

Blue Nature Alliance to advance the high-quality protection of 1.8 billion hectares of ocean ecosystems

Review PIF and Make a recommendation

Basic project information

GEF ID

12294

Countries

Global

Project Name

Blue Nature Alliance to advance the high-quality protection of 1.8 billion hectares of ocean ecosystems

Agencies

CI

Date received by PM

3/3/2026

Review completed by PM

Program Manager

Andrew Hume

Focal Area

International Waters

Project Type

FSP

1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

11 March 2026:

Partly. The execution partner identifies Blue Nature Alliance, but BNA is not a legal entity and self-execution by CI cannot be identified at PIF stage pr GEF policy. Please replace this with "TBD".

3/30/2026:

Addressed.

4/6/2026:

Per latest guidance, please revert to previous comment and leave execution as TBD at this stage.

4/6/2026: Addressed

Agency's Comments

CI-GEF April 06, 2026:

EA has been changed to TBD

CI-GEF 03/26/2026

Per GEF Secretariate discussion on Mar. 19, 2026, this comment no longer applies. Conservation International has been listed as the anticipated executing entity under **General Project Information**.

2. Project Summary

Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected results?

Secretariat's Comments

11 March 2026:

Partly. Please include a short description of the project components and the specific GEBs expected by the project.

3/30/2026:

Addressed.

Agency's Comments

CI-GEF 03/26/2026

Project Summary now reads:

Ocean conservation areas, inclusive of MPAs and OECMs, have been shown to enhance climate resilience, support ecosystem connectivity and function, protect biodiversity, improve fisheries productivity, and strengthen human well-being. Scientists widely agree that securing a healthy, thriving ocean will require protecting at least 30% of the ocean through effective and well-managed area-based conservation measures.

This high-leverage global project is designed to accelerate the pace, scale, and quality of area-based conservation through the following objectives:

1. Improve the quality of existing ocean protections through direct site-based investments to measurably improve protection level, effectiveness, and durability of existing ocean conservation areas.
2. Catalyze designation of new large-scale ocean conservation areas through targeted support for strategic campaigns and direct site-based investments to support early implementation.
3. Increase ambition and catalyze new designations in underinvested regions through region and site-level investments to address systemic gaps limiting ocean protection.
4. Facilitate increased knowledge sharing and coordination through the sharing of project experiences and lessons learned with between partners, sites, and/or peer initiatives.

Through these objectives, the project will advance the high-quality protection of 1.8 billion hectares of ocean area. At the same time, it will also address the systemic barriers that impede progress towards achieving the ambitious global ocean conservation target outlined in the Kunming-Montreal Global Biodiversity Framework (KMGBF) Target 3, thereby catalyzing greater ambition and momentum for future ocean conservation action. Expected results of the project include 500M hectares of marine protected areas newly created, 1.3B hectares of marine protected areas under improved management effectiveness, at least 1 shared water ecosystem under new or improved cooperative management, level 4 engagement with IW:LEARN, and delivery of direct benefits to 15,000 people (50% women).

3 Indicative Project Overview

3.1 a) Is the project objective presented as a concise statement and clear?

b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

Secretariat's Comments

11 March 2026:

Partly.

1) Please explain the difference between Output 1.1.2 (achieve upgraded levels of protection) and Output 1.1.3 (achieve high management effectiveness thresholds). How are these tangibly different?

2) Component 2, which is the largest GEF funded component, with only one real output (Output 2.1.2) is light on details compared to the large scope of work under Component 1. What is the logic for this?

3) In the detailed description of Output 2.1.2, there are references to a "facility". What is this and how does it differ from BNA?

4) How will Component 3 integrate into existing regional strategies? If the focus is Africa, will it be the entire continent or a subregion like East or West Africa? There are numerous regional strategies that already exist, so it will be critical to understand how this additional effort will add value and not confuse an already complicated mosaic. To achieve this, it will be expected that the region(s) targeted by this component are identified by CEO Endorsement, including the necessary level of stakeholder engagement to ensure GEF and larger BNA partnership investment are complementary to existing and planned efforts in the respective regions.

5) How does Output 4.2.2 differ from Output 1.1.5 as both seem to be focused on building capacity of Alliance MPA partners. Why does Output 4.2.2. need to be separate?

6) Please clarify the rationale for setting a 33% target under Output 4.2.1. In the absence of a yet to be developed Gender Analysis and Gender Action Plan, please also consider whether this target could be increased to a minimum of 40%.

3/30/2026:

Partly addressed. No rationale was provided for setting the 33% percent target under Output 4.2.1 as previously requested. Please provide this rationale.

4/1/2026:

Addressed

Agency's Comments

CI-GEF April 1, 2026

Response below with edits made in text under *Project Components* to reflect this information.

The target has been adjusted to reflect that the project will aim for a minimum of 40% of beneficiaries of activities under Output 4.2.1 to be women. The 40% target has been set based on the percentage of women identified as having enhanced knowledge, capacity, and access to tools as a result of the Blue Nature Alliance. As of the project's FY25 PIR, the project reported 15,040 individuals with enhanced knowledge, capacity, and tools, and, of those with gender reported, 49.3% identified as women. The initial target of 40% is intended to be conservative and, based on the results of the Gender Analysis and Action Plan and identified opportunities to incorporate gender mainstreaming into project activities, can be increased during the PPG phase.

