

Ecosystem restoration in seven national protected areas of Argentina

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID	11490
Countries	Argentina
Project Name	Ecosystem restoration in seven national protected areas of Argentina
Agencies	CAF
Date received by PM	9/20/2025
Review completed by PM	
Program Manager	Sarah Wyatt
Focal Area	Biodiversity
Project Type	FSP

PIF

CEO

Part I - General Project Information

1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

N/A

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

Secretariat comment at CEO Endorsement Request

12/16/2025

Yes.

11/17/2025

No, please revise as climate change adaptation is minor in this project and so should be zero. Please review guidance on applying the Rio Markers for OECD.

Also, does CAF produce a ProDoc or something else for internal use that would provide more information?

Agency Response

12/10/2025

Agreed and changed, Climate Change adaptation is now zero

Yes, we have uploaded the PRODOC

2. Project Summary.

a) 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 outcomes?

b) Does the summary capture the essence of the project and is it within the max. of 250 words?

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

N/A

3. Project Description Overview

- a) Is the project objective statement concise, clear and measurable?
- 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?
- c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
- d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
- e) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

12/16/2025

Yes, thank you.

11/17/2025

No. Please address the following.

b.

1.1.5 - This language in English is unclear.

Agency Response

12/10/2025

Changed to "Interjurisdictional coordination processes established in each of the seven protected areas" throughout the document

4. Project Outline

A. Project Rationale

- a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?
- b) Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?
- c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?

Secretariat comment at CEO Endorsement Request

12/16/2025

Yes. Thank you for this key information for understanding the approach.

11/17/2025

No.

a.

- Please provide information about the biodiversity values of the targeted areas. Are they KBAs, Ramsar, etc sites? What species driving the restoration effort? Why were they selected?

- Please also provide more information about the targeted invasive species, problems they are causing, threatened species they are impacting, and the types of strategies that will be implemented. Are any plants included?

b. We would expect Indigenous organizations to be involved at levels above the municipal/local. Please include them and their role.

Agency Response

12/10/2025

a) Table 1 and the following text was added to paragraph 11: "Seven PAs of the 52 terrestrial PAs within the SNAP have been selected for targeted intervention. Together, they represent approximately 20% of the system's total area. The targeted territory comprises areas that are Key Biodiversity Areas (KBA), Ramsar sites, or hold other international recognitions for their biological importance. The seven PAs and their BAs contain 4 Ramsar Sites (in L. de los Pozuelos NM, Iber? NP, Campos del Tuyu NP, and Tierra del Fuego NP), 17 KBAs, one World Natural Heritage Site (Los Glaciares NP), and one Core Area of a MAB Biosphere Reserve (Laguna de los Pozuelos NM)." Table 1 shows the types of degraded ecosystems or affected species, selected to be restored by Protected Area, as well as the main types of degradation operating in each one.

The following text was added under paragraph 21: "The list of invasive species targeted in this project includes one deer (the axis deer), four feral livestock species (wild cattle, wild horses, wild buffaloes, and wild pigs/boars), and one plant species (*Asparagus asparagoides*). Table 1 provides further information about which native species or ecosystems are degraded by the impacts of different types of drivers, and how. The impacts of the IAS are diverse, being the main ones documented in the focal PAs:

Disruption of natural regeneration of vegetation (including arboreal species)
Changes in plant community composition
Soil erosion, compaction, and changes in microtopography.
Spatial displaced of native fauna
Reduced food resources for native fauna."

Table 1 was added (see CER document). Further information on IAS is also included in the ProDoc (attached).

b) Indigenous peoples will participate in consultations involved in the development of the guidelines and program under component 1 and will play a key role in the exchange of experiences in component 3. Information was added to CER and plans

5 B. Project Description

5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?

b) 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?

c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?

d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

- e) **Other Benefits:** Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?
- f) **Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?**
- g) **How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?**
- h) **Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?**
- i) **Gender:** Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?
- j) **Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?**
- k) **Policy Coherence:** Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?
- l) **Transformation and/or innovation:** Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

3/13/2026

Yes.

1/22/2026

No.

c. Restoration - The specific biodiversity values sought through the restoration actions proposed still are not clear. The text mentions eroding ecosystem service values but that is not the goal of the GEF. We are looking for the impact on biodiversity of global significance.

Invasive species - It seems like there is some confusion of terms and approaches to invasive species from a GEF perspective based on our experience and seeking durable results.

Eradication justification - As outlined in the GEF-8 and previous programming directions, the GEF has specific requirements to fund eradication projects. Eradication means the complete elimination of the species in the target area. For each species and location identified there needs to be: specific conservation goals, such as reduced threat to a globally threatened species (e.g. feral cats and Critically Endangered songbirds); a high likelihood of success (complete eradication); low likelihood of reintroduction; and a reasonable cost approach. While it may seem like semantics, perhaps elimination could be used. Admittedly, large-bodied animals may be easier than some of the other eradications we have supported so it might be more appropriate to use different language.

In the case of the plant, is eradication truly possible as it is often not with plants? Precision in the language is important for this topic to ensure alignment with GEF approaches.

The GEF does also support the development of IAS management plans and approaches which may be the better fit for some of the activities described. We very much welcome the creation of value chains, but caution that it can be that value chains actually encourage the spread of a species when there is a market that drives it.

Humane treatment of animals - Please commit to good practices in terms of humane treatment for animals that will be killed as part of this project. We ask that the expenses directly related to killing come from co-financing.

Behavior change - There may have been some misunderstanding about what was meant by a "behavior change approach" which was not meant to be a specific approach. Awareness raising as described here is meant to cause behavior change. Therefore, during inception we would like to see resources provided to undertake specific theory of change exercises for each of the biggest challenges faced by each park to carefully consider what might be unintended consequences or gaps in the approach. Engaging communications professionals with experience in behavior change and providing sufficient for message testing and other approaches could also help address this.

11/17/2025

No, please address the following.

c.

Restoration justification - Undertaking restoration for biodiversity goals (in comparison to agriculture) requires significant long-term investment. There needs to be a strong justification of specific biodiversity benefits for GEF resources to be invested. Please provide this information.

Invasive species

- The GEF has a specific approach to invasive species that is outlined in the programming directions. We encourage you to carefully read that text and ensure alignment.

- The approach is about prevention and policy first. There seems to be no discussion of preventing future invasions, which means that there will just be a continual need to chase after different invaders. Please include this.

- Management - We note that massive amounts of money can and are spent managing invasive species with a need to continually spend. In the case of the GEF, limited strategic resources can be invested for the design and creation of IAS management programs. However, implementation (which is often essentially a jobs program) needs to be supported by the government or another partner. It is also important to have clear information about how these activities will continue past the life of the project.

- Hunting/collection - What is the plan to get rid of the feral livestock?

- Definition - As described, it does not appear that feral livestock is an invasive species. Please be clear in the language (such as on page 8 when they are included as invasive species).

- Behavior change - Given the problems outlined, the problem appears to really be a matter of human behavior for livestock management. How will this project take a behavior change approach? How will the project test hypotheses and refine the approach during the life of the project? We strongly encourage project proponents to look to the behavior change specific approaches to theory of change for conservation promoted by Foundat

Component 1

Page 15 top - The use of the word 'contemplate' makes it sound like the project will consider but not necessarily implement a participatory approach. Please clarify.

