



# Enhancing transboundary fisheries management in the Lower Mekong Basin

Review PIF and Make a recommendation

## Basic project information

**GEF ID**

11304

**Countries**

Regional (Cambodia, Lao PDR, Viet Nam)

**Project Name**

Enhancing transboundary fisheries management in the Lower Mekong Basin

**Agencies**

IUCN

**Date received by PM**

4/20/2023

**Review completed by PM**

11/29/2023

**Program Manager**

Astrid Hillers

**Focal Area**

Multi Focal Area

**Project Type**

## GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

### 1. General Project Information / Eligibility

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

b) Is the General Project Information table correctly populated?

### Secretariat's Comments

1. We fully support the MRC as the overall executing agency for the project. Please, in addition, add the national counterpart agencies.

2. The project is GEF eligible under the IW focal area but the focal are elements chosen need revision as this is a freshwater project and falls under objective 3. The STAR contributions are well noted and align with the project objectives.

(10/27/2023)

1. Addressed.

2. Addressed.

### Agency's Comments

**20 October, IUCN**

1. *We added the respective Departments of fisheries from all four lower Mekong Countries, which have been engaged in designing this PIF.*

2. We changed it to ?International Waters; Biodiversity/Land Degradation? (BD and LD because of the STAR allocations). |

### 2. Project Summary

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

#### Secretariat's Comments

No, the summary needs to **concisely** summarize the objective of the project, the key problems and strategies or strategic choices envisioned to address these, GEBs and expected outcomes. In essence it should summarize the project logic and outcomes. Aim for about 1/2 page.

Currently the summary is a mix of background and context and a simple list of components.

(10/27/2023)

Thank you for revising this. Addressed.

#### Agency's Comments

**20 October, IUCN**

Many thanks for pointing out these gaps. We revised the summary accordingly.

#### **3 Indicative Project Overview**

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

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

#### Secretariat's Comments

1. Please make the PDO more clear and measurable. It needs to state clearly what the project aims to achieve and be stated such that the end of the project it can be assessed if the objective was achieved. Wording like "strengthening of" etc. are very vague. What constitutes project success?

Component 1:

2. Please spell out SBEM and all acronyms in the table and elsewhere when used the first time.

3. is there a reason that the component title just generally points to 'freshwater ecosystems' and does not mention fish migration routes or refer to key fish habitats?

4, Subcomponent 1.3 and 1.4 need a critical look and reference to similar efforts to provide confidence that the ambition of what is outlined fits the USD 1 mill GEF grant budget of component 1 (unless there would be cash /on-budget co-finance that explicitly will be available to the project). These sub-components alone cover seemingly too large of an array of items - design of low head swim ways. determine minimum flows (by the way: do you mean min environmental flows or plain determination of average monthly low flows?); sediment dynamics, flood friendly crops (what about it?), analyzing land use changes, strategic impact assessment (of what?) and policy recommendations that optimize energy-food trade-offs and their impacts on gender.

Either this is somewhat overambitious or a significant part has been done already which this effort will build on and what is suggested is just a modification, extension or update of existing analyses, assessment and based on existing data and modeling tools and cross-sector and cross-country dialogues. Please comment or address here and in more detail in the project description when resubmitting.

5. Please also note that the outcome indicators provided here are more limited and do not correspond to what the sub-components aims to do. Please align.

Component 2:

6. Please use No./# and SIZE (ha) as indicator for the fish conservation and protection areas to provide are more meaningful indicator.

7. What is meant with "Increases" of fisheries value chains here? Not clear.

Component 3:

8. Regional agreement on ?

Component 4:

9. Gender mainstreaming: A separate component to address gender mainstreaming means often that gender is not truly mainstreamed in the project design. Why is this a separate effort and what will be achieved beyond the required mainstreaming of gender dimensions throughout project design (i.e. during the PPG phase, not only after)?

10 Note: Gender Action Plan: the project level/project specific gender action plan obviously has to be developed during PPG. Please confirm that there is a common understanding.

11. **IW:Learn:** Please add participation in IW Conferences and relevant regional and thematic w-shops.

