

Fareeha Iqbal

Ecosystem based adaptation for improved livelihood in Tuvalu

Basic Information GEF ID 10926 Countries Tuvalu **Project Title** Ecosystem based adaptation for improved livelihood in Tuvalu **GEF Agency(ies) UNEP** Agency ID UNEP: NA GEF Focal Area(s) Climate Change **Program Manager**

PIF

art I - Project Informatic

Focal area elements

1. Is the project/program aligned with the relevant GEF focal area elements in Table A, as defined by the GEF 7 Programming Directions?

Secretariat Comment at PIF/Work Program Inclusion

5/10/22:

Cleared. Understood it is included in Table G though not in the 'Project Information' section as it is not a drop-down menu term.

4/15/2022:

Not yet. Please also include "nature-based solutions" in the taxonomy; it does not appear yet.

3/3/22:

Adjustments are requested.

For the 'Project Information' section:

- 1) Please include adaptation-related keywords in the taxonomy (e.g., "climate change adaptation", "coastal resilience", "small islands", "nature-based solutions" etc.) and please remove the term "focal areas" from the taxonomy.
- 2) Please enter some sectors.
- 3) As this is an adaptation project, it should have a Rio Marker value of "2" for Adaptation.

For Table A:

Please note that CCA-3 should be selected only if a project is directly supporting the NAP process (including implementation of NAP priorities). Please clarify if this is the case, otherwise kindly remove CCA-3 from Table A. If CCA-3 is selected, then the corresponding NAP-related box will need to be checked on the meta-indicator sheet.

General:

- a) The Theory of Change cannot be read as the text is blurry. Please upload a sharper image.
- b) The various figures in Annex A do not display.

Agency Response

5/4/22:

'Nature-based Solution' has been added in the taxonomy table in Section G of the PIF (Page 6) as suggested.

Response08/04/2022

- 1) The usage of "Focal areas" has been removed from the Taxonomy table. Climate change adaptation, coastal resilience, Small Island Developing States and nature-based solutions have been added in the Taxonomy table.
- 2) Sectors have been clarified in the table
- 3) Reference to the appropriate Rio markers for the project have been added in the table.

Table A:

This project will not contribute to NAP formulation/implementation, therefore reference to CCA-3 has been removed from the document.

General:

The Theory of Change file will be resubmitted as separate files alongside the PIF to avoid compression issues.

Indicative project/program description summary

2. Are the components in Table B and as described in the PIF sound, appropriate, and sufficiently clear to achieve the project/program objectives and the core indicators?

Secretariat Comment at PIF/Work Program Inclusion 4/18/22:

Cleared.

3/3/22:

Further information is requested:

- a) Table B: Please provide justification for the slightly elevated (5.2%) PMC request.
- b) Table B appears incomplete. While the main text refers to Outcome 1.2 and its subcomponents, these do not appear in Table B, which only shows Outcome 1.1.

Main text below Table B:

c) Please correctly format the sections between Table B and Part C, as it is hard to read, with table/figure headings separated from the tables; sections headings and main text indistinguishable from each other, and multiple sections presented as a single paragraph.

Numbering the paragraphs would be helpful for comment provision.

d) As mentioned above, please remove all reference to Objective CCA-3, unless clear explanation is provided that this project is directly supporting NAP formulation or implementation.

Agency Response

Response08/04/2022

- a) PMC costing has been adjusted to below 5%
- b) We believe this was a text error that took place in the document at portal submission. We have resubmitted table B with outcome budgets separated to avoid the portal submission issue.
- c) This was also the result of the abovementioned error which de-formatted Table B. WE have resubmitted the text in Part C, paragraphs numbered.
- d) CCA-3 has been removed from the PIF, as per above comment.

Co-financing

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, with a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized?

Secretariat Comment at PIF/Work Program Inclusion 5/10/22:

Cleared.

4/18/22:

Not yet. Please provide a brief description of the expected investment mobilized (grant co-finance).

3/3/22:

Not yet. Please correct the categorization of cofinance for rows 2 and 3 of Table C. Grant finance is not labeled as recurrent expenditure.

Agency Response

5/4/22:

The identified co-finance will be provided by two projects, namely 'Climate and Oceans Support Program in the Pacific' (COSPPAC 2, funded by the Government of Australia) and 'Enhancing climate information and knowledge services for resilience in 5 island countries of the Pacific Ocean' (funded by the GCF). This project will leverage from the climate information services and knowledge products developed by these two projects to enable and strengthen the uptake of climate-resilient practices, as well as build the knowledge and awareness of climate change adaptation. The co-financing has been broken down as US\$ 760,500 and US\$ 3,7 million from the COSPPAC 2 and 'Enhancing climate information and knowledge services for resilience in 5 island countries of the Pacific Ocean' projects, respectively. Additional details are provided under the section: 'Coordination with other projects and programmes of relevance' in Table 7. The description is also added in the justification section of the portal.

Response08/04/2022

Grant finance has been changed from "Investment mobilized" to "Recurrent expenditures" in rows 2 and 3 of the co-finance table and entered in portal.