1.1.3 - It would be preferable for the project to take a holistic approach to developing financial mechanisms that can serve the entire park system rather than working to manage them park by park.

i)

1. Gender equality considerations are not adequately reflected/integrated in the project document and the project results framework. The attached gender action plan's included some specific actions, indicators and recommendations to advance gender equality. These should be integrated into the project document, as per GEF's requirement, and not confined as a stand-alone document.

- Agency is requested to reflect the actions, indicators and recommendations into the project document description, including in the project description overview and in the results framework, with gender-specific indicators.

- Please also include lessons learned and best practices in addressing gender inequalities and promoting women's empowerment in knowledge products produced and in reporting in PIRs, MTR and TE.

- Please complete the responses to section C. Policy Requirements. Yes and No responses only. Don't leave blank.

- Please respond to all the questions here - **Generating socio-economic benefits for women (Yes or No)**

Agency Response

02/25/2026

- Restoration

The biodiversity values the project aims to restore/conserves are the conservation values of each protected area, described in updated Table 1. "Types of degraded ecosystems or affected species selected to be restored by Protected Area; main types of degradation operating in each one, and actions that will be financed by the project." The project aims to contribute to the following GEF goals: Land & Ocean Protection (8 million hectares of marine protected areas created or under improved management, and 6 million hectares of degraded land restored, as well as Climate Mitigation: Mitigating the equivalent of 1.5 billion tonnes of CO₂, through the following indicators: GEF Core Indicator 1: Terrestrial protected areas created or under improved management, GEF Core Indicator 3: Area of land and ecosystems under restoration, and GEF Core Indicator 6: Greenhouse gas emissions mitigated. More information of the specific actions the project will implement under Component 2 is provided in Table 1 of the CER, as well as in Section C1 of the ProDoc.

Table 1. Types of degraded ecosystems or affected species selected to be restored by Protected Area; main types of degradation operating in each one, and actions that will be financed by the project.

Protected Area	Specific biodiversity values to be restored	Type of degradation	Actions financed by the project
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<p>Los Cardones NP:</p> <p>Driver/s of degradation: Domestic livestock</p>	<p>a) 64 ha of High Andean wetlands (<i>vegas</i>)</p> <p>b) 500 ha of Native Andean Shrublands and grasslands</p> <p>c) 500 ha of <i>Prosopis ferox</i> (Churqui) forest</p> <p>d) 1000 ha of <i>Trichocereus atacamensis</i> (<i>Cardonal</i>)</p>	<p>(a) and (b): changes in natural plant communities, competition with native herbivores, and soil erosion by overgrazing by small livestock (goats and sheep) and large livestock (cattle).</p> <p>(c) and (d): reduced underground water availability produced by disturbances in upstream wetlands in (a) affects mortality rates and recruitment.</p>	<p>Monitoring and Evaluation of the recovery of degraded areas</p> <p>Design and implementation of livestock management plans.</p> <p>Removal of domestic livestock from PA.</p> <p>Active vegetation cover restoration actions in highland wetland sectors</p> <p>Support for the implementation of the project to restore the structure and functionality of the Malcante Andean highland wetland</p>
<p>Iber? NP:</p> <p>Driver/s of degradation: IAS: - Feral pig (<i>Sus scrofa</i>) - Axis deer (<i>Axis axis</i>) - Feral cattle (<i>Bos taurus</i>) - Feral buffalo (<i>Bubalus arnee bubalis</i>)</p> <p>Domestic livestock</p> <p>Wildfires</p>	<p>a) 6700 ha of Hygrophilous and (b) Xerophilous forest</p> <p>c) 6800 ha of Grasslands and (d) Wetlands</p>	<p>For (a), (b), (c) and (d): Altered forest regeneration processes by high density of IAS (mammals)</p> <p>Reduced food resources for native fauna due to high density of IAS (mammals)</p> <p>High fauna mortality rates (in all ecosystem types) and high mortality of trees in xerophilous forests, due to recurrent large-scale and intense wildfires.</p>	<p>Monitoring and Evaluation of the recovery of degraded areas</p> <p>Implementation of the IAS control Plan (in preparation by the PA)</p> <p>Removal of IAS (automatic cages and baits, watchtowers)</p> <p>Design and implementation of livestock management plans.</p> <p>Update and implementation of the Fire Management Plan</p>

<p>Campos del Tuy? NP:</p> <p>Driver/s of degradation: IAS: - Feral pig (<i>Sus scrofa</i>) - Axis deer (<i>Axis axis</i>) - Bridal creeper (<i>Asparagus asparagoides</i>)</p> <p>Domestic livestock (in BA)</p> <p>Wildfires</p>	<p>a) Approx. 50 individuals of Pampas Deer (<i>Ozotoceros bezoarticus</i>) (NT ? IUCN Red List)</p> <p>b) 3050 ha of Grasslands</p> <p>c) 100 ha of <i>Celtis tala</i> forest</p>	<p>Reduced food resources for native fauna due to high density of IAS (mammals)</p> <p>(c) High density of IAS (climbing shrubs) produces tala tree mortality, reducing the extension of tala forests.</p> <p>Natural grass availability for native fauna strongly reduced by overgrazing domestic livestock.</p> <p>High fauna mortality rates (in all ecosystem types) and high mortality of trees in xerophilous forests, due to recurrent large-scale and intense wildfires</p>	<p>Monitoring and Evaluation of the recovery of degraded areas</p> <p>Design and implementation of the IAS control plan</p> <p>Removal of IAS (materials for building corral traps)</p> <p>Implementation of a collaborative livestock management plan</p> <p>Background: Ecological Restoration Program of the Campos del Tuy? National Park</p>
<p>Lihu? Calel NP:</p> <p>Driver/s of degradation: Wildfires</p>	<p>a) 5537 ha of <i>Prosopis caldenia</i> forest</p> <p>b) Native fauna species (guanaco, gray fox, puma, and Patagonian mara)</p>	<p>High fauna mortality rates (in all ecosystem types) and high mortality of trees in xerophilous forests, due to recurrent large-scale and intense wildfires</p>	<p>Updating and implementation of the Fire Management Plan</p>
<p>Los Glaciares NP:</p> <p>Driver/s of degradation: IAS: - Feral cattle (<i>Bos taurus</i>) - Feral horses (<i>Equus ferus caballus</i>)</p> <p>Domestic livestock</p>	<p>a) 13049 ha of Andean-Patagonian (Magellanic) forest</p> <p>b) Aprox. 35/40 individuals of Patagonian huemul (<i>Hippocamelus bisulcus</i>) (EN ? IUCN Red List)</p> <p>c) 7900 ha of Bottom Valley Grasslands</p>	<p>Trampling and browsing by large exotic ungulates produces:</p> <p>Disruption of natural regeneration of vegetation (incl. trees)</p> <p>Changes in plant community composition</p> <p>Soil erosion, compaction, changes in microtopography.</p>	<p>Monitoring and Evaluation of the recovery of degraded areas</p> <p>Elimination of IAS</p> <p>Support for the implementation of the Ecological Recovery Project of the environments affected by the invasion of wild cattle in Los Glaciares National Park 2023 - 2033</p> <p>Design and implementation of the Livestock Management Plan.</p>