12. Please 4.5 - Project Monitoring systems into the M&E budget line. Please also add estimated funds for MTRs and TEs.

13. Please assure that the grant to co-finance ratio is maintained constant/ is the same compared to the PMC to PMC-co-finance ratio.

(10/27/2023)

1. Addressed.

2. No need to delete it . The ask was just to spell out acronyms. Addressed.

3. Addressed.

4. and 5. Addressed.

6. and 7. Addressed.

8. Addressed.

9. Agree.

10. Thanks for confirming the development of a Gender Action Plan during the PPG/project design phase.

11. Addressed.

**12. Please move the M&E system incl MTR and TE in the budget line labeled "Monitoring and Evaluation" in the template and assign a \$ budget to this line.**

**I.e.** While there is an output on M&E, the GEF-8 Indicative Project Overview table has a complete component for M&E (see below) ? please include the M&E parts (outputs ? outcomes ? GEF resources, among others) in the M&E component.

13. On the PMC Proportionality: there is not proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 5%, for a co-financing of \$83,000,000 the expected contribution to PMC must be around \$4,150,000 instead of \$2,600,000 (which is 3.1%). As the costs associated with the project management must be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution and the co-financing contribution must be proportional, which means that the GEF contribution to PMC might be decreased and the co-financing contribution to PMC

might be increased to reach a similar level. Please ask the Agency to amend either by increasing the co-financing portion and/or by reducing the GEF portion. A more definitive estimation of PMC will be presented and adjusted at CEO Endorsement stage.

(11/26/2023)

1.-11. Previously addressed.

12. M&E - Addressed in moving the M&E output and budget, but please move back the other outputs e.g. incl. the stakeholder consultation and knowledge management outputs. These should not be within M&E but have these outputs remain in the components (incl [IW:LEARN](#), etc.). Apologies for any misunderstanding.

At the moment, because outreach events, KM and learning exchanges have been folded into the ME outputs and budget, the M&E budget of \$700,488 is equivalent to 6.9% of sub-total project cost which is above the recommended threshold of 2% for projects of similar size. Please address by moving non M&E related outputs back into project components .

13. Addressed.

(11/29/2023)

12. Comment has been addressed. all other comments previously addressed.

Cleared.

### Agency's Comments 29 November IUCN

**12 and 13.** As advised, the 3 knowledge management and IW Learn outputs have been reinstated back in Outcome 4 while the only one M&E output is retained in the M&E section. Kindly note that the M&E budget has been reduced downwards to USD 200, 000. The changes in the uploaded word version of the PIF are highlighted in green.

### 21 Nov, IUCN

12. As requested we have moved the M&E system including MTR and TE to the M&E section

13. As advised, we have changed the cofinancing for PMC to be proportionate to the GEF contribution

## 20 October, IUCN

1. Thanks for this suggestion. We changed the project objective to: 'Maintaining river integrity, fish stocks and biodiversity at 2020 levels to sustain livelihoods and food security?'
2. We deleted the reference to SBEM (MRC's Mekong Strategy for Basin-wide Environmental Management for Environmental Assets of Regional Importance)
3. We changed the component title to: 'Develop the knowledge base for the protection and restoration of regionally important fish habitats and migration routes?.'
4. We changed the Output titles:  
  
Output 1.3:  
Review existing knowledge related to low-head swimways and minimum flows, and design solutions that enhance fish habitats and connectivity  
  
Output 1.4:  
Nexus assessments for identifying synergies and trade-offs between WEF sectors at national and regional level, and policy recommendations for integrating fisheries in other sectors and for improving gender equality impacts.
5. Thanks for pointing this out. We revised outcome indicators accordingly.
6. We added hectares as part of the indicator.
7. We changed the indicator to: 'No. of initiatives to increase investments in fisheries value chains?.'
8. We changed the Outcome to: 'Fisheries governance and other relevant policies and plans harmonised to support transboundary fisheries management in LMB and regional agreement on fish stock management submitted for approval by LMB countries?.'
9. We deleted the gender-focused Output and strengthened the integration of gender across all other components.
10. Yes, we confirm that a gender action plan will be developed during the PPG phase.
11. We changed it to: 'No. of attendances at IW Conferences and relevant regional and thematic workshops?.'
12. We added a new output: 'Project monitoring system established (incl. MTR and TE)?.'
13. We increased the co-financing for the PMC to \$2.6 million.

