the requests made in the review sheet by the Secretariat regarding integrating gender considerations in the full project proposal.

✓ **Switzerland Comments**

General comments:

- The PIF provides a strong rationale for the scaling up of commercial investments in renewable solar PV minigrids in Burundi with a total of 6,500 households connected to 4 solar PV minigrids with approximately 80,000 tons of CO₂e avoided over the next 20 years. 38,740 people are expected to benefit from GEF-financed investments.
- However, the PIF does not address land use degradation (one of the sources of funding) and has weaknesses in providing economic information and stakeholder engagement. These shortcomings are identified in the PIF though and are expected to be addressed as part of the elaboration of the project proposal.

Question:

- In the list of indicative co-financing (p. 37) the PIF mentions indicative co-financing from the private sector of \$ 13,650,000, an amount reflecting the strong interest of the private sector

in this project. Kaze Green Economy and its partners is listed as a Co-financier. Who are those partners? Are there potential conflicts of interests? Are these companies from Burundi? Are international companies involved? And what expectations do the companies have in terms of project involvement.

INTERNATIONAL WATERS

9. Regional (Argentina, Brazil, Uruguay). Foster Transboundary Cooperation and Capacities for the Management of the Marine Biodiversity of the Southwest Atlantic Large Marine Ecosystems through Regional and National Actions (GEF ID 11476). Agency: CAF; GEF Project Financing: \$9,100,000; Co-financing: \$111,600,000.

✓ Germany Comments

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

- Germany encourages a more detailed approach to the direct inclusion and active participation of Indigenous Peoples and local communities (IP&LCs). It is not clear how and to what extent IP&LCs will be included in the project implementation stage. A concrete mechanism should be established to ensure that project planning and implementation are conducted with free, prior and informed consent (FPIC). In addition to MPAs and OECMs, instruments such as Indigenous and Community Conserved Areas (ICCAs) and Locally Managed Marine Areas (LMMAs) can be considered.
- Germany welcomes that the project proposal recognizes the importance of engaging with the private sector (esp. fishing and energy), but it does not describe how engagement will take place during project implementation. We suggest that this aspect be further clarified going forward.
- In Brazil, the Ministry of Environment (MMA), the Interministerial Committee for Marine Resources (CIRM) and the Ministry of Fisheries and Aquaculture (MPA) were consulted for the PIF. We recommend involving following stakeholders during the PPG and project implementation, as they are key stakeholders and/or coordinate relevant national programs/initiatives: Ministry of Science, Technology and Innovation (MCTI, coordinates programs on ocean science, research and culture, and is developing a National Strategy for the Blue Economy), National Institute for Ocean Research (INPO), Ministry of Integration and Regional Development (MIDR, coordinates the program Amazonia Azul which seeks to promote the blue economy), coastal IPLC organizations (esp. for traditional fisheries) such as CONFREM, CPP and MPP, women's organizations and networks such as the League of Women for the Ocean (Liga das Mulheres pelo Oceano).
- Regarding Component 4, Germany suggests considering the Brazilian National Strategy for the Blue Economy based on science, technology, and innovation, which is being developed under the leadership of the Ministry of Science, Technology and Innovation (MCTI) within the framework of the 11th Sectoral Plan for Marine Resources (2024–2027).

- Invasive species are mentioned as a key driver of degradation, but the issue is not addressed by the project (at least not explicitly). Germany suggests that this could be included in Outcome 3.1 / Outputs 3.1.3 and 3.1.4 (for instance, developing a joint monitoring protocol, early identification mechanisms, coordination of measures amongst countries to control invasive species) or in Output 2.2.1 (as one of the issues covered by the permanent information exchange and coordination mechanism).
- Germany welcomes the idea of establishing an Information Exchange and Coordination Mechanism. As part of Output 2.2.1 (or the PPG), perhaps an exchange with the CPPS could be useful, to learn from their experience in coordinating joint scientific action and coordination of member countries (Chile, Ecuador, Peru, Colombia) regarding marine conservation and (disaster) risk management.

10. Regional (Philippines, Indonesia, Malaysia). Sulu-Sulawesi Seascape Approach to Coral Reef Livelihoods (SEACONNECT) (GEF ID 11528). Agency: CI; GEF Project Financing: \$6,000,000; Co-financing: \$49,240,400.