<p>Tierra del Fuego NP:</p> <p>Driver/s of degradation: IAS: - Feral horse (<i>Equus ferus caballus</i>) - Domestic livestock</p>	<p>a) 3500 ha of <i>Nothofagus</i> forest</p> <p>b) 160 ha of Wetlands (<i>Sphagnum</i> peat bogs)</p>	<p>Trampling and browsing by large exotic ungulates produces:</p> <p>Disruption of natural regeneration of vegetation (incl. trees) Changes in plant community composition Soil erosion, compaction, changes in microtopography.</p>	<p>Monitoring and Evaluation of the recovery of degraded areas Design and implementation of the IAS control plan Background: Technical Assistance to the National Parks Administration for the Removal of Invasive Horses from the Tierra del Fuego National Park</p>
<p>Laguna de los Pozuelos NM:</p> <p>Driver/s of degradation: Domestic livestock</p>	<p>a) 589 ha of High-Andean wetlands (<i>vegas</i>)</p> <p>b) Central lagoon (habitat for migratory and resident water bird species)</p>		<p>Monitoring and Evaluation of the recovery of degraded areas Design and implementation of livestock management plans.</p>

•Invasive species

The words "eradicate" and "eradication" were replaced with "eliminate" and "elimination" in line 34, line 65, table 4 (target 6). Please refer to the newly uploaded document titled: [REVISED2 document_GEF-8 FSP CEO Endorsement Restoration APN](#). The project includes the design and implementation of management plans. It does not foresee creating value chains for the meat derived from the elimination of invasive species; the focus is on management plans and implementation of control and elimination measures. We only mention value chains in our response to the initial comments made by the Reviewer dated 11/17/2025 that it is something that is occurring near some of the protected areas. We provide links to the following documents that are mentioned in the ProDoc: the [Strategic Guidelines for the Management of Exotic Species in the National Parks Administration \(APN\) of 2007](#), and the [Exotic Plant Prioritization System ? Species and Populations ? in Protected Areas of the National Parks Administration of 2018](#)

•Humane treatment of animals

The following text was added to line 35 of the CER, and section III.C. of the ProDoc: "The National Parks Administration (APN) commits to applying good practices and ensuring the humane treatment of animals, both within the framework of this Project and beyond. To ensure animal welfare, the regulations established by the World Organisation for Animal Health (WOAH) through its Terrestrial Animal Health Code (2021, available at: <https://www.oie.int>) will be followed. This Code sets internationally recognized guidelines for the humane treatment of animals during handling, capture, and slaughter."

The following text was added in line 118 of the CER and section III.D. of the ProDoc: "In line with donor guidance, all expenditures directly associated with lethal-control actions (e.g., dispatch ammunition, specialized dispatch equipment, third-party services specifically for dispatch) will be covered through co-financing, not from donor funds."

Additional context: At present, the institution is implementing various animal invasive alien species control projects across protected areas within the national system. As a result of these

experiences, the protected areas have developed protocols and good practice procedures for the humane treatment of species subject to control. For example, Los Glaciares National Park has developed a protocol for the humane elimination of feral horses (baguales) ([IF-2026-12073226-APN-PNG#APNAC](#)), prepared by the park's ranger corps. This protocol establishes technical, operational, and ethical guidelines for the elimination of feral animals, with the primary objective of minimizing animal suffering, applying internationally accepted animal welfare standards in population control contexts, and reducing negative impacts on ecosystems and native fauna. The protocol defines elimination actions based on the following principles, aligned with international recommendations on animal welfare in wildlife management. These include: i) minimization of suffering: prioritizing methods that produce immediate or near-immediate loss of consciousness; ii) rapid intervention: avoiding any unnecessary prolongation of the process; iii) selectivity and control: actions are carried out exclusively on target individuals, minimizing stress associated with prolonged pursuit; iv) proportionality: applying the most effective and least invasive method available for the operational context; and v) professionalism: all interventions are conducted by trained and authorized personnel. Additional protocols have been developed under wild boar (*Sus scrofa*) control projects in national protected areas, such as El Palmar National Park ([IF-2022-52055224-APN-PNEP#APNAC](#)). These protocols include restrictions and equipment requirements for animal elimination, including: i) the prohibition of the use of handguns to dispatch captured animals, specifying instead the use of shotguns (12-, 16-, and 20-gauge UAB) or rifles of specific calibers for this purpose. Hunters are required to notify by radio before leaving the blind to dispatch a wounded animal; ii) the mandatory use of semi-jacketed, soft-point, hollow-point, or other expanding projectiles designed to deform upon impact. This type of ammunition is intended to transfer energy more efficiently and ensure the rapid dispatch of the animal; iii) recommended impact zones: the protocol stipulates that, whenever possible, shots should be directed at the head, the base of the neck, or the heart?areas considered critical to achieving instantaneous or near-instantaneous death

•Behavior change

The following text was added to line 70 of the CER and section III.C. of the ProDoc : ?The Project will allocate funds to the development of a communication and awareness?raising strategy with a behavior change focus. The strategy will be grounded in an initial Knowledge, Attitudes, and Practices (KAP) assessment conducted across the seven protected areas. This approach will enable audience segmentation and the tailoring of messages and communication channels to the diverse socio?territorial contexts of the selected protected areas. The strategy will be implemented on the ground by communication and environmental education agents from each protected area through an integrated approach that combines awareness?raising, capacity building, systematization, and the exchange of experiences, while promoting the active engagement of women, youth, Indigenous communities, and other community stakeholders. To ensure effectiveness and enable adjustments to the strategy, the Project will finance an external audit service. This process will not only assess media reach but will also include post?intervention perception studies to measure actual behavioral changes among specific target groups. The audit results will allow for the dynamic adjustment of the strategy and will guide behavior change communication actions in specific groups and locations

12/10/2025

a) NA

b) NA

c) For APN, the invasion of invasive alien species, inadequate livestock management practices, and high-intensity, recurrent fires represent critical threats that undermine the conservation of the natural and cultural values of protected areas. Currently, APN allocates financial, human, and material resources to implement prevention, management, and control actions aimed at restoring ecosystems and reducing biodiversity loss. To ensure sustainability, the project will promote the

creation of a Restoration Program within the National Directorate of Conservation of APN and will develop guidelines for the diagnosis, planning, and monitoring of restoration processes in national protected areas. This conceptual, strategic, and methodological framework will standardize and optimize procedures, ensuring more efficient and effective management throughout the SNAP.

In the long-term, large-scale implementation and maintenance of restoration and invasive species control actions will be financed by APN's regular budget and other public resources, such as subnational governments, other national and international donors & investors. During the elaboration of the financial mechanism that will underpin this Program, the use of existing and prospective resources available for invasive species management will be explicitly analyzed and incorporated, so that the program rests on a realistic, multi-source financing strategy. The counterpart resources provided by CAF in the form of technical cooperation will be used to strengthen APN's institutional, technical, and financial capacities at the national scale, while the seven pilot initiatives in the selected parks are developed, monitored, and prepared for replication across the SNAP.