Aligned with this, the target has been adjusted under Output 4.2.2 to reflect that the project will aim for a minimum of 40% of participants in professional development opportunities to be women. The 40% target has been set based on the percentage of women currently participating in learning initiatives supported by the Blue Nature Alliance. As of the project's FY25 PIR, 46% of the 1,934 participants of learning initiatives were reported as women. This initial target is intended to be conservative and based on the results of the Gender Analysis and Action Plan and identified opportunities to incorporate gender mainstreaming into project activities, can be increased during the PPG phase.

CI-GEF 03/26/2026

1. Response below with edits made in text under **Project Components** to reflect this clarification in difference between Output 1.1.2 and Output 1.1.3.

Output 1.1.2: Financial and/or technical support is provided to implementing partners to achieve upgraded levels of protection pertains to level of protection from extractive or destructive activities within the ocean protection area. While final guidance for site-specific measures of success will be determined through the development of the comprehensive ocean protection quality framework to be developed during the PPG phase, measurable improvements in protection quality under this output are anticipated to align with increases in level of protection as defined by The MPA Guide (i.e. minimally protected, lightly protected, highly protected, fully protected) and/or IUCN protected area categories (i.e. VI ? Protected Area with Sustainable Use of Natural Resources, V ? Protected Landscape/Seascape, IV ? Habitat/Species Management Area, III ? Natural Monument or Feature, II ? National Park, Ib ? Strict Wilderness Area, Ia ? Strict Nature Reserve) through zoning/regulation or other legal means.

Output 1.1.3: Financial and/or technical support is provided to implementing partners to achieve high management effectiveness thresholds pertains to improvements in the structures and capacity to implement and actively manage an ocean conservation area. While final guidance for site-specific measures of success will be determined through the development of the comprehensive ocean protection quality framework to be developed during the PPG phase, measurable improvements in management effectiveness are anticipated to align with advancements along The MPA Guide's stages of establishment (i.e. proposed/committed, designated, implemented, actively managed) and will be informed by existing global MPA effectiveness frameworks (e.g. METT, Blue Park Standard, Large Marine Ecosystem Management Effectiveness Scorecard). Examples of potential measures of success under this output include:

? An ocean conservation area (or government agency responsible for this function) stands up a **formal management team/office** with formalized government positions that have management responsibility/authority to carry out the provisions of the gazette and site purposes.

? An ocean conservation area (or government agency responsible for this function) stands up a formal and staffed **monitoring, control, and surveillance system**.

? An ocean conservation area formalizes (legally or through formal agreement) a **co-management agreement and structure with Indigenous Peoples and Local Communities**.

? An ocean conservation area (or government agency responsible for this function) stands up a **Science, Research & Monitoring program**, with a formalized plan and regular data collection mechanism/system, including formal research partner and/or the stand up of a research team/capacity.

2. Response below with edits made in text under **Project Components** to reflect this logic.

The level of detail under Component 2 remains light as flexibility is still being maintained in this approach to be further refined during the PPG phase and continued flexibility in approach over the course of project implementation will also be maintained to allow for activities supported to remain responsive to actual and evolving needs on the ground. This flexibility will allow the project to assess where opportunities for new designations are anticipated based on an evolving geopolitical landscape (i.e. status of BBNJ Treaty, political will, economic pressures) and target support under Component 2 to the opportunities that are most significant and catalytic, with a reasonable likelihood of success.

Component 1 has a comparatively larger scope of outputs to provided nuance on the targets (i.e. protection level, management effectiveness, sustainable financing, durability) and coinciding area that is anticipated to contribute to Core Indicator 2.2: Marine protected areas

under improved management effectiveness, compared to the more straightforward target of area legally designated under Component 2 and in contribution to Core Indicator 2.1: Marine protected areas newly created. Further, as detailed in the project description, Outcome 1.2 and Outcome 1.3 are anticipated to indirectly support new designations as they build the enabling conditions necessary for governments to confidently advance the designation of new ocean conservation areas.

3. Response below with edits made in text under **Project Components** to reflect this information. Reference to 'facility?' has been removed from the detailed description of Output 2.1.2: Financial and/or technical support is provided to governments or government-endorsed partners to catalyze designations of new large-scale ocean conservation areas.

The mechanism of delivering financial support, in the form of a subgrant or contract, and/or technical support under this output does not differ from the Blue Nature Alliance. The initial reference was intended to acknowledge the differentiation in anticipated scoping process under Component 2 compared to the scoping and engagement framework development process under the first phase of project implementation and Components 1 & 3. While investments will continue to be guided by the Alliance's six criteria for site selection (i.e. significant, catalytic, political will, local champions, achievable, leverage) and will be approved by the Blue Nature Alliance Steering Council, support provided under Output 2.1.2 is intended to be made available at the direct request of government, with governments invited to approach the Alliance and request commitment for post-designation support in advance of a legal designation. With this commitment, the Alliance will work in partnership with government and/or government-endorsed partners to identify interventions and develop an engagement plan to advance early implementation of the site but, based on intervention types and the specific needs of the site, engagement plans may differ from the engagement framework process and template to be utilized under Component 1 and, as Output 2.1.2 will remain responsive to new designation opportunities as they arise, it is anticipated that sites and partners will continue to be identified beyond the PPG phase and throughout project implementation.