✓ **Germany Comments**

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

- Germany emphasizes that environmental, social, and economic sustainability must be pursued in an integrated manner and appreciates the project's ambition to do so. However, the proposal and its activities would benefit from a clearer articulation of which specific problems are being tackled by which interventions. As it stands, the scope remains broad and somewhat diffuse.
- Germany values the adoption of a co-design approach to ensure a sustainable and inclusive project framework. We encourage recognition that co-design is an ongoing process rather than a one-time effort. This principle should be embedded throughout both the design and implementation phases.
- Germany further welcomes the project's commitment to strengthening inclusive and gender-responsive management of coral reefs, fisheries, and related coastal resources. We recommend reinforcing this component within the overall project design. At present, the gender-related challenges in the region are not clearly identified, nor is it evident how the project intends to address them. We suggest applying rights-based and gender-responsive or -transformative approaches throughout the project's logic. It is not sufficient to aim for participation quotas in workshops or trainings; rather, the capacities of women, Indigenous Peoples, and other marginalised groups must be strengthened to ensure their meaningful engagement in all relevant processes.

✓ **United Kingdom Comments**

- Aligns with blue economy priority of government in the Philippines (Blue Economy Bill at final stages of drafting in legislature).
- This could be aligned with ongoing bilateral initiatives on the blue economy, including on marine spatial planning and blue carbon.

- **Question:** IUU fishing / illegal fishing and poaching practices threaten reef conservation. How will the project incorporate tackling IUU fishing? This is important in the Sulu Sea region of Mindanao, given the transboundary nature of the area and prevalence of these practices.

Indonesia

- From the project document, UK post in Indonesia cannot find any smoking guns that prohibit them from supporting the initiative. In fact, post is happy to learn that CTI-CFF has secured this funding. The project will sit nicely with other UK bilateral programmes – in particular COAST (Climate & Ocean Adaptation and Sustainable Transition) – an FCDO-led BPF programme. Post is keen to have more coordination with them for their programming as well.
- Secondly, as Coral Triangle Region is facing / forecasted to collapse as soon as in another 5 years (findings from the Joint Intelligence Cell), post will take everything on the table to avoid the collapse from happening. Again, post strongly supports this initiative.

✓ **United States Comments**

- The U.S. Tropical Forest and Coral Conservation Act program will overlap with some of the geographies covered in this project. We recommend the project implementors ensure coordinating with other relevant projects in the area.

11. Regional (Central African Republic, Democratic Republic of Congo). Regional program for integrated water resources management in the transboundary basin of the Ubangi River between the Central African Republic (CAR) and the Democratic Republic of Congo (DRC) (GEF ID11906). Agencies: AfDB, IUCN. GEF Project Financing: \$ 8,000,000; Co-financing: \$ 67,357,500.

✓ **Germany Comments**

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

- Germany suggests placing the proposal more within context of global and regional frameworks on transboundary water management. It is important that activities that are planned for one basin are closely aligned with regional priorities and global development objectives.
- Therefore, Germany recommends setting the proposal within the context of global frameworks such as the Agenda 2030 and the African Union Agenda 2063. Furthermore, global frameworks, especially on transboundary water management, such as the 1992 Convention on the Protection and Use of Transboundary Watercourses and International Lakes ('the Water Convention') should be referenced, and the contribution of the proposals to it could be highlighted. For the Water Convention, the DRC is in advanced stages of joining as a signatory party, while there are initial talks with the CAR of joining the Convention.

- Germany asks to reflect regional frameworks around transboundary water management and place the envisioned activities within their context. Of special importance here is the SADC Protocol on Shared Water Resources.
- Germany recommends to further highlight alignment and potential synergies of the proposal and its planned implementation activities with the engagement of other donors in the region. The manifold activities by the EU and EU member states under the framework of the Team Europe Initiative on Transboundary Water Management in Africa are especially relevant.

