Part I: Project Information		Response
GEF ID	10343	
Project Title	**Biodiversity mainstreaming in sectoral policies and practices and strengthened protection of biodiversity hot-spots in Montenegro**	
Date of Screening	6-Dec-19	
STAP member Screener	Rosie Cooney	
STAP secretariat screener	Virginia Gorsevski	
STAP Overall Assessment		**Minor issues to be considered during project design:** STAP welcomes the project entitled "Biodiversity mainstreaming into sectoral policies and practices and strengthened protection of biodiversity hot-spots in Montenegro" submitted by UNDP. STAP is pleased to see such a strong focus on improved management of protected areas and biodiversity mainstreaming in the tourism, forestry and agricultural sector. The development of a national spatial plan is similarly a positive development; however, STAP cautions against viewing the plan as an outcome; rather it is a means by which to achieve changes in sector policies and practices by combining and analyzing data in a common system with diverse stakeholders. STAP is concerned that this project, while worthwhile, suffers from attempting to accomplish too much without a clear, logical theory of change that describes how each of the components related to each other, including underlying assumptions. The TOC provided in this project reads more like a general hypothesis than a coherent linked set of outcomes that combined, will lead to conservation of biodiversity in and around protected areas and for that reason STAP recommends that during PPG phase, a concerted effort is made to revise the TOC in a way that more clearly links proposed interventions with barriers to success in achieving a more focused objective.
Part I: Project Information		
B. Indicative Project Description Summary		
Project Objective	Is the objective clearly defined, and consistently related to the problem diagnosis?	Somewhat. The stated project objective highlights the fact that the project may be attempting to accomplish too many things and would benefit from greater focus. Specifically, the project targets PAs, KBAs, and production sectors including agriculture, tourism and forestry and risks spreading itself too thinly. Some specific points In Outcome 1, the different outputs and the outcome use variously national PAs, KBAs covered by the PA system, 6 PAs, and targeted PAs as the focus of action - are these all referring to the same areas? Needs clarification/consistency. For output 1.3, surely the priorities for action should emerge from outputs 1.1 and 1.2 rather than being determined in advance? In Outcome 2 we've moved from KBAs to hotspots, then move back to KBAs for Outcomes 4 and 5 - why? Re indicators, the increase in visitors to PAs used as an indicator in Outcome 2 is not necessarily a good indicator for biodiversity mainstreaming into tourism - unless the model of tourism followed here is biodiversity-positive or at least biodiversity-"friendly". This isn't the case for many examples of tourism in PAs, so this is an important distinction. Note too there is a difference between the output 3.2 of small-scale tourism business introducing biodiversity-sensitive business models, which implies they change their business model, to the indicator of operators introducing biodiversity-sensitive tourism products, which could mean they continue the biodiversity-unfriendly products as well as introducing biodiversity-friendly ones. It is questionable whether the latter really represents biodiversity mainstreaming. Outcome 4 needs an output that involves actually implementing the standards developed in Output 4.1. Also, the indicator here should specifically refer to forests around KBAs, in order to support the Outcome 4. Likewise for Outcome 5.
Project components	A brief description of the planned activities. Do these support the project's objectives?	Broadly speaking, yes. The project includes 2 components - one on protection of KBAs (not necessarily PAs?) and one on BD mainstreaming in 3 sectors.
Outcomes	A description of the expected short-term and medium-term effects of an intervention.	The outcomes are described as 1) improved capacity for PAs; 2) BD conservation arrangements in place; and 3 - 5) BD mainstreamed for tourism, forestry and agriculture sectors, respectively.
	Do the planned outcomes encompass important global environmental benefits/adaptation benefits?	Outcome 1 is strengthtend capacity of existing national PAs, which doesn't make sense - perhaps they mean improved capacity of PA management personnel? Outcome 2 is BD conservation arrangements in place outside of PAs; however, it is unclear what is meant by arrangements and this in and of itself doesn't seem to be an outcome, but rather an output that would lead to an outcome whereby biodiversity is mainstreamed in certain sectors (which is Outcome 3 - 5)

		Are the global environmental benefits/adaptation benefits likely to be generated?	The project expects 150,040.00 ha in new terrestrial protected areas; however, all of the parks are already protected so they can't be 'newly created.' Perhaps these areas should be moved to Indicator 1.2 re improved management effectiveness? An additional 80,000 hectares is expected to be under improved management outside of protected areas which accounts for BD mainstreaming under Component 2. Slightly troubling is the statement that much of this will be accomplished through spatial planning. Spatial planning is a critical first step, but it is only a tool that can bring people together to make decisions but until specific action is taken beyond spatial plans, biodiversity will not be conserved.
