



Comments from Germany on LDCF/SCCF and GEF TF Programming
Maria Buss

to:

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2 Attachments



Germany Comments LDCF SCCF Strategy - RS_2013_0363574 - RS.pdf



Germany_Comments GEF-6 Programming II - RS_2013_0403241 - RS.pdf

Dear Colleagues,

Please find attached the German comments on the GEF-6 Programming Directions as well as on the LDCF/SCCF Programming strategy which was presented at the last Council Meeting.

Best regards,
Maria

Maria Buß

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3rd Meeting for the Sixth Replenishment of the Global Environment Facility (GEF-6)
Paris, 10-12 December 2013

Agenda item: GEF-6 Programming Directions

(Document GEF/R.6/20)

- Comments from Germany -

1. Integrated Approaches

- Germany welcomes the fact that the GEF has established clear links between the Integrated Approaches and the goals of the Conventions for which the GEF serves as a financing mechanism.
- Germany requests the GEF to specify how it will ensure access for all recipient countries and for all implementing organizations. At present, it is not clear how implementation will be organized. As the GEF continues to develop and fine-tune the Integrated Approaches, it should, in Germany's view, design decision-making processes in such a way as to ensure maximum country ownership. This requires transparent, participatory governance arrangements. Germany would like to draw attention to the fact that, as we all know, the GEF Secretariat has no mandate for project development and implementation. Germany also requests the GEF to specify how the private sector will be brought on board.
- In order to ensure that the Approaches have systemic impact, sufficient resources need to be allocated to them. Germany believes that an amount of 45 to 50 million euros (similar to the allocations for the Global Fisheries program and for the Commodities Supply Chain program) is not enough.
- Under GEF-5, 50 per cent of the resources from the Sustainable Forest Management (SFM) program have been programmed so far (125 of 250 million euros). This funding has been combined with country allocations on the basis of a 1:3 ratio. As a result, it has been possible to provide as much as 500 million euros for SFM so far. The program is considered a success, even though the resources allocated under GEF-5 will not be used in full. Given this background, Germany proposes that part of the SFM resources be used, under GEF-6, for the Amazon Basin Integrated Approach or for other Integrated Approaches.

Program 1: A New Development Path for the Amazon Basin

- Germany still requests a more detailed analysis of the region's heterogeneity and of existing conflicts of interest between the countries concerned.
- Ecuador, Bolivia and Venezuela should not be barred from participation in the program.
- As requested by Germany, the GEF has made the drivers of deforestation a stronger focus (reducing attention for sustainable forest management). But in Germany's view, that focus could be even stronger.

The creation of protected corridors has only been addressed inadequately, if at all. Germany would like the GEF to remedy that.

Program 4: Commodities

- Germany requests a detailed description of how the GEF will work together with sustainability standard initiatives (such as RSPO, RTRS, FSC) and with existing national initiatives and international private-sector initiatives (such as the Tropical Forest Alliance of the Consumer Goods Forum and the Palm Oil Forum).
- Germany had requested that the approach not only focus on group certification but also on synergies between private-sector initiatives and legislative processes such as FLEGT requirements and standard systems in the REDD process in producer countries. GEF projects should also seek to harmonize existing procurement rules in terms of sustainability criteria.

Program 5: Sustainability and Resilience for Food Security in Sub-Saharan Africa

Some of Germany's comments have been incorporated. The GEF has not included the partners proposed by Germany, ICRAF and FORNESSA.

2. Strategies for the environmental areas

Germany strongly recommends reintroducing the expected outputs in the results framework of each focal area.

a) Biodiversity

- Insufficient attention has been given to a number of openings for synergies and to some new topics (for instance ecosystem-based adaptation; challenges in the mining sector).
- It is not the GEF's job to support research. Germany continues to request deletion of the reference to regional support for research in the section on financing the goals of the Nagoya Protocol. Support for IPBES has been deleted in the new draft Programming Directions, as requested by Germany.
- Access and benefit sharing (ABS)
 - o ABS has still not been mainstreamed in the programs. The GEF cites the "incipient nature" of ABS as a reason for making this a separate program (section 73, p. 21). But this should be viewed in a more differentiated manner, as there are great differences between countries.
 - o Germany would like to propose once more that the GEF support specific projects for the development of ABS agreements.
- Protected areas
 - o Regarding the outcome for protected area management effectiveness (BD 1, Program 1, outcome 1.2 on p. 28), Germany feels that it would be desirable that the document reflect the current debate and reference be made to countries' obligations under the CBD Program of Work on Protected Areas, and there should be more emphasis on the improvement of the diversity and quality of protected area governance.