4. Response below with edits made in text under **Project Components** to reflect this information.

An extensive scoping and stakeholder engagement process will occur for the region(s) selected under Output 3.1.1: Regional strategy framework(s) to address regional ambition, implementation, and finance gaps are collaboratively developed with governments and implementing partner(s). This process will include an assessment of the regional and country-level strategies that already exists within the region(s) and engagement with all relevant existing and planned strategies and projects to ensure that the regional strategy developed by the Alliance is complimentary to and filling critical gaps in work already occurring in the region. The region(s) targeted by this component will be identified prior to CEO endorsement, including developing a comprehensive plan to ensure the necessary level of stakeholder engagement occurs during the PPG phase and, as necessary, early project implementation. The project anticipates focus on a subregion, with early scoping indicating potential for focus on Sub-Saharan Africa, which will allow the project to build upon relationships and a knowledge of the region developed through engagements under the first phase of the Alliance.

5. Response below with edits made in text under **Project Components** to reflect this information.

Output 1.1.5 and Output 4.2.2 are differentiated based on their scope and mechanism for delivering capacity building support to Alliance implementing (site-based/MPA) partners. Output 1.1.5 is intended to create a mechanism for expedited access to financial resources to allow Alliance partners to respond to emerging opportunities for their respective sites and, in the case of durability and risk of PADDD, threats as they arise. Support under Output 1.1.5

will primarily be given in the form of grants and/or contracts with access to complimentary technical support and, while capacity building of partners may be a component of activities under this output, focus will be on improvement of the site through support to advance adaptive management and innovative and/or collaborative management approaches to increase quality, effectiveness, and durability of the site.

While Output 4.2.2 may include the issuing of grants and/or contracts, support is anticipated to predominately come in the form of facilitating opportunities and covering associated expenses for individual managers or staff of Alliance partner organizations to engage in professional development. Activities under this output will focus on strengthening the technical and operational skills of the individual and, while the project anticipates sites will benefit as a result of this output as result of strengthened capacities of local practitioners, success will be measured based on the professional development and learning facilitated for the individual.

Additionally, to further differentiate between Component 1 and Component 4, Output 4.2.2 is separated from Output 1.2.1 and Output 1.2.2 to reflect variation in the goals and targeted beneficiaries of the outputs. Output 4.2.2. will provide targeted support to individual managers or staff of Alliance partners while Output 1.1.5 is intended to focus on global enabling conditions and advancing global strategy to scale marine management capacity development, including a Community of Practice that includes but is not limited to Alliance partners. While institutions and partnerships formalized under Output 1.2.1 and Output 1.2.2 will be utilized to support Alliance implementing partners, investments will be evaluated and selected based on their potential to advance the broader global strategy and Community of Practice.

6. Response below with edits made in text under ***Project Components*** (pg. 25-32) to reflect this information.

An initial conservative target of 33% has been set in the absence of a yet to be developed Gender Analysis and Action Plan. Based on the results of the Gender Analysis and Action Plan and identified opportunities to incorporate gender mainstreaming into project activities, this target can be increased during the PPG phase.

3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's Comments

11 March 2026:

Partly. As noted above, please clarify the rationale for setting a 33% target under Output 4.2.1. In the absence of a yet to be developed Gender Analysis and Gender Action Plan, please also consider whether this target could be increased to a minimum of 40%.

3/30/2026:

Not addressed. No rationale was provided for setting the 33% percent target under Output 4.2.1 as previously requested. Please provide this rationale.

4/1/2026:

Addressed

Agency's Comments

CI-GEF April 1, 2026

See above.

CI-GEF 03/26/2026

See above.

3.3 a) Are the components adequately funded?

b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?

c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

11 March 2026:

Yes

Agency's Comments

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's Comments

11 March 2026:

Yes

Agency's Comments

4.2 JUSTIFICATION FOR PROJECT

a) Is there an indication of why the project approach has been selected over other potential options?

b) Does it ensure resilience to future changes in the drivers?

c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?

d) are the relevant stakeholders and their roles adequately described?

Secretariat's Comments

11 March 2026:

Partly. Given that the BNA sites are well known already, please include a table that explains the country-level engagement expected during PPG phase for all existing BNA sites. In this country table, please also include a column that identifies which are GEF-recipient countries.

3/30/2026:

Addressed.

Agency's Comments

CI-GEF 03/26/2026

Table 2: Blue Nature Alliance Phase I Engagement Countries has been added with column to identify GEF recipient countries. Response below with edits made in text under *Beneficiaries, stakeholders, and their roles* to reflect this information.

Further country-level consultation and engagement will occur during the PPG phase and results will be integrated into the final project document. As project geographies are identified, the Alliance will engage government, local stakeholders, and ongoing projects and initiatives in alignment with their anticipated project roles as outlined in Table 1: Beneficiaries, stakeholders, and their roles. Extensive country-level engagement will, further, be completed a part of the engagement framework and/or regional strategy framework development process and, in alignment with first phase of project implementation, a stakeholder engagement plan will be completed with implementing partners for each engagement prior to the start of project activities to ensure appropriate country-level engagement continues throughout project implementation.

Country-level engagement will occur during the PPG phase for all existing Alliance sites, but nature and depth of this engagement will vary by sites based on several factors. As subgrants come to a close for the first phase of project implementation, all grantees will be invited to share their reflections on their partnership with the Alliance, including through a grantee perception survey. The input from this process will serve to inform project development and special consideration will be given to GEF recipient countries to provide opportunity for input from focal points and relevant government ministries engaged in project activities. More extensive consultation and engagement with GEF focal points will occur for the countries with engagements that utilized funds from the GEF Project Grant (noted as ?GEF Funds Allocated? in the table below) to ensure project development is informed by a comprehensive understanding of the impact of and any challenges associated with the utilization of GEF funds in the first phase of project implementation.