Outputs		A description of the products and services which are expected to result from the project. Is the sum of the outputs likely to contribute to the outcomes?	There are a total of 15 outputs for this project. While many of them make sense and are valuable, in some cases they are not sufficient or in the wrong order to achieve the desired outcome (for example, Outcome 2 is BD conservation arrangements in place for BD hot-spots outside of PAs and the first output is mechanisms for protection identified and set for implementation and the second output is a spatial plan for the whole country developed and adopted that includes BD. Wouldn't the development of the plan need to preceed the development and implementation of mechanisms?) In sum, there are many good outputs but the don't seem to follow a logical sequence that begins with gathering data to inform a spatial plan, etc.
Part II: Project justification		A simple narrative explaining the project's logic, i.e. a theory of change.	
1. Project description. Briefly describe:			
1) the global environmental and/or adaptation problems, root causes and barriers that need to be addressed (systems description)		Is the problem statement well-defined?	Threats and drivers are listed as: changes in LU practices in forestry and agriculture, unsustainable tourism and infrastructure development, unsustainable and illegal use of natural resources and climate change. Underlying causes include inadequate enforcement of relevant regulations and weakness in management of PAs. This is reasonably clear, but given that the project focuses on PA management and practices in tourism, agriculture and forestry, the problem statement should clarify what the roles of these sectors are in contributing to the current problems in more detail- very little is said on this. For example, what are the current threats to biodiversity in PAs? What threats are associated with tourism? Without this, it is hard to assess whether implementation of the actions in this project will actually address the threats to biodiversity. Also, a clear description of the KBAs in the country - the number, extent, types of habitats and overlap with PAs - is necessary in order to understand the project rationale. Re threats to species, the proposal states "Unsustainable and illegal use of natural resources - harvesting of medicinal herbs, non-timber forest products, hunting and fishing practices, as well as persecution of species considered as vermin... - remain as the main threats to species". The reference provided is the Montenegrin national report to the CBD, but this report does not state this, and indeed says there is little information on e.g. game stocks in order to assess the level of threat (see e.g. p25 at https://www.cbd.int/doc/nr/nr-06/me-nr-06-en.pdf). This needs to be more precise, accurate and well-referenced. Re projected impacts of climate change, it is good that these are specifically described, but more specificity would be helpful - some of the text here is rather vague. For instance: "Dry periods may be followed by periods with strong and extreme rainfall, which will cause destruction and reduction of populations of land and freshwater species in higher mountainous regions." - why will this cause population reduction? Of what sorts of taxa?
		Are the barriers and threats well described, and substantiated by data and references?	Threats are described (as above) but not the barries to possible solutions for overcoming these threats. Little or no data is referenced.
		For multiple focal area projects: does the problem statement and analysis identify the drivers of environmental degradation which need to be addressed through multiple focal areas; and is the objective well-defined, and can it only be supported by integrating two, or more focal areas objectives or programs?	N/A
2) the baseline scenario or any associated baseline projects		Is the baseline identified clearly?	BD mainstreaming and spatial planning and sectoral development baseline information is provided.
		Does it provide a feasible basis for quantifying the project's benefits?	Baseline information is useful for understanding where the country stands in terms of planning and development but no real quantitiative information on species, etc. for the areas of interest.
		Is the baseline sufficiently robust to support the incremental (additional cost) reasoning for the project?	No.