✓ **Switzerland Comments**

General comments:

- The project is well conceived and explained, it is embedded in the context and strategically aligned with both national and regional priorities.
- It addresses critical environmental, social, and economic challenges in the River Basin through integrated, inclusive, and adaptive way.
- It is expected to improve the livelihood of potentially an estimated 25 million people, to strengthen regional cooperation, to improve water security, and to enhance climate resilience.
- However, long-term sustainability is questionable and depends strongly on renewed / continued political commitment, strengthened institutional capacities, local/national ownership, and domestic financing.
- At this stage there is no exit-strategy and hence e.g. no plan nor roadmap showing how national budgets could gradually take over project-related costs.
- Further, the project does not look into any other financing models, e.g. such as sustainability funds, tariff-based revenue models, or other concrete mechanisms to guarantee any funding beyond the donor lifecycle.

Questions:

- CAR and DRC governments provide sustained/reinforced political commitment and commit to domestic financing to maintain project outcomes beyond donor support?
- Can CICOS and national institutions effectively build, retain, and operationalize the technical and governance capacities needed for transboundary water management?
- Will local communities - especially women and youth - be meaningfully engaged and empowered to ensure inclusive, long-term ownership of interventions?

MULTI-FOCAL AREA PROJECTS

12. Philippines. Greening of the Philippines cement and construction industry (GEF ID 11707). Agency: UNIDO; GEF Project Financing: \$ 6,192,694; Co-financing: \$ 43,795,000.

✓ Germany Comments

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

- Germany suggests strengthening the connections between outputs, for instance output 1.1.4 "Traceability and monitoring of materials used in the construction sector" is a crucial input for output 1.1.1 (policy review) but not labelled as such.
- Germany values the emphasis on green public procurement and recommends further enhancement by piloting actual GPP tenders or procurement processes, possibly in connection with Component 3.
- Germany recommends establishing decision-making mechanisms to ensure that the least GHG-emitting technology available is applied in all activities to prevent future carbon lock-ins.
- Germany suggests refraining from assessing the ambition level of the Philippine's NDC as there is no internationally defined measure for it. For example, some assessment tools, such as the Climate Action Tracker, consider the Philippine's unconditional NDC as insufficient (see: [Targets | Climate Action Tracker](#)), which is in contrast to the assessment presented in the project proposal.
- Germany suggests to include an estimate of the indirect CO2 mitigated and the energy saved through the project, or an explanation as to why these indicators cannot be applied in this case.
- Germany notes the lack of specific activities to support the achievement of the 2021 Policies and Measures (PAM) of the Philippines' Nationally Determined Contributions (NDC), for instance indicators or activities that would support the achievement of the PAM on waste heat recovery (WHR) could be considered to enrich the breadth of the proposal.
- Germany asks if the participation of the Asian Infrastructure and Investment Bank in the project's stakeholder engagement was considered. If yes, we ask to explain why they have not been considered as potential stakeholders.
- The proposal could also include support to the PH Gov. in further increasing ambition on cement-related PAMs in the NDC 4.0 and potentially support the MRV requirements on cement.
- Given the special corruption risks in the cement and construction sector, Germany recommends including corruption risk assessments and the development of mitigating measures in the project design. Germany also recommends including anti-corruption in the project's capacity building program, using transparent data standards to reduce upcoming corruption risks and considering synergies with infrastructure and procurement related transparency initiatives such as Open Contracting Initiative and Infrastructure Transparency

Initiative CoST that have developed data standards applicable to climate related infrastructure projects.

✓ **Japan Comments**

- Ministry of the Environment of Japan has provided support to the Government of the Philippines in order to develop a material flow of mercury for over 3 years.
- The emission data from the cement and construction industry was identified with the support of GEF, and the 11707 project would be helpful for the Government of the Philippines to further improve their material flow.

✓ **United Kingdom Comments**

- Aligns well with Philippine NDC, which covers Industrial Processes and Products Used. So there's a political anchor. UNDP is sector lead for this element of the NDC among international partners.
- Also aligns with Philippine Energy Plan which has a priority pillar on energy efficiency and conservation measures.
- **Question:** UNIDO is the proposed implementing agency. UNIDO has £65m in funding from DESNZ for its Accelerate to Demonstrate Facility (running to March 2029) which includes running pilot projects on industrial decarbonisation. How will this project align with A2D?