The following text was added to paragraph 33: "The actions are integrated into the management plans of protected areas as strategic projects and programs with a time horizon of 6 to 10 years. However, APN lacks a comprehensive strategy to integrate ecosystem restoration actions across the entire National System of Protected Areas (SNAP). As a result, efforts to prevent and mitigate threats are carried out in a fragmentary manner, with limited coordination between initiatives and no effective mechanisms for sharing lessons learned among protected areas. This project seeks to reverse that situation through the implementation of seven demonstration cases that will address the main causes of ecosystem degradation and biodiversity loss. These lines of action, identified as priorities for tackling threats that hinder restoration processes, are included in the management plans of the seven selected protected areas and form the basis for generating solutions that are replicable and scalable across the system. In parallel, the counterpart resources provided by CAF in the form of technical cooperation will be used to strengthen APN and its restoration and invasive species management capacities at the national scale, while these pilots are developed and prepared for replication. To strengthen these processes, strategic investments will support the implementation of the demonstration cases, complemented by communication campaigns targeting key stakeholders in the territory. In addition, participatory spaces will be promoted at local and interjurisdictional levels to coordinate actions at municipal, provincial, and national scales, optimizing the efforts of APN toward effective and coordinated management of protected areas. The knowledge generated during project implementation will serve as the foundation for designing an institutional policy on ecological restoration in protected areas. The dissemination of lessons learned and the training of APN personnel will enable these experiences to be scaled up across the entire SNAP, consolidating an integrated and sustainable approach to ecosystem recovery.

The following text was added under paragraph 34: "The eradication or population containment of IAS is an indispensable component for advancing the restoration of target ecosystems or populations in the project. Even when the goal is to keep IAS populations below a threshold ? since it is not feasible to work towards a complete eradication goal in the project timeframe ? the results are critical to stop and bend the declining curve of species and ecosystems of high conservation value, as are Pampas Deer, Patagonic Huemul, Andean highland wetlands, or Neltuma caldenia forests. Out of the five animal IAS targeted by the project, four are feral forms of domestic species (swine, cattle, horses, and buffaloes). The fifth is an Asian deer, the axis. APN has a long-standing policy of eradicating feral animals from PAs, and through this project is seeking to firmly advance in this direction. APN has an active policy of prevention, early detection, and response against new IAS. This strategy is currently in place, and the project has included it as part of the entire IAS approach. However, PAs must deal with IAS that are currently present. In the Results Framework, the project commits to the implementation of four IAS Management Plans, for the following parks: Iber?, Campos del Tuy?, Los Glaciares, and Tierra del Fuego. These Plans are directed not only at control and eradication, but also to avoid future re-

invasions. Additionally, the project will work on inter-institutional coordination processes and local advisory committees to create governance conditions aimed at sustaining policies, programs, and practices. In places where it is feasible, fences (permanent or temporary) are to be installed to avoid reinvasions. Community awareness work will gain people's support to maintain areas free of the targeted IAS. Below, the particular context and situation of each park is explained. In all the PAs selected for addressing IAS, the goal is to eradicate feral cattle, horses and buffaloes from the sectors of the parks presented to this project (intervention polygons).

Ibera NP: Eradication is the aim for feral buffaloes and feral cattle; chances of reinvasion by these two invaders are very low, because they are not present in the landscape. Wild pigs and axis deer are densely present in the landscape where the park is located, and only maintaining low population densities within the park is foreseen. This is the only case in the project where coexistence with IAS is the expected result.

Campos del Tuyú NP: Both IAS, wild pigs and axis deer, are present in low densities within the park. However, from a landscape perspective, their density is higher outside than inside the park. The project's approach to IAS is at landscape level, where park and neighbors, as well as interjurisdictional efforts, are deployed to prevent the ingress (but exceptional) of IAS inside the park's limits. As is the case in Ibera, the Campos del Tuyú NP requires long-term vigilance and control over these threats. The one plant invader included in the plan has also been targeted for eradication.

Los Glaciares NP: Populations of feral cattle and horses are distributed across the park, but aggregated in seven groups, isolated by geographic barriers. Eradication is the final goal. During this project two of these areas will be intervened: one will be freed of feral livestock; the other will have substantially reduced feral animal numbers (the work is to be concluded post-project). As mentioned, reinvasion has very low chances because of natural physical barriers, that will be complemented with permanent fencing where the first are not sufficient.

Tierra del Fuego NP: The expected result is the complete removal of horses and cattle from the polygon of intervention. Given that the park is close to suburban areas, the risk of reentrance of horses is not null. The risk will be managed through permanent fencing, community awareness work, and agreements with local enforcement agencies."

Feral livestock in PA are managed through species-specific techniques designed to ensure compliance with operational protocols:

Cattle: The APN establishes agreements with private partners who carry out the removal of live cattle under established protocols. Captured animals become the partners' profit. Once populations are reduced to densities where removal becomes economically unfeasible, the remaining individuals are killed by firearm.

Horses: Horses are captured and removed by park rangers with the support of hired assistants. The animals are then donated to various institutions and organizations.

Wild Pigs: Wild pigs are culled by shooting and subsequently disposed of. In the Ibera region, local authorities are advancing an initiative to create a value chain for wild pig meat, ensuring proper standards of meat handling and sanitation.

Axis Deer: Axis deer are culled by shooting and discarded. At the same time, efforts are underway to promote the use of axis deer meat in local gastronomy, particularly in restaurants and hotels, with the aim of increasing its consumption.

The project considers feral livestock as part of the IAS category. They are not native, they live in a wild state, they are not under human care, and in many cases, with time they revert to their wild forms. In management terms, they are managed as IAS. Paragraph 8 was changed to reflect this.

The reviewer's suggestion to consider a behavior change approach for addressing certain project challenges is both valuable and duly acknowledged. However, at this stage, the proponents consider that the selected strategies are more appropriate for the issues at hand and should be prioritized. Livestock management concerns, in particular, will be addressed through conventional tools such as awareness-raising and training. This position is based on several considerations: the executing agency and its institutional environment have scarce familiarity with behavior change methodologies; such approaches require specialized expertise that is not currently available in this context; and there is a lack of both theoretical grounding and practical training to support their effective application. Besides, the target audience is relatively small and can be reached intensively through the previously mentioned simpler tools. With respect to hypothesis testing, the project planning includes to establish baselines on local people's perceptions and attitudes related to the three main drivers of degradation, followed by monitoring the evolution of these social indicators. In summary, the proponents believe that a behavior change approach would be unnecessarily complex for this specific issue, which can be effectively addressed through more straightforward methods. Nevertheless, a more detailed evaluation of this suggestion will be undertaken during the project inception phase, in order to better assess its advantages and limitations and, if appropriate, incorporate it as part of an adaptive management strategy.