GEF Resource Availability

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

Secretariat Comment at PIF/Work Program Inclusion Yes.

Agency Response

The STAR allocation?

Agency Response
The focal area allocation?
Secretariat Comment at PIF/Work Program Inclusion n/a
Agency Response
The LDCF under the principle of equitable access?
Secretariat Comment at PIF/Work Program Inclusion Yes.
Agency Response
The SCCF (Adaptation or Technology Transfer)?
Secretariat Comment at PIF/Work Program Inclusion n/a
Agency Response

Secretariat Comment at PIF/Work Program Inclusion n/a
Agency Response
Impact Program Incentive?
Secretariat Comment at PIF/Work Program Inclusion n/a
Agency Response
Project Preparation Grant
5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)
Secretariat Comment at PIF/Work Program Inclusion Yes.
Agency Response

ו טעמו מובמ שבנ־משועב:

Core indicators

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

Secretariat	Comment at P	F/Work Program	Inclusion	4/18/22:
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Cleared.

3/3/22:

Not yet.

- a) Core Indicator 1 has a value of 2,600 people. However, the PIF entry states that 3,400 direct beneficiaries are expected. Please keep both figures consistent.
- b) The proposed number of direct beneficiaries (even if 3,400) is lower than what we would expect for an LDCF grant of this size to achieve, as we aspire for high impact from the projects. We understand that the populations on these islands are sparse. Please explore ways to enhance impact, such as: (i) options to increase the number of direct beneficiaries to the extent possible, (ii) offering an expanded scope of adaptation measures for these communities, beyond what has been proposed, and in alignment with identified adaptation needs for the country as per national strategies/plans. Will the project share lessons learned or techniques with other islands facing the same issue? c) Re Core Indicator 4, please consider training a greater number of people if possible, and/or a "training of trainers" approach.

Agency Response

Response08/04/2022

- a) Beneficiary numbers in the LDCF Core Indicator Annex have been corrected accordingly
- b) (i) Accordingly, direct beneficiaries of the project have been increased to 4200 to comprise the total rural population of the country. This amounts to ~37% of Tuvalu's population. Benefits will reach the rural population through a suite of EbA interventions to support the agricultural adaptation focus of the project, as well as locally appropriate livelihood diversification options (such as fisheries) strengthened training programmes and knowledge sharing. (ii). Project alignment with national adaptation priorities has been clarified in section 7.

Indirect beneficiaries have been increased to comprise the urban population of the country through the justification that many rural households have family ties in urban areas, and that the project will help reduce rural to urban migration is placing pressure on the countries urban areas. Through our analysis it was found not possible to include the urban population as direct beneficiaries without significantly shifting the focus of the project design, as there is no room for agriculture or EbA interventions in urban areas.

c) Number of beneficiaries trained has been increased accordingly. We have increased the number to 100 government staff, as well as adding the additional direct beneficiary numbers through community training. A training of trainers approach has been clarified in the project strategy to assist in upscaling objectives, as noted in paragraph 52.

Project/Program taxonomy

7. Is the project/program properly tagged with the appropriate keywords as requested in Table G?

Secretariat Comment at PIF/Work Program Inclusion 5/10/22:

Cleared.

4/18/22:

Please include "nature-based solutions"; it does not appear yet.

3/3/22:

Not yet. Please include adaptation-related keywords in the taxonomy (e.g., "climate change adaptation", "coastal resilience", "small islands", "nature-based solutions" etc.) and please remove the term "focal areas" from the taxonomy.

Agency Response

5/4/22:

As provided above, 'Nature-based Solution' has been added in the taxonomy table in Section G (Page 6) as suggested. However, the option is not found in drop down menu in Portal.

Response08/04/2022

The usage of "Focal areas" has been removed from the Taxonomy table. Climate change adaptation, coastal resilience, Small Island Developing States and nature-based solutions have been added in the Taxonomy table.

art II - Project Justification

1. Has the project/program described the global environmental/adaptation problems, including the root causes and barriers that need to be addressed?

	Secretariat Comment at PIF/Work Program Inclusion
	Yes.
	Agency Response
2	. Is the baseline scenario or any associated baseline projects appropriately described?
	Secretariat Comment at PIF/Work Program Inclusion
	4/18/22: Cleared.
	3/3/22: Not yet. (In addition to providing the agency response to the comments below, please also provide added explanation/description in the actual Portal entry text, where applicable. This comment applies to all review comments. Please also avoid highlighting the new text in the Portal entry. You may wish instead to number the paras for easy reference to changed/added text.)
	Please provide more context and background on "pulaka pits": a) How do they work, what is their significance, what is the extent to which island communities are dependent on them as a food source, and what would the impact on communities be in the absence of the proposed project interventions? b) Cultural factors are important but are just one consideration; what about nutrition, income, etc.? Is this their primary food crop? Why is diversification not possible?

c) How does pulaka production relate to adaptation priorities identified in national strategic climate change related documents? Please

Agency Response

Response08/04/2022

provide this important background/baseline information.