NON-GRANT INSTRUMENT

13. Commonwealth of Dominica. Dominica Geothermal Risk Mitigation II Project: Additional Financing and Guarantee (GEF ID: 11865). Agency: World Bank; GEF Project financing: \$11,422,215 (NGI: \$5,479,452, STAR: \$5,942,763); Co-financing: \$112,450,000.

✓ **Germany Comments**

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

- Germany asks to clarify whether the new gas insulated switchgear (GIS) substations will contain the extremely powerful greenhouse gas sulphur hexafluoride (SF6) as insulating gas or whether it will contain one of the more climate-friendly alternatives and give a reasoning for the chosen option.
- Germany asks to include the projected gCO2e/kWh of the geothermal energy plant.
- Germany recommends, as also stated by the Secretariat, that the project proposal should integrate gender considerations throughout the programme's outcomes and outputs, not only in component 2.2. In addition to that, indicators should be formulated as to how many people will be trained under each component in total and disaggregated by gender, as currently it is only stated that ten women will be trained.

✓ **United Kingdom Comments**

- This is a project UK post in Dominica strongly supports.

- Under DGRM I, financing supported drilling of the production and reinjection wells that facilitated negotiation of the agreement to construct the geothermal plant.
- The plant and transmission line projects are proceeding well and failure to provide the shortfall in funding and the guarantee would negatively impact completion of this project which has transformational development potential for Dominica.
- The cost for transmission lines is significant due to the topography and mix of above and below ground (for climate resilience) installation required to evacuate the power from the plant to Roseau. As indicated the guarantee is needed as a condition of the PPA, WB approached us for support, but our current budget did not allow it. DOMLEC needs a payment security guarantee in form of a letter of credit for at least 6 months of electricity generation, but regional commercial banks were not in a position to provide such a guarantee, which needs to be in place before commissioning of the plant which is set for January 2026. Posts understanding is that this is to cover the company so that if there are delays in the connection of the plant to the grid after its completion their cost would be covered for the period. Post gathers the guarantee will be converted to a loan in this case. If all goes well and the company can be paid from customer connections on commissioning, the guarantee would not be needed.
- Successful completion of this project would make Dominica the 1st English speaking Caribbean Island to have geothermal power and brings them a step closer to achieving their vision as “the first climate resilient country in the world”. It will be a strong encouragement for other countries post are supporting in early-stage exploration (St Lucia, Grenada and St. Vincent) to continue their low carbon journey with geothermal power as critical base load.

MULTI-TRUST FUND (AND NON-GRANT INSTRUMENT)

14. Madagascar. Science-based management of Biodiversity and Natural Resources for Economic Development Project (GEF ID 11694). Agency: World Bank; GEF Project Financing: \$ 20,000,053 including \$18,165,190 from the GEF Trust Fund and \$1,834,863 from LDCF; Co-financing: \$ 162,300,000.

✓ **Germany Comments**

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

- Germany welcomes this ambitious and innovative approach of setting up the Lemur Bond, nevertheless, points out that the project design is not yet sufficiently concrete. Hence, we encourage reducing the range of topics to be tackled by the project and focus stronger on biodiversity financing and to make it a cross-cutting issue in Components 1-3.
- Germany asks for clarification on how the 80,000 direct beneficiaries are derived and on how outcomes, activities and indicators are aligned. We also seek clarification on the results of core indicator 2b, as coastal and marine activities are planned but not reflected in the results. In addition, the allocation of 20% of the budget to climate information appears high

given its limited role in the project design, whereas marine and coastal management seems to be valued low with 20%.