Project activities are anticipated to continue in a subset of the countries listed below with reinvestment in select engagements from the first phase of project implementation. These engagements will be identified during the PPG phase and, upon selection, the Alliance and implementing partners will advance country-level engagement to inform and socialize project strategy. With both political will and local engagement as criteria for investment, all engagement and regional strategy frameworks will require stated interest and support by relevant decision-making authorities at the regional, national, sub-national, and community level, including, where possible, expressed commitment to match or co-support the project. Further, for an engagement to advance into implementation, local champions, inclusive of

community organizations, local leaders, and/or coalitions, must be engaged and prepared to support and/or drive the advancing the project process in a participatory way.

5 B. Project Description

5.1 THEORY OF CHANGE

a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?

b) Are the key outputs of each component defined (where possible)?

Secretariat's Comments

11 March 2026:

Yes

Agency's Comments

5.2 INCREMENTAL/ADDITIONAL COST REASONING

Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?

Secretariat's Comments

11 March 2026:

Yes

Agency's Comments

5.3 IMPLEMENTATION FRAMEWORK

a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?

b) Comments to proposed agency execution support (if agency expects to request exception).

c) is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area

d) are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

Secretariat's Comments

11 March 2026:

No.

a) Given that the BNA partnership already exists, please concisely explain the institutional arrangements of the current BNA and any planned revisions under a second phase.

b) The approval of the self-execution in the first phase of BNA does not automatically justify agency self-execution in a second phase. Please follow current GEF guidelines, including it is premature to decide whether the dual execution is appropriate at PIF. Once the Agency has sufficiently progressed in project preparation, and providing that the request is based on one of the five exceptions approved by Council in June 2025, the Agency must follow the procedure depicted in Annex 7 of the Guidelines 2025 to request the exception. In the meantime, the Agency must remove any mention on them playing the dual implementation / execution role.

c) Under cooperation with ongoing initiatives, many of the suggested cooperation is hypothetical. Given BNA already is operational, please revise to describe existing cooperation. Also note some of the identified projects no longer exist, such as Coastal Fisheries Initiative. Further, please identify and explicitly describe the coordination with Enduring Earth and other sustainable financing initiatives.

3/30/2026:

Addressed for PIF stage. Given the very large number of actors working on MPAs, the project will be expected to continue seeking close coordination and cooperation with national, regional, and global stakeholders. Please also be mindful of relevant newly approved GEF projects, such as the Unlocking Blue Pacific Prosperity (UBPP) initiative. By CEO Endorsement, an updated and expanded list of partners will be expected.

4/6/2026:

Per latest guidance, CI cannot be identified as executing partner at PIF. At this early stage it is too premature to decide whether the dual execution is appropriate. Also, the reason presented by the Agency ("CI will act as both the Implementing Agency and Executing Agency under the Blue Nature Alliance, per the previous project") does not fit within the reasons approved by Council in the Policy Amendment document. Once the Agency has sufficiently progressed in project preparation, and providing that the request is based on one of the 5 exceptions approved by Council in June 2025, the Agency must follow the procedure depicted in Annex 7 of the Guidelines 2025 to request the exception. In the meantime, the Agency must remove any mention on them playing the dual implementation / execution role throughout the PIF.

4/6/2026: Addressed

Agency's Comments

CI-GEF April 06, 2026:

We deleted from the PIF document and in the portal sections all mention of CI been the EA for the project. See these changes in sections Institutional Arrangements, Coordination and Cooperation with Ongoing Initiatives and Project and in the General Project information table.

CI-GEF April 1, 2026

Clearance noted at the PIF stage. By CEO Endorsement, an updated and expanded list of partners will be provided.

CI-GEF 03/26/2026

a. Response below with edits made in text under *Institutional Arrangements* to reflect this information.

The Blue Nature Alliance has established a two-tier governance structure with a Steering Council comprised of representatives from the core partners (Conservation International, The Pew Charitable Trusts, the Global Environment Facility, the Rob Walton Foundation, and the Mindereroo Foundation) and an Alliance Core Team (ACT) comprised of senior level staff from the executing core partners (Conservation International, The Pew Charitable Trusts) which are collectively responsible for staffing, the Alliance's management and day-to-day operations, and issuing of sub-grants/contracts.

The ACT creates an annual budget based on the projected workplan for the coming year in which costs are shared on a pro-rate basis by core partners (GEF funds are managed in a segregated bank account and utilized only for expenses and activities allowable by the GEF) with the annual workplan and budget approved by the Steering Council. Based on the approved workplan and budget, consolidated financial reports are prepared for semi-annual Steering Council meetings and an annual technical report is provided at the end of each fiscal year.

The ACT and leadership of the executing core partners are evaluating the current governance and institutional arrangements established during the first phase of the project to identify proposed modifications. While some changes may be useful and/or necessary requirements may come from new core partners interested in joining the Alliance, significant changes to the structure and governance of the Alliance are not anticipated. The intent is to again manage Alliance resources in a pooled fund to be governance by a Steering Council made up of core partners and other major contributors. Execution is anticipated to continue to be led by the two original executing core partners - Conservation International and Pew Charitable Trusts operating in as a single multi-institutional network team. Final governance structure will be discussed and approved by committed core partners.

b. Per GEF Secretariate discussion on Mar. 19, 2026, this comment no longer applies. Conservation International has been listed as the anticipated executing entity under **General Project Information**.

c. Response below with edits made **Table 4: Coordination and cooperation with ongoing GEF funded initiatives and projects** in text under *Coordination and Cooperation with Ongoing Initiatives and Projects* to reflect this information.