Paragraph numbering has been added for easier tracking of the latest changes.

Pulaka pit context:

- a) The construction and operation of the pulaka pits has been described in greater detail in paragraph 10, 11 and 12, was well as pulaka's cultural and dietary significance. Island communities have become increasingly dependent on nutrient poor imported food because of the dual factors of i) the salinization of the pulaka pits and ii) imported starch foods flooding the markets. Therefore, communities are not as dependent on them as they were historically, however communities still show traditional preference for local foods. Without the project's interventions, salinisation from increasing sea level rise (SLR) and storm surges, as well as prolonged droughts, will continue to impact pulaka production, with adverse consequences for rural communities' food security and cultural heritage.
- b) The nutritional benefits of traditional crops over imported staple foods has been clarified. Pulaka is the most important traditional crop in Tuvalu, while coconut is the most important economic crop. Coconut is eaten on a more frequent daily basis, while pulaka serves as a feast crop and reserve staple crop during prolonged drought periods when fruit crops fail. Diversification with high yield fruit crops is not possible in the pulaka pits due to saline conditions, while diversification with other salt-tolerant crops is not attractive when compared to pulaka due to yield and traditional preference.
- c) Prioritisation of increasing resilience of pulaka production in strategic national documents has now been noted in paragraph 81
- 3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?

Secretariat Comment at PIF/Work Program Inclusion

5/10/22:

Cleared for PIF stage.

However, in the eventuality that land-use for the pulaka pits changes over the years and the plastic needs to eventually be removed, by CEO endorsement please do include a potential safe disposal plan.

4/18/22:

Please discuss the eventual disposal plan for the plastic that will be provided through this project. Will there be measures in place to dispose of it in an environmentally-friendly manner, when the time comes?

3/3/22:

Not yet.

- a) Please discuss the decision to focus on a single crop (pulaka) in the context of the climate change adaptation good practice of diversification of crops and livelihoods. While we understand that the soils are not suitable for intensive agriculture, would it be possible to diversify subsistence agriculture, including with salt-tolerant crop species that may survive poor soils?
- b) What are some of the livelihood diversification options under consideration, mentioned in Output 1.2.3? Please provide a menu of notential activities for the various subcomponents, especially for FbA cropping and livelihoods

potential activities for the randas subscriptinette, especially for Ebri, orapping and intelligence.

- c) We appreciate the activities focused on improving the enabling environment for EbA. However it is unclear what actual on-the-ground EbA investments are being proposed. The PIF states that the project will support "restoration and conservation of degraded atoll
- ecosystems" and in "and 180 ha of coastal ecosystems surrounding the pits". Please describe the proposed activities. If not known yet, please discuss in broad terms, by providing a suite of options.
- d) Please identify the full suite of potential activities that the project will support, clarifying their potential help communities adapt to current and future climate, including variability and extremes. At present the focus seems to be on plastic lining of the pits, raising the bed height, and rainwater harvesting, with possible drip/tank irrigation. As mentioned earlier in the review, please consider an expanded scope of activities, and/or beneficiaries.
- e) Please consider more environmentally-friendly solutions than plastic lining. Along with issues relating to plastic pollution, what assurance is there that chemicals from the plastic will not leach into the soil and contaminate the crops? What assurance is there that communities will have access to good quality plastic in subsequent years if/when they need to replace it for any reason?
- f) It appears the primary source of irrigation for the pits is expected to be harvested rainwater. Has an assessment been undertaken—which includes precipitation projects under climate change scenarios—that shows that this will be reliable and sufficient, especially given that there will likely be competing uses for it?
- g) As part of Component 2, please include a stocktake of national policies and plans in order to identify the best entrypoints for mainstreaming EbA.
- h) Please seek opportunity for continuous training or "training of trainers", perhaps in synergy with other related interventions.
- i) We appreciate the proposed land use zoning exercise, as well as intent to involve religious leaders in awareness and outreach.

Agency Response

5/4/22:

The project will use a biodegradable, impermeable geotextile with a lifespan of 200 years, therefore a disposal plan would not be necessary. Modern agricultural geotextiles are made from polymers which are chemically and biologically neutral, remaining stable between pH levels 1–14 and up to 150°C while having a life expectancy of more than 200 years when buried. In consultations with GoT and regional experts, it was noted that no EbA measure would sufficiently impede salinisation of the pulaka pits as compared to impermeable geomembranes. This conclusion was reached after Tuvalu had trialled various techniques to address soil salinisation. The information is reflected in footnote 95 and explained in paragraph 63.