		For multiple focal area projects:	
		are the multiple baseline analyses presented (supported by data and references), and the multiple benefits specified, including the proposed indicators;	N/A
		are the lessons learned from similar or related past GEF and non-GEF interventions described; and	N/A
		how did these lessons inform the design of this project?	N/A

3) the proposed alternative scenario with a brief description of expected outcomes and components of the project	What is the theory of change?	While there is a section called TOC, this does not really constitute a TOC, which should set out a pathway or pathways the project will follow in order to reach its objectives, with accompanying assumptions/risks at each stage. The TOC presented here supports an integrated approach that includes both protected areas and key sectors outside of PAs (tourism, forestry and agriculture) with the assumption that by including all of these elements into one project it will likely be more successful than if doing so sector by sector. This has some merit; however, the flip side is that if all of these are not successful together than no progress will be made for any of the parts. And since the project is spread out so thinly across many activities, there is a risk that the whole thing will fall apart.
	What is the sequence of events (required or expected) that will lead to the desired outcomes?	The focus of the project is on KBAs, but this is not well justified by the problem statement - are these negative impacts on biodiversity occurring in KBA areas?
	· What is the set of linked activities, outputs, and outcomes to address the project's objectives?	The initial description of the proposed alternative scenario is very unclear (p 11 section 1.a.3). What are the "pilot" PAs? For KBAs outside of PAs, it is not clear if the plan is to start the process to make them PAs, or to look at other management options for conservation of these areas. What "project area map" is referred to in the final paragraph? What hotspots are referred to here, and how do these relate to the KBAs? The term hotspot generally refers to this CI categorisation (https://www.cepf.net/our-work/biodiversity-hotspots), and the whole of Montenegro is within one - using the term in the way used here is very confusing. Output 1.1: these newly emerging threats could have usefully been described in the problem statement. The description of output 1.1 here does not seem to be consistent with the output 1.1 described in section B. Indicative Project description summary. The latter is focused on KBAs covered by PAs, whereas the activities described here seem to be in part about assessing whether the coverage of PAs is adequate. Outcome 3 seems to rest entirely on voluntary measures - is there some reason regulatory standards are not foreseen? The biodiversity component of Output 3.3 appears rather weak. Re Output 3.4, the link to improved biodiversity conservation needs to be articulated. Outcome 4.1 focuses on increasing production of various NTFPs - but this, as it is written, could be highly dangerous for biodiversity. Sustainable use of NTFPs can be extremely beneficial if it incentivises conservation through e.g. returning benefits to local communities, but there is nothing necessarily beneficial about increasing production of these, particularly as the problem statement suggests over-harvest is a current problem. Should this not rather be focused on improving management of harvest and increasing benefits to local people? In Output 4.2, referring to cultivation of mixed forests in relation to HCVforests is confusing, given the latter will be natural forests rather than plantations.
	· Are the mechanisms of change plausible, and is there a well-informed identification of the underlying assumptions?	In many ways, the spatial plan is seen as the main mechanism of change that will glue together all of the various pieces. While spatial planning is key, this should be the first step in the process and used to bring together stakeholders and gather data (which apparently is lacking) to justify activities that are proposed in this project). One of the underlying problems identified at the forefront is the inadequate enforcement of relevant regulations and yet nowhere in the project outcomes or outputs is this addressed directly. Even the best spatial plan will be inadequate if this underlying cause is not addressed.
	· Is there a recognition of what adaptations may be required during project implementation to respond to changing conditions in pursuit of the targeted outcomes?	No.
5) incremental/additional cost reasoning and expected contributions from the baseline, the GEF trust fund, LDCF, SCCF, and co-financing	GEF trust fund: will the proposed incremental activities lead to the delivery of global environmental benefits?	A comparison of baseline and GEF scenario for Components 1 and 2 (page 26) shows that for Component 1 the GEF project will strengthen management of PAs and provide mechanisms and spatial planning which are incremental; however, the baseline case shows that the existing legal and institutional framework are not sufficient so it's not clear that those incremental changes are spacifically addressing this problem. For Component 1 on biodiversity mainstreaming, the incremental scenario does specifically address the lack of inentives, best practices, etc. that have been lacking to date.