-The word contemplate has been changed under paragraph 56

The text was changed in paragraph 18 to "A central element of change will be exploring the development of financial sustainability mechanisms for the SNAP, using the six National Parks (NP) and the Natural Monument (NM) (Table 1) prioritized as examples." and paragraph 58 to: "Third, the project will support the development of sustainable financing mechanisms suitable for APN's SNAP (Output 1.1.3). The recovery of degraded ecosystems requires long-term, diversified, and resilient financial mechanisms that support both the environmental aspects of the initiatives, and socio-economic benefits for beneficiaries and stakeholders. The design of financial tools could include public or private investments through innovative models and instruments. Governance frameworks and monitoring of their transparency will be addressed along with the development of the mechanisms. The overarching aim is to ensure that restoration efforts are not only ecologically effective and socially inclusive but also financially [stable](#)."

d)NA

e)NA

f) NA

g) NA

h) NA

i) text was integrated to the following outputs (as well as indicators and definitions) in the Results Framework and throughout the project document:

1.1. Improvement of enabling conditions for ecological restoration success, including perspectives of women and men and promoting equal opportunities. 2.2 Strengthened capacities for invasive alien species and domestic livestock management in six protected areas and their buffer areas, with effective participation and incorporation of local knowledge and perspectives from men and women, as well as promotion of actions oriented to generate equal opportunities. 3.1: Strengthened knowledge management, awareness and communication about ecological restoration in protected areas and their buffer areas including perspectives and ensuring equitable participation conditions of men and women as well, in addition to youth. M&E Effective project-level monitoring and evaluation with perspective of equity and inclusion between men and women

Section D Policy Requirements in the GEF portal has some questions where it allows you to select Yes/No answer but in other questions is a checkbox. Where possible we have selected Yes or No but the following questions do not allow that: -Gender Equality and Women's Empowerment "If the project expects to include any gender-responsive measures to address gender gaps or promote gender equality and women empowerment, please indicate in which results area(s) the project is expected to contribute to gender equality"; "Generating socio-economic benefits for women" -Stakeholder Engagement "Select what role civil society will play in the project"; -Private section: "Will there be private sector engagement in the project?"; "And if so, has its role been described and justified in the section B "project description"?"

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project

- a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**
- b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**
- c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

5.3 Core indicators

- a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?**
 - b) Are the project's targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) /adaptation benefits reasonable and achievable?**
- Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?**

Secretariat comment at CEO Endorsement Request

1/29/2025

Yes.

Thank you for the revision. For future reference, there are basically no circumstances that park visitors or other tourists would be counted among beneficiaries.

11/17/2025

No.

a and b. Beneficiaries - Please review the guidance on how to calculate this as many more people are included than should be. Beneficiaries should be directly benefiting from the project and not

simply tourists who visit a national park. Also, simply being a resident of a nearby area is not sufficient to be a beneficiary. Please see: EN_GEF_C.62.Inf_.12.Rev_.01_GEF-8 Results Measurement Framework Guidelines

Restoration - The values are very large for natural habitat restoration. Please review the guidance on CI application to ensure alignment. We note that it requires the active implementation of "best practices" not a passive process or just the removal of vegetation.

Agency Response

12/10/2025

The final number of beneficiaries was reformulated to accurately reflect direct beneficiaries, following GEF guidelines. The number in the PIF included visitors to the public use areas of Tierra del Fuego NP and Glaciares NP, since the actions to be carried out in the project intervention area coincide with public use areas where IAS are present, and therefore control actions would have a positive impact on the quality of the visit.

Below we provide the visitor numbers for these two protected areas:

- ? Tierra del Fuego NP (2024 season): 494,205 visitors
- ? Glaciares NP (2024-2025) tourist season, southern and northern areas: 5,360 visitors

The Project was designed under the concept of ?ecosystem restoration? (as differentiated from ecological restoration). The use of this concept was not casual but selected to build the project within a wider frame of approaches, strategies, and goals. The GEF-8 Core Indicators implementation guide defines restoration as ?the process of repairing and/or assisting the recovery of land and ecosystems that have been degraded, damaged, destroyed, or modified to an extent that the land and/or ecosystem cannot fulfil its ecological functions and/or fully deliver environmental services?. And adds: ?restoration activities may include (i) ecosystem restoration that reduces the causes of decline and improves basic functions; and (ii) ecological restoration that enhances native habitats, sustains ecosystem resilience, and conserves biodiversity.? This project orients most of its investments in activities of the first category: those that reduce the causes of decline and improve basic functions.

The exhaustive list of restoration activities to be carried out include (following the [Glossary of TEEB/UN Decade](#)):

Within ?Biophysical interventions?:

? Restoration of vegetation cover: a) Fire management, b) Assisted Natural Regeneration, c) Tree and grass planting,

? Control of invasive species: a) Species control measures (mechanical)

? Agricultural practices: a) Pasture and forage crop improvement

Within ?Enabling interventions?:

Incentives for sustainable land use practices; Community consultations; On-site and on-line training; Development of guidance and course materials.

We provide in addition some examples of the type of intervention to be implemented: a) proactive capture and removal of IAS-feral cattle; b) regular prescribed burnings following mosaic patterns; c) mechanical eradication of an invader climbing shrub; d) planting grasses in Andean wetlands, e) fencing off parts of PAs to avoid reversal of achievements.

The size of the area proposed for restoration is large indeed. We would like to point out that 51.5% of the total restoration area involved in the project will be subject to improvements in livestock management within PAs and BAs. This is explained by the large extensions of productive units in Argentina. These improvements will be made hand in hand with livestock managers and external technical specialists. The sum of the large size of

certain types of agro-systems to be intervened, and the variety of interventions to be implemented in different places make the extended project restoration area.

5.4 Risks

a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?

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 assessed and rated and consistent with requirements set out in SD/PL/03?

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response

12/10/2025

NA

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

6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?

Secretariat comment at CEO Endorsement Request

1/29/2025

Yes.

11/17/2025

No, see above comments.

Agency Response

12/10/2025

The following text was added to paragraph 111: "This project directly aligns with GEF-8 Programming Directions by contributing to the Ecosystem Restoration Integrated Program,

strengthening biodiversity conservation under the Biodiversity Focal Area (BD-1, BD-2, and BD-3), and generating climate-resilience co-benefits consistent with GEF guidance."

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 comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

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 comment at CEO Endorsement Request

1/29/2025

Yes. Thank you for the revisions.

11/18/2025

No. Please focus in on the main targets this project will contribute to and identify how. This is often done in a table.

Agency Response

12/10/2025

Six main contributions to KM-GBF Targets were selected and are now presented in paragraph 112 and Table 4

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request

1/29/2025

Yes.

11/17/2025

No. The Indigenous Peoples Plan describes a plan for Free, Prior and Informed Consultation. The GEF safeguard standards require 'consent' rather than consultation. Therefore, it is not sufficient for the APN to consult with Indigenous groups but rather need to get explicit and specific approval (which is what is currently written). Please revise. FPIC refers to Free, Prior and Informed Consent and constitutes a collective right recognized for Indigenous Peoples. Consultation is an important component of FPIC, but it does not confer the same rights or obligations. Under the GEF's ESS policy, FPIC is a key requirement of the standard applicable to Indigenous Peoples.

1. Please revise the proposal and accompanying documents (CEO Endorsement document, Stakeholder Engagement Plan, ESS document, Indigenous Peoples Plan) to reflect that the project will uphold FPIC and not only conduct consultations.