Response08/04/2022

a) Aside from being an essential component of Tuvalu's cultural heritage, there are several benefits to cultivating pulaka that make it the most appropriate crop of choice for the proposed project. The justification for selecting a single crop is explained in paragraph 38 by first discussing the criteria for selection, followed by an evaluation of the benefits and drawbacks of each potential crop and, finally, an explanation of why pulaka is the most appropriate crop for the proposed project. Pulaka cultivation is practised by ~80% of Tuvaluan households, particularly on the outer islands, creating a suitable foundation from which to build the project. Coconut is the only other subsistence crop capable of cultivation under extreme atoll conditions. However, the crop performs poorly in drought conditions and becomes increasingly susceptible to extreme winds with age. It would require considerable additional investment to incorporate coconut crops into the project.

h) Pural Tuyaluans have limited ontions for diversified livelihoods beyond subsistance agriculture. However local sustainable fisheries are a

viable livelihood model that will be developed under the project. Specifically, the project will explore a locally managed marine area (LMMAs) approach to fisheries conservation and management, as has been adopted in several pacific island countries. This approach relies on traditional authority to establish and manage marine conservation and managed use sites. The basic approach is that through traditional authority, no-take "Tabu" sites are established over multiple years while other areas are either open or under certain restrictions. The spill over from the "Tabu" sites provide benefit as food source for community. Tuvalu is well placed to do this since through the Falekaupule Act, traditional island councils are recognized and have delegated governance authority for their island communities. The project will facilitate establishment of LMMAs on each island, supported by capacity building for management and monitoring of the sites so they are able to gauge the effectiveness of the approach. There is a well-established Pacific LMMA network that the project will engage with to assist through South-south sharing of experiences, lessons learnt and capacity building. This information has been added in paragraph 47.

- c) Options for on-the-ground EbA interventions implemented under the project include: i) establishing a protected area and associated management plan for the 180 ha of coastal ecosystems surrounding the pulaka pits; and ii) replanting and restoring coastal vegetation, such as mangroves, to limit saltwater intrusion resulting from storm surges (paragraph 43). A detailed assessment of site-specific EbA interventions will be conducted during the PPG phase of the project.
- D) More detail on EbA options have now been included (under response to point C above), as well as greater detail livelihood diversification (under response to point B above). It has been noted that EbA interventions will act as a buffer to climate shocks on subsistence agriculture, with livelihood diversification will provide further adaptation options to communities.
- e) In consultations with GoT and regional experts, it was noted that no EbA measure would sufficiently impede salinization of the pulaka pits as compared to impermeable geomembranes. This conclusion was reached after Tuvalu had historically trialled various techniques to address soil salinization. The project will make use of environmentally neutral geotextile to ensure the ecological sustainability of this intervention. Modern agricultural geotextiles are made from polymers which are chemically and biologically neutral, remaining stable between pH levels 1–14 and up to 150°C while having a life expectancy of more than 200 years when buried. In the case of this project, impermeable sheeting will be used.
- f) The drip irrigation will be supplementary to and not serve as a replacement for existing irrigation methods such as groundwater rainfed irrigation. This will ensure there is an adequate supply for water for the pulaka pits during dry periods that will extend in the future as a result of increased rainfall variability. A high-level estimation of rainwater storage capacity over dry periods has been included (paragraph 46), as based on the National Building Code and national average rainfall. The PPG phase of the project will determine the exact number of rainwater harvesting tanks necessary, as well as calculate how much rainwater can be stored under climate change scenarios.
- g) At PIF stage, the project has identified: i) Te Kete (Tuvalu National Sustainable Strategy); ii) Vakafenua (Climate Change Policy); and iii) the Climate Change Resilience Act 2019 as entry points for mainstreaming EbA.

Additionally, it has been noted (paragraph 51) that the project will review a section plan by the Public Works Department that was developed for pulaka pit protection as part of a previous project, in order to identify potential integration of the proposed project's objectives at the subnational level.

As part of the full project formulation process, national policies and plans (including agricultural plans, water plans and biodiversity plans) will be reviewed to identify any gaps for EbA mainstreaming. Additionally, where EbA has already been mainstreamed, these policies will be reviewed to ensure that they make adequate provision for supporting the proposed project.

h) It has now been noted (paragraph 52) that the project's community training and institutional capacity building activities will follow a training of trainers approach to assist in upscaling the lessons learned of the project and in replicating these benefits beyond the project's lifespan.

Secretariat Comment at PIF/Work Program Inclusion
4/18/22: Cleared.
3/3/22: Yes. However, please remove Objective CCA-3 from Table A and references to it in the main text, for the reasons described above.
Agency Response
Response08/04/2022 Accordingly, CCA-3 has been removed from the document.
. Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?
Secretariat Comment at PIF/Work Program Inclusion
Secretariat Comment at PIF/Work Program Inclusion 4/19/22:
4/19/22:
4/19/22: Yes.
4/19/22: Yes. 3/3/22:

6. Are the project's/program's indicative targeted contributions to global environmental benefits (measured through core

indicators) reasonable and achievable? Or for adaptation benefits?

Secretariat Comment at PIF/Work Program Inclusion

5/10/22:

Cleared, thank you for the additional discussion on climate risks in the SRIF.

4/19/22:

Not yet. It is important that the GEF deliver sustainable solutions that can cope with anticipated climate change impacts—especially through its adaptation portfolio. For example, if storm surge heights eventually increase to a point where saline water enters the pulaka pits, the effort of this project will be in vain (we assume the pulaka pits are intended for use by communities beyond the 4 years of duration of this project). Thus, we request a screening or assessment of potential climate risk to this project, given projected climate change including sea level rise.

