

Stichworte/ Kommentare zur concept note der Weltbank

**I) Appreciation of the consultation process**

**II) Right Time**

CN comes at the right time, many relevant ongoing international processes with implications on the environmental agenda for the next years:

- Climate negotiations after Copenhagen/ Copenhagen Accord: adaptation funding 30 bio US\$ 2010 – 2012, 100 bio US\$ from 2020 on

- International Year of **Biodiversity**, with 10<sup>th</sup> Conference of the Parties of the Convention on Biological Diversity and UNGA Special Session

- Rio + 20 Conference in Brazil 2012: **institutional framework for sustainable development** (how do you see the future role of UNEP/ UNEO/ WEO?) and **green economy**

- MDG summit in September 2010: How do we deal with the MDGs after 2015?

**III) Concept note reflects the spirit of the Paris Declaration / Accra Agenda for Action on Aid Effectiveness:**

- Intention/ approach to **use the country systems**, one of the main outcomes of Accra; assistance in the environmental field needs alignment with long term visions and development plans and programmes of partner countries. Support for the environment should be administered by the relevant national authorities in partner countries, coordination on general issues be placed in powerful central bodies such as Prime Minister Offices

or Offices of the President or planning agencies. Link to National Adaptation Programmes of Action crucial but the question is *how* to implement that.

- **Outcome orientation:** very much in line with the focus on impact indicators – Germany is willing to cooperate closely with the World Bank Group on the elaboration of these indicators
- **Harmonisation:** focus on PBAs, SWAPs fine for us
- No “one size fits all approach” but differentiation along different kinds of clients: that is fine; central is coordination on the ground, led by the partner govt.  
Missing: inclusion of South-South Cooperation, e.g. South South Exchange Facility Trust Fund

#### **IV) Specific comments:**

- Integration of Environment and Development absolutely crucial for us
- **Concept of a green economy** seems to be underlying, yet should be spelt out more. Includes also aspects regarding attitudinal change / changing the mindset in developing countries and in our home countries; question of potential conflict between local priorities and global public goods is relevant but manageable: there are win-win situations as in sustainable forest management and REDD: developing countries and the global climate as well as biodiversity benefit at the same time; respective concepts are relatively further elaborated and accepted, but the strategy could benefit from more focus on PES (payments for ecosystem services)
- More emphasis **on Biological Diversity** (Chancellor Merkel mentioned that biodiversity has the same importance for her government as climate change)
- Paper touches on interlinkages with other areas: More focus on the importance of political leadership / ownership and esp. **Governance**

**issues** (including questions of decentralisation, fight against corruption, coherence of partner government policies, participation – esp. indigenous peoples) is needed

focus more on synergies with energy, agriculture, forestry

- “beyond mainstreaming”, stronger focus on portfolio: we in Germany intend to do the same with our Strategic Environmental Assessment which deals with all the different levels: from “SSP” to programme components
- innovative financing instruments: we are very much interested in an exchange of ideas on these
- agree also with the importance of capacity development: among other issues we consider the following to be important: greening development planning (making the economic case for integrating the environment into key national policies and programmes), greening national budgets (multi year budgeting represents key opportunity to mainstream the environment). Issues in country systems, i.e. stability particularly good for (long term) environmental investments. Lack of economic valuation of benefits and costing of environmental programmes as a barrier to their inclusion in national budgets. Also capacity in Ministries of finance / planning is necessary to understand the benefits (growth/health) of environmental programmes

#### **V) Questions:**

- Concept note seems to address more or less all the relevant topics and envisages also readiness to deal with all these issues: Where does the World Bank Group see their specific **comparative advantage**?
- Prioritization (like in the CA) for most vulnerable developing countries, such as LDCs, SIDS and Africa?  
Hierarchy of the goals: Poverty alleviation as “overarching goal”?

- Will the indicators from the relevant conventions (e.g. CBD Strategic Plan – ongoing post 2010 strategic planning) be taken as a basis for the development of an indicator system to the World Bank Group Environment Strategy?