

CSO Comments on FP094 UNDP Comoros (BM21, October 2018)

Ensuring Climate Resilient Water Supplies in Comoros

This adaptation project for an LDC and SIDS appears to be a well-planned response to anticipated climate impacts on water resources. While the project could have been oriented toward a deeper sense of sustainable development and achieving co-benefits with the addition of sanitation and hygiene programs and the expansion of ecosystem-based adaptation--and it is key that the GCF sends signals to promote and encourage the transformational potential of adaptation projects--we look forward to the implementation of the project with strong stakeholder engagement and well-resourced gender-responsive activities.

While this proposal is appreciated for its attention to climate relevance, its detailing of the precise adaptation needed for predicted climatic changes reiterates civil society's call that the GCF must send signals that full cost funding for adaptation is available and appropriate, and that adaptation activities can and should involve a range of activities to achieve transformational impact. Furthermore, we must recognize that we do already live in a world where climatic changes are happening; attempting to stringently separate current development needs from future needs labeled as adaptation may actually underestimate the depth and breadth of adaptation necessary.

The Secretariat notes in its assessment, "the project seeks to strengthen water security by providing water storage tanks, and new boreholes, to maintain water security in the face of climate change. This will impact human health and well-being positively, although complementary sanitation and hygiene programmes would have had a significant multiplier effect." Indeed, we hope that multiplier effects can and will be sought as projects are designed with sustainable development and the resiliency of communities in mind.

The ITAP's note that the ecosystem-based adaptation activities were vaguely defined and insignificantly budgeted is well taken, and the reliance on infrastructure solutions rather than more comprehensively and substantially integrating not only support for but implementation of activities such as revegetation, reforestation and establishment of riparian barriers reflects another way in which this adaptation project is unfortunately narrower than it could have been.

We are eager to follow the tariff reform efforts in the hopes that a progressive, socially-responsible tariff structure, grounded in an understanding of economic constraints of the users, is indeed ultimately enacted. It is imperative that users' ability and willingness to pay is a driving consideration of the tariff structure not overshadowed by the desire for user fees to cover the costs of maintenance and operations. Noting particularly the variable and at times unaffordable costs associated with current water use, a well-planned tariff reform process, designed in conjunction with communities, does hold the potential to achieve real economic benefits for individuals and communities.

The alignment of the gender action plan activities with reasoned and substantive budget lines is appreciated. The GAP targets, however, should be differentiated beyond the general idea of beneficiaries and set goals for the specific, listed indicators to fully realize the role of the GAP in monitoring and evaluating progress on gender equality. We look forward to this GAP continuing to be refined with stakeholder input during project inception.

We appreciate the accredited entity, UNDP, proactively sharing its annexes with civil society and hope others will follow suit in their information disclosure practice