3/3/22:

Not yet.

The information provided discusses the proposed solutions in the context of the saline intrusion experienced thus far. It does not discuss whether and how the proposed solutions will deliver adequate adaptation solutions in the context of future, continued climate change and associated sea level rise and potentially higher storm surge events. Please discuss.

Agency Response

5/4/22

We developed the climate risk screening in the SRIF and explained how the project strategy addresses those risks. Kindly refer to the revised SRIF.

Response08/04/2022

Please note for programming under the LDCF, this Fund is to address urgent and immediate adaptation needs of vulnerable communities. This concept addresses those needs. It is fully aligned with national adaptation priorities and is therefore fully supported by national stakeholders. In consultation with country representatives and regional experts, the proposed project's solutions have been noted to be the most effective adaptation tools in the context of Tuvalu's extreme vulnerability to the future impacts of SLR.

7. Is there potential for innovation, sustainability and scaling up in this project?

3/3/22: The project has a scalable approach.
Agency Response
Project/Program Map and Coordinates
Is there a preliminary geo-reference to the project's/program's intended location?
Secretariat Comment at PIF/Work Program Inclusion Yes.
Agency Response
Stakeholders
Does the PIF/PFD include indicative information on Stakeholders engagement to date? If not, is the justification provided appropriate? Does the PIF/PFD include information about the proposed means of future engagement?
Secretariat Comment at PIF/Work Program Inclusion 3/3/22:
Yes for PIF stage.
By CEO Endorsement: Please provide detailed information on the role of NGOs and civil society in project design and also implementation.

Agency Response

Response08/04/2022

Well noted. Role of local communities in design and implementation of the project, has been added to paragraphs 79 and 80 of the Coordination section. NGOs, CBOs and civil societies will be consulted during project design phase to define role of NGOs and civil society. The information will be provided in CEO ER.

Gender Equality and Women's Empowerment

Is the articulation of gender context and indicative information on the importance and need to promote gender equality and the empowerment of women, adequate?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared.

3/3/22:

- a) Please clarify whether the project will develop and submit a Gender Action Plan by CEO Endorsement.
- b) Please include analysis and measures specific to, or which contribute to, building resilience to climate change impacts.

Agency Response

Response08/04/2022

- a) Yes, a Gender Action Plan will be developed as part of the PPG phase. This information has been included in paragraph 75.
- b) Thank you for the comment. Specific measures that contribute to building resilience to climate change impacts have been added to paragraph 74 in the gender equality and women's empowerment section.

Private Sector Engagement

Is the case made for private sector engagement consistent with the proposed approach?

Secretariat Comment at PIF/Work Program Inclusion

3/3/22:

Cleared. This project does not focus on the private sector.

Agency Response

Risks to Achieving Project Objectives

Does the project/program consider potential major risks, including the consequences of climate change, that might prevent the project objectives from being achieved or may be resulting from project/program implementation, and propose measures that address these risks to be further developed during the project design?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared. However, please see comments in section on Environmental and Social safeguards, below.

3/3/22:

Thank you for including potential risks posed by Covid-19 in the risks table. Please also discuss how the project will contribute to green recovery in the wake of adverse impacts of Covid-19, including economic, etc, i.e., opportunities it provides.

Agency Response

Response08/04/2022

Thank you for this comment. Specifically, the interventions proposed aim to contribute towards strengthening food security and reducing Tuvalu's reliance on imported goods and food supplies. Improving food security in the country will increase the population's resilience to

extreme climate events, as well as external economic and health shocks. These details have been revised into the PIF under paragraph 46.

Coordination

Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined? Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared.

3/3/22:

Not yet. Please provide additional information on the institutional structure of the project. If feasible, explore the role of the local community as a key partner in designing and implementation of project to ensure ownership and long-term sustainability of the investment.

Agency Response

Response08/04/2022

Thank you for this comment. Additional information on the institutional structure of the project, as well as the role of local communities in design and implementation of the project, has been added to paragraphs 79 and 80 of the Coordination section.

Consistency with National Priorities

Has the project/program cited alignment with any of the recipient country's national strategies and plans or reports and assessments under relevant conventions?

Occupation Occupant at DIF/Mode December Indicates

Secretariat Comment at PIF/ Work Program inclusion

4/18/22:

Cleared.

3/3/22:

Further information is requested:

- a) Please demonstrate consistency with current climate change adaptation strategies/plans/reports for Tuvalu. While we understand that adaptation is a key and continuous priority, all of the examples provided appear outdated.
- b) Please point to current national strategic documents that clearly identify pulaka pit strengthening as an adaptation priority.