	LDCF/SCCF: will the proposed incremental activities lead to adaptation which reduces vulnerability, builds adaptive capacity, and increases resilience to climate change?	N/A
6) global environmental benefits (GEF trust fund) and/or adaptation benefits (LDCF/SCCF)	Are the benefits truly global environmental benefits, and are they measurable?	Benefits to biodiversity are global (and local) and can be measured if relevant data are acquired during PPG phase or as part of the project (i.e. during the spatial planning phase).
	Is the scale of projected benefits both plausible and compelling in relation to the proposed investment?	The project seeks to accomplish too many things for a limited budget and no clear indication of support in terms of regulatory, policy, enforcement action.
	Are the global environmental benefits explicitly defined?	No apart from hectares as per required indicators

	Are indicators, or methodologies, provided to demonstrate how the global environmental benefits will be measured and monitored during project implementation?	There seems to be a mistake with the indicators. The 150K ha in indicator 1 (p12) should be within the "improved management effectiveness" indicator, not newly created.
	What activities will be implemented to increase the project's resilience to climate change?	Climate change is mentioned as a threat but no specific activities are outlined to address this challenge through the project.
7) innovative, sustainability and potential for scaling-up	Is the project innovative, for example, in its design, method of financing, technology, business model, policy, monitoring and evaluation, or learning?	While none of the elements are particularly innovative globally, they do represent innovations at national level with the potential to significantly alter current trajectories of biodiversity loss.
	Is there a clearly-articulated vision of how the innovation will be scaled-up, for example, over time, across geographies, among institutional actors?	Replication for other PAs and transboundary PAs in the Dinaric region is mentioned.
	Will incremental adaptation be required, or more fundamental transformational change to achieve long term sustainability?	Given the underlying drivers of biodiversity loss and lack of planning, regulation and enforcement, it is likely that fundamental transformation change will be needed to solidify new policies, incentives, practices, etc. to promote long term change that preserves biodiversity in PAs and across key sectors.
1b. Project Map and Coordinates. Please provide geo-referenced information and map where the project interventions will take place.		A map is provided in the PIF in Annex A that shows different land cover types and existing and planned PAs with a link to more detailed maps; however, these can not be accessed by STAP. Geo-coordinates are not available.
2. Stakeholders. Select the stakeholders that have participated in consultations during the project identification phase: Indigenous people and local communities; Civil society organizations; Private sector entities.If none of the above, please explain why. In addition, provide indicative information on how stakeholders, including civil society and indigenous peoples, will be engaged in the project preparation, and their respective roles and means of engagement.	Have all the key relevant stakeholders been identified to cover the complexity of the problem, and project implementation barriers?	The main stakeholders for this project appear to be government agencies and the public sector. Since this is such a wide-ranging project that includes the development of a spatial plan for the entire country and which focuses on key sectors such as tourism, forestry and agriculture then it makes sense that representatives from these sectors (i.e. tourism operators, hotels, farmers, etc) be included as key stakeholders which provide input (including data) into the spatial planning effort. Other key stakeholders that would be good to involve include research organizations, academia, etc. Also, it would be nice to see consultation of municipal and local stakeholders at this stage, rather than only later.
	What are the stakeholders' roles, and how will their combined roles contribute to robust project design, to achieving global environmental outcomes, and to lessons learned and knowledge?	See above.
3. Gender Equality and Women's Empowerment. Please briefly include below any gender dimensions relevant to the project, and any plans to address gender in project design (e.g. gender analysis). Does the project expect to include any gender-responsive measures to address gender gaps or promote gender equality and women empowerment? Yes/no/ tbd. If possible, indicate in which results area(s) the project is expected to contribute to gender equality: access to and control over resources; participation and decision-making; and/or economic benefits or services. Will the project's results framework or logical framework include gender-sensitive indicators? yes/no /tbd	Have gender differentiated risks and opportunities been identified, and were preliminary response measures described that would address these differences?	This is rather weak, with little specific information about barriers facing women or how they will be addressed.
	Do gender considerations hinder full participation of an important stakeholder group (or groups)? If so, how will these obstacles be addressed?	As above.