2. Regarding budget Action, please ensure that adequate resources are allocated for the consultations and processes required to uphold FPIC.
3. In the table of key risks, the ESS risk level is indicated as 'Low'. However, it is not clear how this level was determined against each of the GEF's standards, nor what potential mitigation measures, where required, will be put in place. Annex 'F: Environmental and Social Safeguards Screen and Rating' does not provide sufficient detail to assess this. Please include a more detailed ESSS assessment aligned with all relevant standards, or an equivalent assessment consistent with the GEF's ESS Policy.
4. Please consider integrating indigenous Peoples governance mechanisms and their traditional and local knowledge into the protected areas and buffer areas management and including monitoring indicators to measure this progress particularly on Component 1 and 2.
5. It is critical to establish meaningful collaboration with Indigenous Peoples and local communities (IPLCs) in this project. Please ensure collaboration with IPLCs not only as beneficiaries but also as partners of the project implementation and decision-making, particularly for Component 1, 2 and 3.
6. Please ensure strengthening security of tenure in lands and territories held or used by Indigenous Peoples and local communities, where possible, and including monitoring indicators to measure this progress.

Agency Response

12/10/2025

The adequate references to Free, Prior and Informed Consent have been included or clarified when relevant. The IPP is meant to be a tool to engage with indigenous peoples at different levels of involvement in the project: in some cases, through free and prior informed consultation processes, and in others, where there is a direct impact and they are strategic partners through consultation to obtain consent

- 1) The adequate references to Free, Prior and Informed Consent have been included or clarified when relevant in CER, SEP and IPP. The PPG included a FPIC in accordance with GEF policy and the mechanisms of the communities involved. Consultation processes for FPIC will be carried out during the project at the necessary stages
- 2) The necessary resources, not only financial, are planned and secured for for the consultations and processes required to uphold FPIC. A reference was included in the IPP.
- 3) The classification of the project's environmental and social risk level as 'low' confirms the categorization granted and approved by the GEF at the PIF stage. It also reflects the incorporation of several safeguard instruments developed during the PPG phase, such as the risk matrix and mitigation measures (table included in the 'Risks to Achieving Project Outcomes' section of the CER ' after paragraph 101), and specific plans (GAP, SEP, and

IPP, attached to the CER as Annexes H, I, and J respectively). A summary of the analyses conducted, and the measures designed is presented in paragraphs 102 to 106 of the CER, as well as in the ProDoc. The resulting categorization takes into account the implementation of these actions and mitigation measures, in accordance with the environmental and social standards of all agencies involved in the project.

To provide further detail on alignment with the GEF Minimum Standards, additional information is included in the CER in paragraph 107 and Table 3. To complement Annex F of the CEO Document (Risk Assessment Sheet provided by CAF), a Safeguard Screening is added as Annex L (also attached to the ProDoc)

4) The PAs work with the IIPP, and project management decision-making processes are carried out through traditional governance mechanisms when relevant and indicated in the IPP as well as the CER. The traditional knowledge of Indigenous peoples is included in various project components when relevant (C1, C2, C3).

5) Indigenous and local communities play a key role in the project. They are included not only as beneficiaries but also as co-responsible actors in decision-making within committees, in the implementation of actions, and in the generation of lessons learned (C1, C2, and C3). Their role in CER and plans was further clarified.

6) Indigenous peoples maintain ownership of their land with individual titles in Pozuelos and national and provincial recognition of their territories. In the PAs where the project will work with Indigenous peoples, it will strengthen their capacity to manage their lands, territories, and resources sustainably by working with them on skills, tools, and practices for sustainable livestock management.

8 Annexes

Annex A: Financing Tables

**8.1 GEF Financing Table and Focal Area Elements: 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 comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

Focal Area allocation?

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

12/10/2025

NA

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

12/10/2025

NA

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response

12/10/2025

NA

Focal Area Set Aside?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

12/10/2025

NA

8.2 Project Preparation Grant (PPG)

a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement Request

1/29/2025

Yes.

11/17/2025

No, please provide more information about activities and expenditure categories covered by the PPG funding.

Please remove decimal places from all financing tables in Portal.

Agency Response

12/10/2025

The status of utilization of PPG has been updated to align with the GEF guidelines and the decimal places have been removed

New Excel sheet with the description of the funds is now uploaded through the roadmap documents section of the project.

8.3 Source of Funds

Does the sources of funds table match with the amounts in the OFP's LOE?

Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement Request

1/29/2025

Yes.

11/17/2025

No,

•Please submit the English translation of all cofinancing letters of support.

•Please provide confirmed letter of cofinancing for the Argentina ? Admnistraci?n de Parques Nacionales amount of USD 30,520,800.00.

Agency Response

12/10/2025

the English translation of all cofinancing letters have been Uploaded including the one from the APN

Annex B: Endorsements

8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:

Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?

Secretariat comment at CEO Endorsement Request

NA

Agency Response

12/10/2025

NA

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response

12/10/2025

NA

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response

12/10/2025

NA

Annex C: Project Results Framework

8.6 a) Have the GEF core indicators been included?

b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of total project financing (too high? Too low?)

c) Are all relevant indicators sex disaggregated?

d) Is the Project Results Framework included in the Project Document pasted in the Template?

Secretariat comment at CEO Endorsement Request

1/29/2025

Yes.

11/17/2025

No, we encourage the project proponents to review the newly adopted GBF Indicators Framework and seek to align with it.

Agency Response

12/10/2025

We included alignment to GBF Indicators in the definition of the GEF CI, as well as sex disaggregated indicators, in the Results Framework

Annex E: Project map and coordinates

8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?

Secretariat comment at CEO Endorsement Request

11/17/2025

Yes.

Agency Response

12/10/2025

NA

Annex G: GEF Budget template

8.8 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?

b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?

c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement Request

5/11/2026

Yes. Thank you for the revisions.

4/28/2026

No, the budget continues to have numerous items that do not align with GEF approaches for support including close to 2 million for heavy equipment. The information on vehicles remains inadequate and unclear given the size of the allocation. Please fully address these issues before resubmission.

4/2/2026

No, the budget lacks significant information required and does not align with agreed upon support including for a small number of vehicles which is a budget line of half a million dollars.

1. On the Project Unit Consultants: we are still seeing one line for a bundle of consultants. We would like to see one row for each consultant, individualize the cost and see the terms of reference in the prodoc.

Salary / Staff costs	Technical lead	3.990,92	9.222,51	37.822,27	27.471,59	7.847,27	86.354,55	2.014,17	4.586,33	92.955,05	National Parks Administration
	Project Unit Consultants						0,00	73.464,47	220.393,41	293.857,89	National Parks Administration

2. The office supplies are still charged to component 2. Please charge this to the PMC.

Office Supplies	Office supplies	0,00		9.820,86	0,00		9.820,86			9.820,86	National Parks Administration
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3. The *travel* category includes costs for 424K and does not provide any level of details on the activities implemented with these funds. Please provide additional details for each sub-category (fuel, travel expenses and per diem)

Travel	Fuel, travel expenses, per diem			195.862,98	69.314,86	86.102,72	351.280,55		73.496,98	424.777,53	National Parks Administration
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4. *Non-consulting services* is not a category under the Budget template provided in the Appendix A of the Guidelines on the Project Cycle. Please use the categories provided in the template. *Flights* should be moved to the *Travel* category. What is the link between construction of fences and veterinary services? Please provide additional details for this specific item line.