The management effectiveness outcome should be complemented by an outcome on protected area governance.

- In view of the detrimental impact of mining on biodiversity, Germany had recommended that the protection of biodiversity from the negative impacts of mining be included (on a region-by-region basis). This has not yet been done. There are unused synergies with the environmental areas of SFM/REDD and "International Waters" and with the new mercury window.
- Ecosystem-based adaptation (EBA)
 - Germany continues to believe that specific actions for ecosystem-based adaptation should be included in the programs.
- The Economics of Ecosystems and Biodiversity (TEEB)
 - Germany feels that there is still too much focus on the economic valuation of biodiversity and ecosystems. If there is a too one-sided focus on economic valuation studies, we will fail to achieve our goal of influencing political and/or investment decisions, for instance with a view to triggering reforms of harmful subsidies or the implementation of incentive-based policy instruments for biodiversity conservation. So the term "valuation" should be deleted from the title, as had been requested by Germany earlier.

b) Climate Change Mitigation

- With regard to actions for the reduction of SLCFs, the document should state clearly that the GEF will only fund such activities to the extent that they are covered by the goals of the UNFCCC.
- In accordance with the draft GEF 2020 Strategy (and Germany's comments on that document), the GEF-6 Programming Directions should contain even stronger language in terms of requiring GEF projects to be highly innovative. This goes, for example, for the transition to efficient (cooling) technologies. The GEF should not support or perpetuate any transition technologies (HFC projects) that might run counter to the goals of other GEF focal areas. Section 31 of the Programming Directions mentions the need for assessing technological potential in the country context. It is Germany's view that the inclusion of demonstration plants outside the national borders is certainly an option – for one thing because regions may have similar characteristics and, for another, because it is a focal task of the GEF to develop market structures for new, environmentally friendly technologies.
In section 80, Germany's call for adding a criterion called "Innovative project with a potential for transformative change toward low-carbon development" has not yet been heeded.

c) Chemicals and Waste

- The GEF's focus in the chemicals area should not be limited to clean-up and reduction. It should also include the demonstration of clean alternative technologies and substances (section 24 on p. 81). This should be reflected in the second Strategic Objective. To that end, we should add "and support the implementation of clean alternative technologies/substances with low, preferably zero GWP" after "Reduce the prevalence of harmful chemicals and waste."

d) International Waters

- In the second round of the replenishment negotiations, Germany had stated that the pilot program for the protection of marine biodiversity in ABNJs which had been introduced under GEF-4 should be continued under GEF-6, and considerably more attention should be given to implementing the decisions of CBD (especially the Strategic Plan and the identification of Ecologically or Biologically Significant Marine Areas, EBSAs). Still, none of the programs reflect this.

3. Corporate Programs

a) Cross-cutting Capacity Development Strategy (CCCD)

- Given the fact that financial resources for non-area-specific capacity building are to be reduced, Germany recommends that the GEF should not help to develop new institutional networks and information centers (p. 202) but should support existing ones.
- Germany welcomes the plan to pilot innovative economic and fiscal instruments to implement the Conventions in GEF recipient countries. With regard to the studies that are first to be undertaken to develop relevant approaches, Germany believes that country-specific analyses are needed in order to facilitate optimum implementation of the instruments at a later point.

b) Small Grants Program (SGP)

- With regard to the envisaged information exchange platforms (p. 207), Germany requests information about the level GEF resources earmarked for this purpose. It should be ensured that the bulk of the resources is available for micro projects.
- Germany is skeptical about the use of microcredit under the SGP. In Germany's view, there should be a needs assessment and a statement about the comparative advantages of microcredit if this tool is to be used under the SGP. The document also fails to provide information about implementation modalities.