5. Risks. Indicate risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved, and, if possible, propose measures that address these risks to be further developed during the project design	Are the identified risks valid and comprehensive? Are the risks specifically for things outside the project's control?	Many of the risks identified are internal to the project (i.e. length of time required to do spatial planning, lack of financial viability of proposed actions, unsuccessful partnerships with the private sector, etc.). The only external risk has to do with barriers faced by marginalized groups (not sure if that is a barrier?). Climate change is mentioned earlier as a threat but not as a specific risk to the project. The project relies a lot on uptake of voluntary measures in identified sectors - isn't there a risk that these have little impact in changing damaging practices?
	Are there social and environmental risks which could affect the project?	Possibly but they are not described in this section apart from the aforementioned risk of marginalized groups.
	For climate risk, and climate resilience measures:	

	· How will the project's objectives or outputs be affected by climate risks over the period 2020 to 2050, and have the impact of these risks been addressed adequately?	This is flagged as an issue, although specific assessment of risks is deferred to project further planning/implementation.
	· Has the sensitivity to climate change, and its impacts, been assessed?	No
	· Have resilience practices and measures to address projected climate risks and impacts been considered? How will these be dealt with?	No
	· What technical and institutional capacity, and information, will be needed to address climate risks and resilience enhancement measures?	The PIF devotes a paragraph to the impacts of climate change on various ecosystems so it is clear that some work has been done in this area. But no references are cited or information about how this information can be used to asses climate risks that may impact the proposed project or inform specific interventions.
6. Coordination. Outline the coordination with other relevant GEF-financed and other related initiatives	Are the project proponents tapping into relevant knowledge and learning generated by other projects, including GEF projects?	Several prior GEF projects are mentnioned. There may be other relevant EU, GTZ, DfiD, etc. projects but they are not mentioned in this section. Some lessons are clearly flagged, but this could be considerably strengthened
	Is there adequate recognition of previous projects and the learning derived from them?	See above.
	Have specific lessons learned from previous projects been cited?	No. But later in the KM section the PIF states that during the PPG pahse, the project will build on prior lessons from other projects. It seems like this type of information would have been good to inform the TOC and project components.
	How have these lessons informed the project's formulation?	N/A
	Is there an adequate mechanism to feed the lessons learned from earlier projects into this project, and to share lessons learned from it into future projects?	None mentioned.
8. Knowledge management. Outline the "Knowledge Management Approach" for the project, and how it will contribute to the project's overall impact, including plans to learn from relevant projects, initiatives and evaluations.	What overall approach will be taken, and what knowledge management indicators and metrics will be used?	General information provided about knowledge exchange between stakeholders, etc. No metrics provided.
	What plans are proposed for sharing, disseminating and scaling-up results, lessons and experience?	As above.
STAP advisory response	**Brief explanation of advisory response and action proposed**	
1. Concur	STAP acknowledges that on scientific or technical grounds the concept has merit. The proponent is invited to approach STAP for advice at any time during the development of the project brief prior to submission for CEO endorsement.	
	* In cases where the STAP acknowledges the project has merit on scientific and technical grounds, the STAP will recognize this in the screen by stating that *"STAP is satisfied with the scientific and technical quality of the proposal and encourages the proponent to develop it with same rigor. At any time during the development of the project, the proponent is invited to approach STAP to consult on the design."*	
2. Minor issues to be considered during project design	STAP has identified specific scientific /technical suggestions or opportunities that should be discussed with the project proponent as early as possible during development of the project brief. The proponent may wish to:	
	(i) Open a dialogue with STAP regarding the technical and/or scientific issues raised;	
	(ii) Set a review point at an early stage during project development, and possibly agreeing to terms of reference for an independent expert to be appointed to conduct this review.	

	The proponent should provide a report of the action agreed and taken, at the time of submission of the full project brief for CEO endorsement.	
3. **Major issues to be considered during project design**	STAP proposes significant improvements or has concerns on the grounds of specified major scientific/technical methodological issues, barriers, or omissions in the project concept. If STAP provides this advisory response, a full explanation would also be provided. The proponent is strongly encouraged to:	
	(i) Open a dialogue with STAP regarding the technical and/or scientific issues raised; (ii) Set a review point at an early stage during project development including an independent expert as required. The proponent should provide a report of the action agreed and taken, at the time of submission of the full project brief for CEO endorsement.	