Non-consulting services	Construction of fences, veterinary services			213.855,70	77.824,77		291.680,48			291.680,48	National Parks Administration
	Production of audiovisual, graphic and digital materials					256.154,08	256.154,08			256.154,08	National Parks Administration
	Flights for EEI and native wildlife monitoring		16.346,68				16.346,68			16.346,68	National Parks Administration

5. We see 430k have been mapped to Contractual services ? individual. It seems to comprise multiple activities - please describe the different consultants in individual budget lines.

Contractual Services - Individual	Financing mechanisms restoration, advisory services, livestock management, baseline and monitoring restoration, communication strategy	80.111,00	59.901,76	35.542,30	86.493,17	153.222,78	415.271,01	15.000,00		430.271,01	National Parks Administration
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6. We noticed that you have approved the purchase of one pickup truck and two quads/ATV: more than half a million dollars are allocated for vehicles, which represents nearly 9% in a \$6.8 million-dollar project. Please seek Manager approval.

Vehicles	Trucks, boat			247.702,91	287.668,64		535.371,56			535.371,56	National Parks Administration
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3/13/2026

No.

a. The GEF cannot be expected to purchase 3 vehicles for a single national park as proposed by the agency. The number of requested vehicles (9) is just under the total number of park staff (10) and more than that when combined with the existing fleet. This is excessive and should be covered by co-financing.

1/29/2026

No.

1. Vehicle purchase is strongly discouraged with GEF resources and should be undertaken with co-financing resources. This follows findings from the GEF IEO. For any request, there needs to be a specific description of the type and number of vehicles with a strong justification for the exception. At this point, it is not sufficient.

- Still, there is not a list for all positions under Project Unit Consultants into separate lines with associated budget allocations by components, M&E, PMC as relevant. Please provide TOR for all staff positions: this is the only way we can assess the reasonability of the position vis-a-vis the costs and the sources from which the positions are covered (project components / M&E / PMC)

Expenditure Category	Detailed Description	Component 1	Component 2		Component 3	Sub-Total	M&E	PMC	Total (USD eq.)	Responsible Entity
		Outcome 1.1	Outcome 2.1	Outcome 2.2	Outcome 2.3					
Goods	Notebooks, projectors, microphones, servers			48,499.05	32,450.15	26,345.77	107,294.97		107,294.97	National Parks Administration
	Road machinery (backhoes) for construction and maintenance of firebreaks, tractors, grass cutting implements, wood chippers			551,362.53	791,458.49		1,322,821.02		1,322,821.02	National Parks Administration
	Camera traps, GPS, biological monitoring instruments, drones, weather stations		274,982.20		39,329.31		314,311.50		314,311.50	National Parks Administration
	Firefighting equipment (handheld radios, weather station, dome)				204,110.23		204,110.23		204,110.23	National Parks Administration
	Fencing materials, water troughs, electric fences			843,889.34	135,621.69		979,511.03		979,511.03	National Parks Administration
	Traps, trap-making materials, and other IAS			194,498.67			194,498.67		194,498.67	National Parks Administration
	Fire control supplies, Personal protective equipment				34,109.14		34,109.14		34,109.14	National Parks Administration
	Sampling materials (camera trap batteries, sampling equipment, and laboratory analysis)		41,374.52				41,374.52		41,374.52	National Parks Administration
Vehicles	Trucks, boat			247,702.91	287,668.64		535,371.56		535,371.56	National Parks Administration
Contractual Services - individual	Financing mechanisms restoration, advisory services, livestock management, baseline and monitoring restoration, communication strategy	80,111.00	59,901.76	35,542.30	86,495.17	153,222.78	415,271.01	15,000.00	430,271.01	National Parks Administration
Contractual Services - Company	National restoration guidelines for APN, Livestock management, Baseline and monitoring plan for restoration actions, Ecological role of fire	46,072.51	242,076.58	56,064.83	39,086.10		383,300.02	30,000.00	413,300.02	National Parks Administration
Non-consulting services	Construction of fences, veterinary services			213,855.70	77,824.77		291,680.48		291,680.48	National Parks Administration
	Production of audiovisual, graphic and digital materials					256,154.08	256,154.08		256,154.08	National Parks Administration
	Flights for EEI and native wildlife monitoring		16,346.68				16,346.68		16,346.68	National Parks Administration
Salary / Staff costs	Management	3,000.00	6,533.64	13,533.33	13,421.80	3,643.33	46,064.68	3,264.43	49,329.11	National Parks Administration
	Project Unit Consultants					0.00	79,464.47	220,393.41	299,857.88	National Parks Administration
Trainings, Workshops, Meetings	Inception Workshop, local advisory committees, interjurisdictional coordination instances, knowledge exchange meetings	139,577.04		70,434.31	19,375.78	15,365.00	244,752.13	12,069.53	256,821.66	National Parks Administration
Travel	Fuel, travel expenses, per diem			195,862.08	69,314.86	86,102.72	351,280.55	79,494.89	424,775.43	National Parks Administration
Office Supplies	Office supplies	0.00		9,820.86	0.00		9,820.86		9,820.86	National Parks Administration
Other Operating Costs	Vehicle services			12,979.11			12,979.11		12,979.11	National Parks Administration
	Software licenses			3,450.00	32,200.00		35,650.00		35,650.00	National Parks Administration
Agency fees/ Grant:							0.00		0.00	

•Still Office supplies are charged to the components ? they should be charged 100% to PMC. Please revise the budget.

•We will review the budget when resubmitted and provide comments if appropriate

•The CEO Endorsement Request Portal view, which is the document that is posted on the web after endorsement (see attached pdf file), has several sections with yellow shadows. Please ask the Agency to remove the yellow shadows when resubmitting.

11/17/2025

No,

1. Vehicles are strongly discouraged from the GEF funding, please explore co-financing to cover for these costs.

2. Please list all positions under Project Unit Consultants into separate lines with associated budget allocations by components, M&E, PMC as relevant. Please provide TOR for all staff positions: this is the only way we can assess the reasonability of the position vis-a-vis the costs and the sources from which the positions are covered (project components / M&E / PMC)

Salary / Staff costs	Technical lead	3,990,92	9,222,51	37,822,27	27,471,59	7,847,27	86,354,55	2,014,17	4,586,33	92,955,05	National Parks Administration
	Project Unit Consultants						0,00	73,464,47	220,393,41	293,857,89	National Parks Administration

3. Office supplies should be charged 100% to PMC but not to project components. Please revise the budget.
4. Please upload a budget table preferably in excel format, but not as an image pasted to a word document
5. We will review the budget when resubmitted and provide comments if appropriate.

Agency Response

05/06/2026

A revised version of the project budget has been uploaded. A minimal budget has been allocated for the acquisition of road machinery to be used for the construction and maintenance of firebreaks, as well as for the implementation of the Fire Management Plan in Lihue Caley National Park. Additionally, APN will contract consultant services to provide specialized equipment and materials for ecological restoration and the development of sustainable livestock management plans. Detailed information on vehicles is provided in Annex G.