Agency Response

Response08/04/2022

The response in Paragraph 81

The project's goal of facilitating sustainable, climate-resilient pulaka production and reducing dependence on nutrient-poor imported staple foods will support the objectives of Tuvalu's National Strategy for Sustainable Development (2021–2030), which advocates for a 'healthier people'. The project also supports the goals of Tuvalu's National Climate Change Policy (2021–2030) which prioritise addressing the adaptation challenges facing traditional crops such as pulaka — particularly the challenges of saltwater intrusion, coastal flooding and prolonged dry periods. A priority action of the policy is to invest in and support innovative farming practices and planting of climate-resilient crop varieties that are appropriate for Tuvalu's conditions to enhance household food security and climate-resilient agricultural practices in the country. Additionally, pulaka's ability to withstand cyclones in combination with an increased resilience to saltwater will support Tuvalu's National Adaptation Plan of Action (2007), which identifies several adaptation strategies targeted for alleviating the most prevalent impacts of climate change in Tuvalu, including the reduction of pulaka pit salinisation as a result of saltwater intrusion.

Knowledge Management

Is the proposed "knowledge management (KM) approach" in line with GEF requirements to foster learning and sharing from relevant projects/programs, initiatives and evaluations; and contribute to the project's/program's overall impact and sustainability?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared.

3/3/22:

Further information is requested. Will lessons learned or adaptation techniques from this project be shared with other islands facing the same issue?

Agency Response

Response08/04/2022

Thank you. Yes, the lessons learned and best practices from the proposed project will be shared with other SIDS and islands in the Pacific Region where the same problems are encountered. This has been clarified and expanded in the Knowledge Management and Scalability sections under para 94.

Environmental and Social Safeguard (ESS)

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

Secretariat Comment at PIF/Work Program Inclusion

5/10/22:

Cleared. Thank you for the responses (at the very bottom of the agency response section), and for the updated SRIF.

4/22/22:

Not yet.

- a) In order to be a sound adaptation project, it is essential that the project aims to cope with and continue to deliver benefits to communities amid changing climatic conditions, to the extent these can be projected. Please include in the SRIF a consideration of climate change risks to the project (not only from current climate variability but also projected climate change, including sea level rise), and how these will be mitigated. This screening/analysis is recommended by STAP for all GEF projects.
- b) We suggest that the agency develop concrete steps and process to engage and consult with vulnerable communities and indigenous peoples during the PPG stage to fully integrate their perspective into the project design and implementation including their traditional and local knowledge,
- c) We suggest that the agency develop a concrete plan to develop assessment of socioeconomic, environmental and climate change risks impacts, and indigenous peoples plan (IPP) during PPG or first year of the project implementation, and

d) Please add a summary of assessment results and actions that will be taken during the PPG and early stage of the project implementation in the ESS section of the Portal.

e) In the Safeguard Risk Identification Form (SRIF), the agency safeguard team states that "Considering its rapid population increase, worsening water and land and contamination issue, the project would require assessment of socioeconomic, environmental and climate change risks impacts and reflect them in the ESMP. Considering the presence of indigenous local communities, IPP (or well-developed stakeholder engagement plan) is also required." It is, however, not clear from PIF nor Safeguard Risk Identification Form (SRIF) whether the project is planning to develop ESMP and IPP during PPG or first year of the project implementation. Please clarify.

3/3/22:

The SRIF has been provided. However, further information is requested related to the climate risk screening, namely, what would be the impact of <u>continued</u> climate change and sea level rise on the project and its intended benefits? Will the proposed measures be able to withstand further changes?

Agency Response

5/4/22

We developed the climate risk screening in the SRIF and explained how the project strategy addresses those risks. Kindly refer to the revised SRIF.

Response 08/04/2022

Please note for programming under the LDCF, this Fund is to address urgent and immediate adaptation needs of vulnerable communities. This concept addresses those needs. It is fully aligned with national adaptation priorities and is therefore fully supported by national stakeholders. In consultation with country representatives and regional experts, the proposed project's solutions have been noted to be the most effective adaptation tools in the context of Tuvalu's extreme vulnerability to the future impacts of SLR.

7. Is there potential for innovation, sustainability and scaling up in this project? Secretariat Comment at PIF/Work Program Inclusion 3/3/22:

The project has a scalable approach.

Agency Response

Project/Program Map and Coordinates

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Agency Response

Stakeholders

Does the PIF/PFD include indicative information on Stakeholders engagement to date? If not, is the justification provided appropriate? Does the PIF/PFD include information about the proposed means of future engagement?

Secretariat Comment at PIF/Work Program Inclusion

3/3/22:

Yes for PIF stage.

By CEO Endorsement: Please provide detailed information on the role of NGOs and civil society in project design and also implementation.

Agency Response

Response08/04/2022

Well noted. Role of local communities in design and implementation of the project, has been added to paragraphs 79 and 80 of the Coordination section. NGOs, CBOs and civil societies will be consulted during project design phase to define role of NGOs and civil society. The information will be provided in CEO ER.

Gender Equality and Women's Empowerment

Is the articulation of gender context and indicative information on the importance and need to promote gender equality and the empowerment of women, adequate?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared.

3/3/22:

- a) Please clarify whether the project will develop and submit a Gender Action Plan by CEO Endorsement.
- b) Please include analysis and measures specific to, or which contribute to, building resilience to climate change impacts.