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

Secretariat's Comments

Please see comments above re mainstreaming of gender, gender action plans to be prepared during project design and comment on budget for component 1 and on PMC to co-finance ratio.

(10/27/2023)

Yes, addressed.

Agency's Comments

**20 October, IUCN**

We made these changes as requested.

**3.3 a) Are the components adequately funded?**

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

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

Secretariat's Comments

1. Please assure that the grant to co-finance ration is maintained constant/ is the same compared to the PMC to PMC-co-finance ratio.

In other words: PMC is not proportionate between GEF financing and co-financing. Please consider to adjust PMC budget allocation accordingly for equal burden sharing.

1. Addressed (and even exceeded).

(11/26/2023)

Addressed.



## Agency's Comments

20 October, IUCN

We increased the co-financing for the PMC to \$2.6 million.

### 4 Project Outline

#### A. Project Rationale

##### 4.1 SITUATION ANALYSIS

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

**b) Are the key barriers and enablers identified?**

#### Secretariat's Comments

1. Please overall streamline the project rationale (situation analysis and justification section) and make it much more succinct and clear, Please use the tool tips provided as guidance. The recommended length to aim for is up to 5 pages (this is not firm, but *roughly*) and focus on the relevant elements pertinent to outlining the current situation incl. key environmental problems from a systems perspective, why this project approach has been selected over others, how it is resilient to future scenarios/changes, and how it builds on experiences and lessons learned in the countries and the region. It should also include the roles of key stakeholders (incl. gender dimensions, private sector and civil society key players).

2. There are somewhat inconsistent statements on the flood pulse and the river bed - it may need some data from existing studies to clear up the statement that this is intact versus the described impacts of current and planned dams, change in the sediment regime and impacts of sand mining.

3. All countries are said to have regulations on fisheries; how comprehensive and effective are these including their enforcement of these regulations? Are the policy inconsistencies on national (not only regional) level that the project would need to address to address the trade-offs between infrastructure on the river, irrigation design and expansion, aquaculture and ecosystems management and for the delta sand-mining. If there is no policy coherence and awareness of trade-offs on national level it is hard to see this being tackled top-down from regional to national only. Please comment and address in project design as needed.

4. How is aquaculture figuring into the larger picture of fisheries in the LMCs ?
5. Thank you for the maps in the background /situation analysis. These are very useful.
6. The first para under Figure 2 (starting with "Experts predict...") talks about the reduction of fisheries including possibly from the existing mainstem dams. Please provide some evidence or references (from studies and/or data on decline of fisheries). Ditto for the statement on fisheries decline under Root cause #2.
7. Further, the next para states that fish by-pass efforts "have never been successful on dams in large tropical rivers". This statement is not supported by any reference. In addition, please provide some initial findings of the current studies to evaluate the effectiveness on the existing fish bypass structures of the existing Mekong dams and especially the two main stream dams. These studies are also briefly mentioned later in the para below Box 1.
8. IUU is mentioned among the root causes. How large is that problem and how will the project address it ?
9. Please explain the statement under root cause #5: "Transboundary cooperation on water management exists, but is mostly on the national level, ..." There may be a typo (?)
10. Barriers:
  - Please be clearer on the gap in legal and institutional frameworks with regards to water and fisheries management on national levels and to lateron build on this and point to how the project will address these gaps and cross-sector inconsistencies.
11. Please describe key stakeholders on national level that are expected (at this point i.e. at PIF stage; this will be indicative only) to be major players for the success of this project and why (including national agencies, different population groups, key private sector players or groups, and/or other civil society organizations).

(10/27/2023)

1. Thanks for a substantial editing effort, which very much aided the readability and clarity of the text. (i) Please integrate a bit more differentiated attention to key stakeholder groups and gender dimensions in the fisheries sector (catch, processing, marketing usually differ substantially in the gender roles/% of women in each); (ii) Table 1 showing the impact of hydropower on fisheries is cited but I do not see it/forgotten to add.
2. Addressed.