04/10/2026

A word file and an excel file have been uploaded to the document section of the roadmap with the changes:

1. The budget has been revised and each consultant is now presented in an individual row, with specific costs clearly identified. The corresponding Terms of Reference can be found in the documents section of the roadmap.
2. The allocation of office supplies has been corrected and is now charged to the Project Management Costs (PMC), as recommended.
3. The travel budget has been fully disaggregated. Detailed breakdowns are now provided for each sub-category, including fuel, travel expenses, and per diem
4. The budget has been aligned with the official template provided. The "Non-consulting services" category has been removed, and all items have been reassigned accordingly. The "flights" on that category are not commercial flights, but the services of a company for aerial monitoring, the detailed description has been modified to avoid misunderstandings
5. Contractual Services - Individual has been disaggregated. Individual consultants are now presented in separate budget lines, with detailed descriptions.
6. The version of the budget previously reviewed was outdated. The updated budget now includes a fully disaggregated breakdown of vehicle-related costs. The total allocation for vehicles amounts to USD 270,409 not USD 535,371.

03/20/2026

The vehicle budget has been revised, reducing allocations for Iber? National Park (from 3 to 1, 4x4 pickup and from 4 to 1 quad, with one quad reassigned to Campos del Tuy? National Park). The Annex M has been updated accordingly.

In line with GEF guidance, additional mobility needs for restoration activities will be covered through co-financing from the National Parks Administration, the Province of Corrientes, and other co-financing institutions.

With these adjustments, the combination of existing fleet, project-supported vehicles, and co-financing ensures sufficient operational capacity to achieve the planned restoration targets.

02/25/2026

An Annex was added with the following explanation, as Annex M in the CER and Annex 10 in the ProDoc: "The protected areas selected for this Project that have requested the acquisition of vehicles are located in remote areas, far from major urban centers, and are characterized by geographic and environmental conditions that limit operational mobility. In this context, the availability of appropriate vehicles constitutes an essential operational input for the effective implementation of the planned activities. The need for these vehicles was identified and prioritized by the National Parks themselves during the Project preparation workshops. Although the protected areas currently have some vehicles, in certain cases these are not sufficient to carry out the restoration activities planned under this Project. The addition of vehicles to the fleets of the protected areas that have requested vehicles is essential for: i) the establishment of baselines and biodiversity monitoring; ii) the prevention and initial attack of wildfires; and iii) the implementation of on-the-ground actions related to the control and management of invasive exotic species in the intervention areas. To carry out the planned activities, Campos del Tuy?, Iber?, and Los Glaciares National Parks have requested the acquisition of vehicle equipment tailored to each type of intervention, including a pickup truck equipped with an initial fire attack kit, two 4x4 pickup trucks for monitoring and fire control, one utility terrain vehicle (UTV), two 4x4 quad bikes, and one boat. The requested vehicles directly respond to terrain conditions and to the technical requirements of the planned field activities. It should be noted that the National Parks Administration has already committed, as co-financing, its own equipment from the protected areas, including existing vehicles, which will be used to cover administrative and logistical needs of staff.

Specifically regarding Iber? National Park, this protected area currently has a staff of 10 park rangers responsible for overseeing more than 195,000 hectares. The existing fleet (1 quad bike, 1 van, and 3 pickups), committed as a counterpart, is operating at maximum capacity to cover critical tasks such as control and surveillance, fire prevention and control, among other actions related to the management of the conservation unit.

The intervention area within Iber? National Park covers 38,000 hectares—one of the Project's largest areas—divided into three large, distant nuclei (Laguna Iber?, Cambyret?, and San Nicol?s), with an execution timeframe of four years. To achieve the restoration goals (6,700 ha of hygrophilous and xerophilous forest, 6,800 ha of wetlands, and 24,500 ha of grassland), it is essential to ensure the availability of vehicles that allow protected area personnel to carry out the invasive alien species control, biodiversity monitoring, fire prevention, and livestock management activities planned in the Project.

The acquisition of the requested vehicles is a critical success factor for the timely and proper operational deployment of the restoration projects. This investment ensures compliance with Core Indicator 3, "Land area and ecosystems under restoration," by guaranteeing that the areas under restoration receive the required technical intervention. Furthermore, this is a sustainable

investment, as these assets will become part of the heritage of the protected areas to which they are delivered and will be maintained and used for the same operational purposes after Project closure.

Protected Areas and Requested Equipment

Iber? National Park - Land area and ecosystems under restoration: 38,000 ha

- ? 1 customized Chevrolet Silverado pickup truck (with initial fire?attack kit)
- ? 1 4x4 pickup truck (monitoring)
- ? 1 4x4 pickup truck (fire control)
- ? 1 UTV (Utility Terrain Vehicle)
- ? 4 4x4 quad bikes

Campos del Tuy? National Park - Land area and ecosystems under restoration: 3,150 ha

- ? 1 boat
- ? 1 four?stroke, 20 HP outboard motor

Los Glaciares National Park - Land area and ecosystems under restoration: 21,300 ha

? 5 propellers (11 1/8 x 13) for the Lake Roca sector

•5 propellers (13 x 19) for the Lake Moreno sector

- The TOR, positions under the project unit consultants and office supplies issues were addressed and the corrected documents were uploaded on 12/10/2025. Please refer to documents titled: REVISED Annex K ToR for GEF funded staff Restoration APN and REVISED Annex G GEF Project Budget Restoration APN in excel format as was requested before

- The yellow shadows have been removed.

12/10/2025

1) We acknowledge the GEF's guidance regarding vehicle purchases. However, we clarify that these costs are not allocated to Project Management Costs (PMC) nor Project Preparation Grants (PPG), where the *GEF Project and Program Cycle Policy Guidelines (2025 update)* explicitly mark such expenditures as ineligible or strongly discouraged.

Instead, these vehicles are budgeted under the technical investment components of the project, consistent with the standard GEF budget categories. Their acquisition is justified by the specific operating environment and is critical for the achievement of project results. The project targets highly dispersed and remote protected areas where no reliable public or rental transport exists. Without these dedicated vehicles, the technical teams cannot perform essential field activities during the implementation of the project such as ecological monitoring, or community engagement in isolated rural areas. Dedicated vehicles significantly reduce operational costs and delays while strengthening long-term institutional capacity for protected area management.

2) corrected and uploaded

3) corrected and uploaded

4) The budget table is now uploaded in excel format through the roadmap documents section of the project

Annex H: NGI Relevant Annexes

8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.

b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.

c) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat comment at CEO Endorsement RequestNA

Agency Response

12/10/2025

NA

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

5/11/2026

Yes.

4/28/2026

No, see comments on the budget.

4/7/2026

No, please see comments on the budget.

3/13/2026

Not at this time.

1/29/2025

Not at this time.

11/17/2025

Not at this time. Please revise and resubmit.

9.2 Additional Comments to be considered by the Agency during the inception and implementation phase

Secretariat comment at CEO Endorsement Request

9.3 Review Dates

First Review

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)

CEO Approval Response to Secretariat comments

12/10/2025

2/25/2026

3/20/2026

4/10/2026