Agency Response

Response08/04/2022

- a) Yes, a Gender Action Plan will be developed as part of the PPG phase. This information has been included in paragraph 75.
- b) Thank you for the comment. Specific measures that contribute to building resilience to climate change impacts have been added to paragraph 74 in the gender equality and women's empowerment section.

Private Sector Engagement

Is the case made for private sector engagement consistent with the proposed approach? Secretariat Comment at PIF/Work Program Inclusion

3/3/22:

Cleared. This project does not focus on the private sector.

Agency Response

Risks to Achieving Project Objectives

Does the project/program consider potential major risks, including the consequences of climate change, that might prevent the project objectives from being achieved or may be resulting from project/program implementation, and propose measures that address these risks to be further developed during the project design?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared. However, please see comments in section on Environmental and Social safeguards, below.

3/3/22:

Thank you for including potential risks posed by Covid-19 in the risks table. Please also discuss how the project will contribute to green recovery in the wake of adverse impacts of Covid-19, including economic, etc, i.e., opportunities it provides.

Agency Response

Response08/04/2022

Thank you for this comment. Specifically, the interventions proposed aim to contribute towards strengthening food security and reducing Tuvalu's reliance on imported goods and food supplies. Improving food security in the country will increase the population's resilience to extreme climate events, as well as external economic and health shocks. These details have been revised into the PIF under paragraph 46.

Coordination

Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined? Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared.

3/3/22:

Not yet. Please provide additional information on the institutional structure of the project. If feasible, explore the role of the local community as a key partner in designing and implementation of project to ensure ownership and long-term sustainability of the investment.

Agency Response

Response08/04/2022

Thank you for this comment. Additional information on the institutional structure of the project, as well as the role of local communities in design and implementation of the project, has been added to paragraphs 79 and 80 of the Coordination section.

Consistency with National Priorities

Has the project/program cited alignment with any of the recipient country's national strategies and plans or reports and assessments under relevant conventions?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared.

3/3/22:

Further information is requested:

- a) Please demonstrate consistency with current climate change adaptation strategies/plans/reports for Tuvalu. While we understand that adaptation is a key and continuous priority, all of the examples provided appear outdated.
- b) Please point to current national strategic documents that clearly identify pulaka pit strengthening as an adaptation priority.

Agency Response

Response08/04/2022

The response in Paragraph 81

The project's goal of facilitating sustainable, climate-resilient pulaka production and reducing dependence on nutrient-poor imported staple foods will support the objectives of Tuvalu's National Strategy for Sustainable Development (2021–2030), which advocates for a 'healthier people'. The project also supports the goals of Tuvalu's National Climate Change Policy (2021–2030) which prioritise addressing the adaptation challenges facing traditional crops such as pulaka — particularly the challenges of saltwater intrusion, coastal flooding and prolonged dry periods. A priority action of the policy is to invest in and support innovative farming practices and planting of climate-resilient crop varieties that are appropriate for Tuvalu's conditions to enhance household food security and climate-resilient agricultural practices in the country. Additionally, pulaka's ability to withstand cyclones in combination with an increased resilience to saltwater will support Tuvalu's National Adaptation Plan of Action (2007), which identifies several adaptation strategies targeted for alleviating the most prevalent impacts of climate change in Tuvalu, including the reduction of pulaka pit salinisation as a result of saltwater intrusion.

Knowledge Management

Is the proposed "knowledge management (KM) approach" in line with GEF requirements to foster learning and sharing from relevant projects/programs, initiatives and evaluations; and contribute to the project's/program's overall impact and sustainability?

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

Cleared.

3/3/22:

Further information is requested. Will lessons learned or adaptation techniques from this project be shared with other islands facing the same issue?

Agency Response

Response08/04/2022

Thank you. Yes, the lessons learned and best practices from the proposed project will be shared with other SIDS and islands in the Pacific Region where the same problems are encountered. This has been clarified and expanded in the Knowledge Management and Scalability sections under para 94.

Environmental and Social Safeguard (ESS)

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

Secretariat Comment at PIF/Work Program Inclusion 4/22/22:

Not yet.

- a) In order to be a sound adaptation project, it is essential that the project aims to cope with and continue to deliver benefits to communities amid changing climatic conditions, to the extent these can be projected. Please include in the SRIF a consideration of climate change risks to the project (not only from current climate variability but also projected climate change, including sea level rise), and how these will be mitigated. This screening/analysis is recommended by STAP for all GEF projects.
- b) We suggest that the agency develop concrete steps and process to engage and consult with vulnerable communities and indigenous peoples during the PPG stage to fully integrate their perspective into the project design and implementation including their traditional and local knowledge,
- c) We suggest that the agency develop a concrete plan to develop assessment of socioeconomic, environmental and climate change risks impacts, and indigenous peoples plan (IPP) during PPG or first year of the project implementation, and
- d) Please add a summary of assessment results and actions that will be taken during the PPG and early stage of the project implementation in the ESS section of the Portal.
- e) In the Safeguard Risk Identification Form (SRIF), the agency safeguard team states that "Considering its rapid population increase, worsening water and land and contamination issue, the project would require assessment of socioeconomic, environmental and climate change risks impacts and reflect them in the ESMP. Considering the presence of indigenous local communities, IPP (or well-developed stakeholder engagement plan) is also required." It is, however, not clear from PIF nor Safeguard Risk Identification Form (SRIF) whether the project is planning to develop ESMP and IPP during PPG or first year of the project implementation. Please clarify.