3. The weakness of enforcement of existing policies is very much acknowledged, yet the project description (component 3) isn't very explicit in the strengthening these capacities which at the same time aid in curbing IUU.

4. Noted. Nevertheless, could you please provide approximate numbers of average annual fish yield (in tons) and revenue from aquaculture (fish and shrimp)? This would aid to give a comparative idea of interests in capture fisheries versus aquaculture. What are the main markets for capture fisheries and aquaculture in terms of local, regional and international export markets?

5. No Answer needed.

6. Thank you for adding references on the impacts of dams on fisheries. For the second, decline of fisheries: the period of observation of the cited report is from 2018 - 2022. This is of course a short time frame and other climatic events could influence yields over a four year period. Are there data that span a longer time (e.g. couple of decades, including pre- and post major incl mainstream dams)?

7. Addressed.

8. See comment 3 above re. component 3 being more explicit to enhance enforcement capacities.

9. Noted and addressed.

10. Same as above on addressing weakness of enforcement on local and national levels.

11. The mentioning of government agencies is noted and appreciated. What are other key stakeholder groups (see initial comment) ? e.g. local fisheries associations and coops (if there are); role of community groups (including roles of women) and private sector players involved in post harvest processing, storage and marketing, local universities or other that may be involved in fish stock assessments ?? these are just examples and not all prescriptive. But please highlight the role of key stakeholder groups outside government and why they will be important to address in the 'solution space' of the project, which will then be expanded on in the project description.

(11/26/2023)

1. Additions with regard to specific stakeholders are well noted. Please note that on gender dimensions in the fisheries sector it appears rather misleading and undifferentiated to qualify women's work as "light" compared to men's work. Please revisit ("...women focus on light work...").

2. addressed previously

3. The question was on the need to strengthen enforcement of existing fisheries policies and regulations and curbing IUU (e.g. including illegal fishing methods) and whether the project should address this as a problem. This is not quite addressed in the agency response.

4. Addressed

5. No answer needed.

6. Explanation noted. Addressed at PIF stage. More data may become available in PPG phase.

7. and 9. Previously addressed.

8. and 10. See comment 3 above.

11. Addressed at PIF stage. More detail on this to be explored during project design.

(11/29/2023)

The remaining two comments have been addressed.

### Agency's Comments

**29 November, IUCN**

1. This is now included in the project rationale section with the new paragraph reading as follows and highlighted in green in the uploaded revised PIF:

*Balanced, equitable and sustainable development of the fisheries sector must take all social groups into account. MRC study show that women are an integral and important part of the fisheries? workforce, and the contribution they make is significant. For example, when men go fishing, women often accompany them to remove fish from nets or go fishing by themselves in shallow water. Women are also usually responsible for repairing nets and other fishing gear, manage fish processing and selling, and manage household finances including saving and loans. Recognizing the important of women in fisheries sector, the network for the Promotion of Gender in Fisheries development in the Mekong Basin (NGF) was established in 1999 including representatives in each of the four riparian countries. The network aimed to raise and promote women?s issues in fisheries through training, capacity development and dissemination of information. The NGF is no longer active but holds lessons to guide future gender-sensitive interventions in the fisheries sector.*

3. There is universal agreement among the MCs that basing the management of capture fisheries activities and effort on a centralised (top-down) regulatory approach is not fully effective. Co-management as the alternative, or supplementary, approach is recognised in the policies of all four MCs. All MCs also have experience with co-management, some successful some less so, but all relevant and useful.

We added text ?Strengthening crackdown of illegal fishing activities through community-led initiative or co-management for patrol/surveillance activities?, which is highlighted in green in the uploaded revised PIF, under the ***Output 2.6: Strengthen community-led fisheries management and enforcement initiatives, including incentives for app-based monitoring*** to make it clear.