The table below identifies a subset of ongoing GEF funded initiatives and projects with which the Alliance has engaged in coordination and cooperation with during the first phase of the project and/or intends to continue or initiative coordination and cooperation during the proposed project. This list is not exhaustive and additional initiatives and projects are anticipated to be identified as project geographies are selected.

In addition to GEF funded projects and initiatives, the project intends to pursue coordination and cooperation with a wide array of implementing, technical, and leverage funding partners. Many, but not all, partnerships developed during the first phase of the project are anticipated to carry over and be further advanced during the proposed project, and additional partnerships will be identified and pursued as relevant during the PPG phase. A list of current Alliance partnerships can be seen below. This list is comprehensive but not

exhaustive as new partnerships continue to be formed throughout project implementation. **See PIF for partner list.**

Aligned with the interest and strategic priorities of the GEF, the project will place particular focus on the continued cultivation of partnerships to advance the sustainable and blended financing of sites. Examples of ongoing partnerships with sustainable financing initiatives include:

- ? McKinsey & Company: The Alliance partners with McKinsey & Company's Nature Analytics Team to provide pro bono support to develop and advance sustainable financing strategies at select sites.
- ? Enduring Earth: The Alliance has partnered with Enduring Earth at several engagement sites, including Canada's Great Bear Sea and Arctic, Colombia, and Gulf of Guinea, to explore and advance long-term financing for ocean conservation areas through the Project Finance for Permanence model.
- ? Oceans 5: The Alliance, in partnership with Niue Ocean Wide and others, coordinated with Oceans 5 to support the development and launch of Niue's Ocean Conservation Commitments, a first-of-its-kind financing mechanism to sustainably manage 100% of Niue's ocean area.
- ? Debt for Nature Coalition: The Alliance, through CI and Pew's status as founding members, engages with the Debt for Nature Coalition to support the broader systematic evaluation on opportunities to use debt-for-nature swap instruments to scale conservation outcomes.
- ? Global Fund for Coral Reefs: The Alliance coordinates with GFCR to advance the development of ocean financing mechanisms in overlapping geographies, including the 2024 Indonesia debt swap, and explore collective strategies to advance ocean financial mechanisms at the global level.
- ? SPACES: The Alliance is exploring opportunities to work with SPACES, aiming to connect select engagement sites with practical support that helps governments at key sites to develop national plans for nature conservation and achieve 30x30 targets.
- Minderoo Foundation's 30x30 Marine Finance: The Alliance is the executing partner of the Minderoo Foundation's \$10M Marine 30x30 Finance Initiative to unlock financing and demonstrate the achievability of 30% protection through three pilot countries.

5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?

b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?

Secretariat's Comments

4 March 2026

Partly. Please consider if Core Indicator 7 on shared marine ecosystems may be appropriate, especially given the regional focus under Component 3.

3/30/2026:

Not addressed. The entry of "1" into CI-7 cannot be located. The Portal version of the PIF still shows CI-7 empty.

4/1/2026:

Addressed

Agency's Comments

CI-GEF April 1, 2026

The target ?1? under CI-7 has been added while keeping in mind that the target under this core indicator may increase during the PPG phase.

CI-GEF 03/26/2026

Response below with edits made in the text under *Core Indicators* and **GEF-8 Results Measurement Framework Worksheet** to reflect this information.

Setting a target for Core Indicator 7: Shared water ecosystems under new or improved cooperative management is appropriate for the project. The Table 4: Core Indicators and Core Indicator Worksheet for the project has been adjusted to reflect a target of one (1) shared water ecosystem under new or improved cooperative management to coincide with Component 3. The target under this Core Indicator may increase during the PPG phase if transboundary/shared water engagement frameworks are developed in LMEs under Component 1.

5.5 NGI Only: Is there a justification of financial structure and use of financial instrument with concessionality levels?

Secretariat's CommentsN/A

Agency's Comments

5.6 RISKS

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?

c) Are environmental and social risks, impacts and management measures adequately screened and rated at this stage and consistent with requirements set out in SD/PL/03?

Secretariat's Comments

4 March 2026

1) The rating under the Environmental and Social risk category (currently low) should be the same as the rating under the key risk table, Environmental and Social Safeguards (ESS) risk, as per the GEF risk appetite GEF/C.66/13.

2) Please provide the rating under ?overall risk rating?.

3/30/2026:

Addressed

Agency's Comments

CI-GEF 03/26/2026

1. The Environmental and Social risk category under **Table 6: Risks to Achieving Outcomes** has been adjusted to moderate to align with the Environmental and Social Safeguards (ESS) risk, as per the GEF risk appetite.
 2. The overall risk rating has been provided.
- 5.7 Qualitative assessment**

- a) Does the project intend to be well integrated, durable, and transformative?
- b) Is there potential for innovation and scaling-up?
- c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's Comments

4 March 2026

Yes

Agency's Comments

6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities

6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?

Secretariat's Comments

4 March 2026

Yes

Agency's Comments

6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors)

Secretariat's Comments

4 March 2026

Yes

Agency's Comments

6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat's Comments

4 March 2026

Yes

Agency's Comments

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

4 March 2026

Yes

Agency's Comments

7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?