- Germany suggests exploring further opportunities for a “ridge to reef” approach and for strengthening synergies between ongoing interventions in adjacent protected areas. The targeted areas, particularly Diana and Sofia, are located within regions where several biodiversity conservation initiatives are already underway, both terrestrial and coastal/marine.
- Germany recommends exploring cooperation and create synergies with the Legacy Landscape Fund. The project area is close to the Makira-Masoala landscape, which is home to several lemur species. This landscape is supported by the Legacy Landscape Fund since 15 years and managed by WCS. (<https://legacylandscapes.org/map/makira-masoala/>)
- Germany suggests considering exploring synergies, coordination and collaboration, in addition to the PADDI program, with these projects and initiatives to enhance impact and avoid overlap, especially in the Diana and Boeny regions: West Indian Ocean Governance Initiative (WIOGI) – BMZ-funded (2025–2028) – Diana region; Southwest Indian Ocean Fisheries 2 – BMZ-funded, implemented by WWF (2025–2029); Pêche Côtière Durable (PCD) – BMZ-funded, implemented by KfW (2018–2029).
- Germany encourages creating synergies with ongoing projects by GIZ and KfW on regenerative energy and rural electrification. We would suggest considering photovoltaic solutions instead of natural gas when trying to substitute firewood and charcoal for cooking (cf. p. 57, conservation investment payments, V).
- Germany proposes that the initiative promotes the establishment and/or strengthening of seascape committees as the number of ongoing projects (e.g. WWF, GIZ, KfW) in the proposed intervention zones (especially in Diana Region) is high. Enhanced coordination mechanisms and systematic information sharing are essential to maximize synergies and avoiding duplication.
- Germany recommends that the proposal explicitly addresses in Component 2b (and 1) strategies to support legal and institutional recognition of Locally Managed Marine Areas (LMMAs). Additionally, the proposal should reference the existing Marine Spatial Planning (MSP) initiative in the Nosy Be area, which can serve as a valuable model for replication in other regions. Moreover, the involvement of the Ministère de la Pêche et de l'Économie Bleue (MPEB) would be essential for ensuring both ownership and effective implementation. We recommend that their involvement is more clearly defined in the project.
- Germany suggests that the support of value chains should consider a longterm economic strategy for Madagascar for seaweed and sea cucumber.
- Aquaculture models have demonstrated success in other parts of Madagascar. While replication of these models is encouraged, the proposal should place stronger emphasis on the development of post-harvest value chains and innovations. This would help retain value addition within Madagascar, rather than focusing solely on the export of raw or minimally processed products.

- Germany welcomes the acknowledgement of the gender dimension, but gender activities could be more cross-cutting. Gendermainstreaming in protected area institutions and trainings should be part of it as well.
- Germany suggests reassessing the core objective “Increased people with enhanced resilience to climate risks”. The proposal does not explain how this resilience will be measured. As this is a key outcome of the project, the indicators and methodology for measuring resilience to climate change should be further elaborated. Alternatively, the objective could focus on strengthening biodiversity-based livelihoods by applying models of bioeconomy, considering indicators on income generation of rural households or cooperatives, or on revenues of micro-enterprises in bioeconomy.
- Germany proposes detailing further on the business development and private sector engagement approach in the project design, which are critical factors for ensuring long-term sustainability and local ownership. Germany requests to include more detailed plans for private sector involvement and clearly articulate mechanisms such as Public-Private Partnerships (PPPs) or other relevant approaches.

✓ **Norway & Denmark Comments**

- The context description in the project document is accurate and reflects well the challenges Madagascar is facing in terms of nature loss, poverty, climate shock etc.
- USAID has for decades been a key funder of nature and biodiversity programmes in Madagascar and is leaving an important gap. New and innovative investments in this space is therefore highly welcome and the current proposal has several interesting features, and the integrated landscape/seascape approach responds well to the needs in Madagascar.
- The development of the Lemur bond approach is particularly interesting, given the positive experience with the Rhino bond.
- However, the risk factors are substantially higher in Madagascar given the high poverty levels and the strong correlation between poverty and nature loss. Activities under the project will need to have a strong focus on communities and incentivizing changes in production systems and value chains. This component could benefit from more detail in the proposal.
- There are substantial risks to the programme. These risks are recognized in the risk matrix, which is positive. It will however be important with adequate resources for close follow-up throughout the implementation.
- Depending on the final selection of intervention zones, the project should seek to build on previous achievements in terms of structuring of communities, developments of management plans etc. as several stakeholders have been investing substantially in similar activities for decades.
- In that respect, it is positive that the World Bank seeks synergies with Enabel and AcelREDD investments.

✓ **United Kingdom Comments**

- UK post in Madagascar's overall comments concern the importance of political stability and government continuity, especially for the Madagascar Science-based management of Biodiversity and Natural Resources for Economic Development Project, given that the incumbent minister championed and launched the lemurs bond linked to the integrated approach. Project delivery is often delayed because of cabinet reshuffle and leadership priority changes.