## **21 November, IUCN**

1. We revised the sections to be more focused and to be clearer about the rationale. We added text for gender dimension in fisheries sector in the LMB

3. Most LMB countries have sound policies for capture fisheries, often accompanied by action plans. But enforcement is typically weak primarily because smallholder fishers are not a political (or economic) priority. While there is no explicit policy prioritising aquaculture over capture fisheries in any LMB country, aquaculture is prioritised over capture fisheries in terms of investment and attention. All four MRC member countries recognise significant failings in the current management approach for capture fisheries, which is contributing to the further decline of fish stocks. One of the key reasons is inaccurate information, particularly catch statistics, which lead to wrong policy and management measures. Due to the transboundary movement of aquatic organisms, assessments of transboundary and cumulative fisheries impacts must be made at the LMB scale and require consensus between the countries, which is under the mandate of the MRCS as the regional coordinator for the process.

4. Aquaculture is not a focus of this project but semi-natural (or semi-wild) aquaculture (e.g., rice-fish in the Mekong Delta, cage farming in the Tonle Sap) will be explored where ecosystem impacts are positive. We added text in the PIF to highlight the important of capture fisheries vs aquaculture in the LMB and their import/export market.

6. We added a reference to the reported decline in fish catch between 2015 and 2020. 2015 is a relevant baseline because the Lancang hydropower dam cascade was completed in 2017, since when we have seen major changes in Mekong hydrology, particularly shorter and more erratic wet season flows with direct impacts on fish catch.

7. We revised the statement to: Fish ladders are being constructed to allow fish to bypass barriers, but Australian supported research on the Xayaburi dam shows no evidence that fish passages work effectively. We also added a reference:

Connor, Justin, Robin Hale, Martin Mallen-Cooper, Steven J. Cooke, and Ivor Stuart. 2022. "Developing Performance Standards in Fish Passage: Integrating Ecology, Engineering and Socio-Economics." *Ecological Engineering* 182 (September): 106732. <https://doi.org/10.1016/j.ecoleng.2022.106732>.

8. While IUU is an issue, it has been dwarfed by the impacts of hydropower development on fish stocks.

9. Many thanks for pointing out this mistake. We changed the statement to: Transboundary cooperation on water management exists (see baseline) but has not yet led to management frameworks for sustainable fisheries.

10. We added the following statement: National fisheries laws exist but enforcement is often very weak. In addition, fisheries laws focus on fish management only overlooking the aquatic ecosystem. Also, nearly all public investment in fisheries goes into aquaculture, while smallholder fishers are largely neglected.

11. We added to this paragraph the following: Key government stakeholders include Departments of Fisheries from all four LMB countries as well as the Ministries focused on managing the Environments and Ministries focussed on rural development. Text on the role of international and local NGOs in strengthening fisheries management, particularly in Cambodia and Lao PDR, is also added.

## **20 October, IUCN**

1. We revised the sections to be more focused and to be clearer about the rationale.

2. Thanks for pointing this out. We added some data from recent studies.

3. Most LMB countries have sound policies for capture fisheries, usually accompanied by action plans. However, enforcement is often weak as actions either missing or inadequately funded. In addition, while there is no explicit policy prioritising aquaculture over capture fisheries (at the level of overarching national policy) in any LMB country, aquaculture is in practice prioritised over capture fisheries in terms of investment and attention. All four MRC member countries recognise significant failings in the current management approach for capture fisheries in the LMB, which is contributing to the further decline of fish stocks. One of the key underlined reasons is inaccurate information,

particularly catch statistics, which lead to wrong policy and management measures. Due to the transboundary movement of aquatic organisms, assessments of transboundary and cumulative fisheries impacts have to be made at the LMB scale and require consensus between the countries, which is under the mandate of the MRCS as the regional coordinator for the process.

4. Aquaculture will not be a focus of this project but semi-natural aquaculture (e.g., rice-fish in the Delta, cage farming in the Tonle Sap) will be explored in certain areas where ecosystem impacts are positive.

5. Noted.

6. We added the requested references.

7. We revised the statement to: Fish ladders are being constructed to allow fish to bypass barriers, but Australian supported research on the Xayaburi dam shows no evidence that fish passages work effectively. We also added a reference:

O'Connor, Justin, Robin Hale, Martin Mallen-Cooper, Steven J. Cooke, and Ivor Stuart. 2022. "Developing Performance Standards in Fish Passage: Integrating Ecology, Engineering and Socio-Economics." *Ecological Engineering* 182 (September): 106732. <https://doi.org/10.1016/j.ecoleng.2022.106732>.