Secretariat's Comments

4 March 2026

Partly. It is well noted that agency has provide a list of stakeholders consulted in project design. However, the agency should clarify which specific Indigenous Peoples and local communities have been consulted in project design and elaborate more specifically on plans to engage and consult artisanal fishers, local communities and relevant local fishers associations and community-based organizations in project development.

3/30/2026:

Addressed for PIF stage, noting actions to be taken before CEO Endorsement.

Agency's Comments

CI-GEF 04/01/2026

Clearance noted at the PIF stage.

CI-GEF 03/26/2026

Response below with edits made in the text under *Stakeholder Engagement* to reflect this information.

While the project has not held formal consultations with stakeholders, inclusive of Indigenous Peoples and local community groups, about the project concept (PIF) at this time, feedback received from Indigenous and local community partners throughout implementation of the first phase of the Alliance was utilized to inform the project strategy and proposed processes. This includes feedback from partners pertaining to safeguards and granting processes, partnership approach, and priorities for site-based engagement (e.g. reinvestment to deepen partnerships and support to select sites, increased focus on quality and management effectiveness post-designation). More extensive consultation with Indigenous and local community partners is planned for the PPG phase and results will be integrated into the final project document.

As project geographies are identified, consultations and engagement with relevant Indigenous Peoples and local community groups, inclusive of artisanal fishers, relevant local fishers, and community-based organizations, will be completed as part of the engagement framework and/or regional strategy framework development process and, in alignment with first phase of project implementation, a limited ESIA and safeguard packet (consisting of stakeholder engagement, gender mainstreaming, and grievance redress plans) will be completed for each engagement prior to the start of project activities. Further, when considering project geographies, the Alliance will evaluate all potential site engagements based on criteria which includes political will of decision-making authorities and/or Indigenous groups and the presence of local champions ? inclusive of Indigenous communities, community organizations, local leaders, and/or coalitions ? prepared to work with partners to drive the work forward through engagement with and participation of their local community. In the case of Indigenous-led engagements, the presence of local champions will be considered more important than explicit government support. This criteria ensures that selected engagements have buy-in from local stakeholders, with consultation and engagement of these stakeholders continuing as an integral component of project development and implementation.

8 Annexes

Annex A: Financing Tables

8.1 Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):

STAR allocation?

Secretariat's Comments

N/A

Agency's Comments

Focal Area allocation?

Secretariat's Comments

4 March 2026

Yes

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's CommentsN/A

Agency's Comments

SCCF A (SIDS)?

Secretariat's CommentsN/A

Agency's Comments

SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat's CommentsN/A

Agency's Comments

Focal Area Set Aside?

Secretariat's CommentsN/A

Agency's Comments

8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

4 March 2026

Yes

Agency's Comments

8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat's Comments

4 March 2026

Yes, though the proponents are encouraged to engage in a conversation with existing BNA partners to identify all existing BNA partners that plan to be part of a BNA second phase as part of this PIF's cofinancing by name in the co-financing table.

3/30/2026:

Partly addressed. Assuming "Private Foundation" for \$131.6 million cofinancing means more than one organization, please add an "s" to the title so it reads "Private Foundations"

4/1/2026:

Addressed

Agency's Comments

CI-GEF April 1, 2026

Revised. A note was added in the co-financing section which states *?Prospects being explored include current core partners Minderoo Foundation and the Rob Walton Foundation, private foundations, individuals, governments, and the private sector.?*

CI-GEF 03/26/2026

Discussions are underway with all existing Alliance core partners regarding participation in the second phase of the Alliance, with intent to secure core partner pledges early to leverage additional fundraising opportunities. The PIF co-financing table will continue to be updated as commitments are secured from existing and new core partners.

Annex B: Endorsements

8.4 Has the project been endorsed by the country? (ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?

Secretariat's Comments

4 March 2026

While no LOEs will be required at PIF, per GEF Guidelines, countries identified throughout the preparations phase - including all BNA sites that include GEF recipient countries - are required to secure Letters of Endorsement by CEO Endorsement, at the latest.

3/30/2026:

Acknowledged. Please confirm that it is understood by the Agency that, by CEO Endorsement, the Agency will ensure that the proposed project is in compliance with all GEF policies, including securing OFP LOEs for all countries where GEF-financed activities have been identified. Please reply with confirmation that this will be achieved.

4/1/2026:

Addressed

Agency's Comments

CI-GEF April 1, 2026

We confirm that this will be achieved by CEO Endorsement in compliance with the GEF Policy. Specifically, LOEs will be secured for all countries where GEF investment will be used.

CI-GEF 03/26/2026

Response below with edits made in the text under **ANNEX B: ENDORSEMENTS** to reflect this information.

The project will strive to secure relevant Letters of Endorsement prior to CEO endorsement for all GEF recipient countries where engagement sites are identified during the PPG phase with intent to utilize funds from the GEF Project Grant.

While the project intends to identify most engagement sites, especially under Component 1 with likely reinvestment in the current site portfolio, during the PPG phase, the project intends to maintain the current governance arrangement which allows for sites to be scoped and approved on a rolling basis during project implementation and added as new project geographies with approval of the engagement framework by the Blue Nature Alliance Steering Council. Once identified and approved by the Steering Council, the Alliance will require a Letter of Endorsement from the relevant GEF focal point for engagement sites where GEF funds will be allocated.

Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?

Secretariat's Comments

4 March 2026

While no LOEs will be required at PIF, per GEF Guidelines, countries identified throughout the preparations phase - including all BNA sites that include GEF recipient countries - are required to secure Letters of Endorsement by CEO Endorsement, at the latest.