3/3/22:

The SRIF has been provided. However, further information is requested related to the climate risk screening, namely, what would be the impact of <u>continued</u> climate change and sea level rise on the project and its intended benefits? Will the proposed measures be able to withstand further changes?

Agency Response

5/4/22:

- a) We have further developed the climate risk screening in the SRIF and explained how the project strategy addresses those risks. The environmental and social management plan developed during the PPG phase will ensure that infrastructure design, location, and materials used as well as the plant species mitigate against climate change risks. Kindly refer to the revised SRIF.
- b) Extensive stakeholder consultations will be done during PPG phase. Vulnerable communities and indigenous people will be engaged through surveys, interviews and focus group discussions to fully integrate their perspective
- c) The environmental and social management plan developed during the PPG phase will ensure that infrastructure design, location, and materials used as well as the plant species mitigate against climate change risks.
- d) Added in the ESS section of the portal: The environmental and social management plan and stakeholders' engagement plan will be prepared in PPG phase.
- e) An ESMP and IPP will be developed during the PPG phase. The PIF (para 70) and SRIF have been revised accordingly to reflect that these plans will both be prepared during the PPG phase.

Response08/04/2022

As noted in a previous response, CoP guidance for this Fund is to address urgent and immediate adaptation needs of vulnerable communities. At present, the proposed interventions have been identified by GoT and regional experts as the most suitable for combatting the continued impacts of climate change and sea level rise into the future.

art III - Country Endorsements

Has the project/program been endorsed by the country's GEF Operational Focal Point and has the name and position been checked against the GEF data base?

Secretariat Comment at PIF/Work Program Inclusion

5/10/22:

Cleared.

4/18/22:

No. The amounts specified in the letter exceed available LDCF resources for Tuvalu. The remaining \$5 million for Tuvalu needs to include all fees and PPG. Please revise and resubmit the LoE with correct figures, and with the tables adjusted accordingly.

3/3/22:

No, the OFP Endorsement letter has not yet been provided. Please upload this.

Agency Response

5/4/22:

The budget has been revised and the changes have been reflected in the relevant tables in the PIF. The total including fees and PPG is now \$5 million. The renewed LoE is uploaded in the portal with this submission.

Response08/04/2022

The OFP letter has been drawn up and submitted in portal. We have submitted again with the updated package.

Termsheet, reflow table and agency capacity in NGI Projects

Does the project provide sufficient detail in Annex A (indicative termsheet) 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 in Annex B to assess the project capacity of generating reflows? If not, please provide comments. After reading the questionnaire in Annex C, is the Partner Agency eligible to administer concessional finance? If not, please provide comments. Secretariat Comment at PIF/Work Program Inclusion n/a **Agency Response EFSEC DECISION** RECOMMENDATION Is the PIF/PFD recommended for technical clearance? Is the PPG (if requested) being recommended for clearance? Secretariat Comment at PIF/Work Program Inclusion 5/10/22: Yes. 4/19/22: Not yet. Please address the various review comments. 3/8/22: Not yet. Please address the various review comments.

ADDITIONAL COMMENTS

Additional recommendations to be considered by Agency at the time of CEO endorsement/approval.

Secretariat Comment at PIF/Work Program Inclusion

4/18/22:

- 1) Please provide information on how NGOs and civil society have been engaged in project design and details on how they will be engaged in project implementation.
- 2) Detailed information on the ecosystem-based adaptation measures that will be supported.
- 3) Detailed information on diversified and resilient livelihoods to be supported by the project.
- 4) In the eventuality that land-use for the pulaka pits changes over the decades and the plastic needs to eventually be removed, by CEO endorsement please do include a potential safe disposal plan, developed in consultation with the Government.
- 5) Please develop concrete steps and process to engage and consult with vulnerable communities and indigenous peoples during the PPG stage to fully integrate their perspective into the project design and implementation including their traditional and local knowledge.
- 6) Please develop a concrete plan to develop assessment of socioeconomic, environmental and climate change risks impacts, and indigenous peoples plan (IPP) during PPG or first year of the project implementation.
- 7) Please add a summary of assessment results and actions that will be taken during the PPG and early stage of the project implementation in the ESS section of the Portal.

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PIF Review	Agency Response
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First Review	3/10/2022	4/7/2022
Additional Review (as necessary)	4/19/2022	
Additional Review (as necessary)	5/10/2022	
Additional Review (as necessary)		
Additional Review (as necessary)		

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PIF Recommendation to CEO

Brief reasoning for recommendations to CEO for PIF Approval