Agency's Comments

CI-GEF 03/26/2026

See above.

Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?

Secretariat's Comments

4 March 2026

While no LOEs will be required at PIF, per GEF Guidelines, countries identified throughout the preparations phase - including all BNA sites that include GEF recipient countries - are required to secure Letters of Endorsement by CEO Endorsement, at the latest.

Agency's Comments
CI-GEF 03/26/2026

See above.

8.5 For NCI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?

Secretariat's Comments N/A

Agency's Comments
Annex C: Project Location

8.6 Is there preliminary georeferenced information and a map of the project's intended location?

Secretariat's Comments

4 March 2026

Yes. But please include an additional column to the table that identifies the country.

Agency's Comments
CI-GEF 03/26/2026

Column has been added to **Table 9: Geo-Location Information ? Blue Nature Alliance Phase I Site Portfolio.**

Annex D: Safeguards Screen and Rating

8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?

Secretariat's Comments

4 March 2026

Partly. We note that CI attached ENVIRONMENTAL AND SOCIAL SAFEGUARDS (ESS) SCREENING REPORT, and an overall ESS risk is classified as Moderate. For improving the effectiveness and durability of existing ocean conservation areas, it is critical to have strong engagement with Indigenous Peoples and local communities.

1) Please clarify whether the project consulted with Indigenous Peoples and local communities? groups about the project concept (PIF) and how the results of consultations were integrated into project concept (PIF).

2) Please ensure recognizing local vulnerable communities (including artisanal fisheries and informal fisher folks) and Indigenous Peoples and local communities not only as beneficiaries, but also as partners in the project governance including the project steering committee.

3) Please consider integrate Indigenous Peoples governance, traditional and local knowledge, and capacity building as a part of project activities where relevant, particularly in Component 1 and 3.

4) Please also consider including integration of vulnerable communities and Indigenous Peoples governance, traditional and local knowledge, capacity building, and number of Indigenous Peoples beneficiaries as monitoring indicators where appropriate during PPG.

5) Both ENVIRONMENTAL AND SOCIAL SAFEGUARDS (ESS) SCREENING REPORT and Environmental and Social Safeguards in D. Policy requirements (PIF page 45) said Moderate risk. However, the environmental and social risk in the Key Risks table (PIF page 38) is Low. Please make these consistent with ENVIRONMENTAL AND SOCIAL SAFEGUARDS (ESS) SCREENING REPORT.

3/30/2026:

Addressed for PIF stage

Agency's Comments **CI-GEF 03/26/2026**

1. Response below with edits made in the text under *Stakeholder Engagement* to reflect this information.

The project has not held direct consultations with Indigenous Peoples and local community groups about the project concept (PIF) at this time. However, feedback received from Indigenous and local community partners throughout implementation of the first phase of the Alliance was utilized to inform the project strategy and proposed processes. This includes feedback from partners pertaining to safeguards and granting processes, partnership approach, and priorities for site-based engagement (e.g. reinvestment to deepen partnerships and support to select sites, increased focus on quality and management effectiveness post-designation). More extensive consultation with Indigenous and local community partners is planned for the PPG phase and results will be integrated into the full project concept and final Project Document.

As project geographies are identified, consultations and engagement with relevant Indigenous Peoples and local community groups will be completed as part of the engagement framework and/or regional strategy framework development process and, in alignment with first phase of project implementation, a limited ESIA and safeguard packet (consisting of stakeholder engagement, gender mainstreaming, and grievance redress plans) will be completed for each engagement prior to the start of project activities.

2. Response below with edits made in the text under *Stakeholder Engagement* to reflect this information.

When identifying project geographies, the Alliance will evaluate all potential sites based on criteria which includes political will of decision-making authorities and/or Indigenous groups and the presence of local champions ? inclusive of Indigenous communities, community

organizations, local leaders, and/or coalitions ? prepared to work with partners to drive the work forward through engagement with and participation of their local community. This criteria ensures that selected engagements have buy-in from local stakeholders, with consultation and engagement of these stakeholders continuing into project governance and, in the case of Indigenous-led engagements, the presence of local champions will be considered more important than explicit government support.

Where feasible, local community-based organizations, coalitions, and/or Indigenous groups will be selected as implementing partners and, when beneficial, engagements will include activities to support the institutional capacity building of these partners. Examples of engagements from the first phase of project implementation led by local community-based organizations, coalitions, and/or Indigenous groups include:

? Canada?s Great Bear Sea led by Coast Funds, the world?s first Indigenous-led conservation finance organization, and Coastal First Nations.

? Chile?s offshore large-scale marine protected areas advanced through partnership with the Rapa Nui Local Sea Council and Organizaci?n Funcional Comunitaria Mar de Juan Fernandez.

? Gulf of Guinea advanced through partnership with WCS and community fishing cooperatives.

? Mariana Islands led by the Northern Marianas College Natural Resources Management Program to integrate Indigenous and traditional ecological knowledge into marine management.

? Mexico?s Dos Mares Biosphere Reserve advanced through partnership with DEPESCA, a local artisanal fishing association.

? New Caledonia?s Natural Park of the Coral Sea advanced through partnerships with the Customary Senate of New Caledonia and the Kanak Customary Authorities College of the PNMC.

? Western Indian Ocean led by the Western Indian Ocean Marine Science Association with activities to establish and secure legal recognition for community-based and locally managed marine areas.

As project geographies are identified, consultations and engagement with relevant Indigenous Peoples and local vulnerable community communities, inclusive of artisanal fisheries and informal fisherfolk, will be completed as part of the engagement framework and/or regional strategy framework development process, ensuring the perspectives and interests of these groups are incorporated into project design. Further, a limited ESIA and safeguard packet (consisting of stakeholder engagement, gender mainstreaming, and grievance redress plans) will be completed for each engagement prior to the start of project activities and will ensure these groups remain active and engaged in project governance throughout implementation.

3. Response below with edits made in the text under *Stakeholder Engagement* to reflect this information.

As noted in the previous response, where feasible, local community-based organizations, coalitions, and/or Indigenous groups will be selected as implementing partners and, when beneficial, engagements will include activities to support the institutional capacity building of these partners. Across these engagements, as well as others where Indigenous groups are partners and/or stakeholders participate in activities, the project seeks to integrate activities pertaining to Indigenous Peoples governance, traditional and local knowledge, and capacity building into project interventions and learning. Project activities which integrate Indigenous Peoples are guided by and adhere to the social principles described in the Blue Nature Alliance?s Code of Conduct.

Further, the Alliance, through its global enabling conditions workstream, works to elevate Indigenous Peoples governance, traditional and local knowledge, and access to capacity building resources on a global scale. Examples of this include a focus on empowering local and Indigenous rights and practices in the scaling of marine management capacity, partnering

to share experience incorporating Indigenous knowledge in protected area design and management, supporting partners (e.g. Polynesian Voyaging Society) to preserve and perpetuate traditional practices, and advancing research and education opportunities pertaining to the human dimensions of ocean conservation.

This focus will carry over into the proposed project and activities will continue to engage with and include leadership from Indigenous peoples, with consideration given to opportunities to integrate Indigenous Peoples governance, traditional and local knowledge, and capacity building into project interventions and learning.

4. Response below with edits made in the text under *Stakeholder Engagement* to reflect this information.

Integration of monitoring indicators for integration of vulnerable communities and Indigenous peoples governance, traditional knowledge, capacity building, and number of Indigenous Peoples beneficiaries will be considered during PPG, including monitoring of engagement with and participation of these groups in project development. Further, site-based engagement specific monitoring indicators will be considered and adopted where appropriate through the completion of the limited ESIA and safeguard packet, consisting of stakeholder engagement, gender mainstreaming, and grievance redress plans. In cases where Indigenous Peoples are present in the project area and risks are assessed as high with potential for negative impacts through the limited ESIA and safeguard screening form, a dedicated Indigenous Peoples plan and associated monitoring indicators will be developed for the site-based engagement.

The Environmental and Social risk category under **Table 6: Risks to Achieving Outcomes** has been adjusted to medium to align with the Environmental and Social Safeguards (ESS) risk, as per the GEF risk appetite.

Annex E: Rio Markers

8.8 Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?

Secretariat's Comments

4 March 2026

Yes.

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments

4 March 2026

Yes.

Agency's Comments

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments N/A

Agency's Comments

9 GEFSEC Decision

9.1 Is the PIF and PPG (if requested) recommended for technical clearance?

Secretariat's Comments

3 March 2026: As discussed, please resubmit the project for the correct amount now that the funds are available.

11 March 2026: Please address the above and resubmit.

30 March 2026: Please address the above and resubmit.

4/6/2026: Please address the above and resubmit.

4/6/2026:

Agency's Comments

9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval

Secretariat's Comments

1) Per GEF policy, the Agency must provide OFP Letters of Endorsement by CEO Endorsement for all GEF-recipient countries where GEF-financed activities have been identified by the proposed project.

2) By CEO Endorsement, please identify the region(s) targeted by Component 3, including documentation that the necessary level of stakeholder engagement has been achieved to ensure the project investments are complementary to existing and planned efforts in the respective region(s).

3) In the development of the Gender Action Plan, please ensure that the GAP aligns with the project components. Please ensure that in the development of the results framework, gender-specific indicators are included to facilitate monitoring and reporting. Please indicate measures to facilitate and support the implementation of the GAP (e.g., budgets, regular monitoring, adaptive management, etc.). Please make a reference to include in PIRs, MTRs and TE, reports on gender-specific results, including the implementation of the Gender Action Plan.

4) Please consider including integration of vulnerable communities and Indigenous Peoples governance, traditional and local knowledge, capacity building, and number of Indigenous Peoples beneficiaries as monitoring indicators where appropriate during PPG.

5) Given the very large number of actors working on MPAs, the project will be expected to continue seeking close coordination and cooperation with national, regional, and global stakeholders. Please also be mindful of relevant newly approved GEF projects, such as the Unlocking Blue Pacific Prosperity (UBPP) initiative. By CEO Endorsement, an updated and expanded list of partners will be expected.

6) Only during PPG and once project has sufficiently progressed in preparation can CI propose a request the exception for dual-execution based on one of the five exceptions approved by Council in June 2025 following the procedure depicted in Annex 7 of the Guidelines 2025.

Agency's Comments

CI-GEF April 1, 2026

Noted.

CI-GEF 03/26/2026

Noted.

Review Dates

	PIF Review	Agency Response
First Review	3/11/2026	3/26/2026
Additional Review (as necessary)	3/30/2026	4/1/2026
Additional Review (as necessary)	4/1/2026	4/6/2026
Additional Review (as necessary)	4/6/2026	