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10. We added the following statement: National fisheries laws exist but enforcement is often very weak. In addition, fisheries laws focus on fish management only overlooking the aquatic ecosystem. Also, nearly all public investment in fisheries goes into aquaculture, while smallholder fishers are largely neglected.

11. We added to this paragraph the following: Key government stakeholders include Departments of Fisheries from all four LMB countries as well as the Ministries focused on managing the Environments and Ministries focussed on rural development.

#### **4.2 JUSTIFICATION FOR PROJECT**

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

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

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

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

**Secretariat's Comments**

1. Please overall streamline the project rationale and justification section and use the tool tips provided as guidance. The recommended (not firm) guidance is to aim for 3 - 5 pages and focus more concisely on the information relevant to the problem and the project on regional and national levels.

2. Please consider moving the table of past, ongoing and planned projects into an annex. Instead in the text distill both lessons learned and institutional structures on regional, national and local levels to build on (what worked and why; same for what did not) and achievements to build on as well as coordination needs and opportunities with ongoing and planned efforts.

3. Among the past projects that stick out for *example*:

- The Wonders of the Mekong project - what has been learned on fish biodiversity, habitats etc. as well as training done

- MRC Guidelines for fish friendly irrigation schemes which includes fishway design for low level weirs

- MRC fisheries assessment on the landscape level (2021-23)

- FishTech: Integrating technical fisheries solutions into river development programs across SE Asia

- The Viet Nam Delta study

- the Guidelines on Transboundary fisheries management in the LMB (2020-2021)

- MRC Status and trends of wetlands

- Various MRC studies and SEAs on hydropower options, social atlas, sustainable HP etc.

4. Box 1: Please indicate what is part of the project and what is part of the larger MRC work and relation between the Mekong Fisheries Management Strategy and the BDS. Again, in case this is largely referring to a wider program it may be useful to move this to an Annex and refer to it with a focus on which points the project will address specifically. It would aid the readability of the project.

5. Development of ecological and environmental monitoring strategies (heading on page 24/62): As discussed with James Dalton (IUCN HQ) and Neil Cox (IUCN DC) they encouraged the use of eDNA and the project making links with this to the e-bioAtlas as a



great opportunity. It would be great to see this being built in the project outputs and MRC with IUCN to lead the way and share experiences with other basins.

6. How will the proposed project link and build on but not duplicate the two projects mentioned (pg 25 of 62) which are implemented by the MRC: (1) development of guidelines for transboundary fisheries management in the LMB and (2) formulation of technical guidelines for the restoration of key fish habitats (connectivity) with regional/transboundary importance in the LMB. Who is funding these and what is the timeline?

Please be specific in your answer. Annexing a table that correlates the proposed project with these other two project could be useful. Furthermore, please consider how these projects implemented by MRC can cost share /co-finance e.g. by some joint staff or common outputs.

7. There are four more projects mentioned below table 1 where linkages and cooperation could be clearer outlined already at PIF stage and possible collaboration/co-finance be possible to explore during PPG phase, namely with the CGIAR Nexus Gains effort, the WorldFish Cambodia rice field fisheries, the FishBio Guidelines for Fish Conservation Zones, and the WWF Free Flowing Rivers.

(10/27/2023)

1. Indeed - you did streamline the situation analysis, rational and justification so successfully that I am not sure I see a heading for a short "Justification" at all anymore : ) (??) Please address.

2. and 3. Annex is noted including the useful summary of findings/lesson learned.

4. Noted in Annex J. Please use different fonts or colors to highlight which of the list of activities are part of the proposed GEF project (they clearly are) and which is funded by others (maybe add source of funds and timeline/year). Adding a column with this info would be very useful and show relevant co-finance/programmatic and coordinated finance (if part of the co-finance table or not). (I note though that there will then be some duplication with Annex I/baseline projects).

5. Noted.

6. The Annex is noted but as the baseline is not mentioned in the text anymore I am not clear where these Annexes are referenced. Please add a para on coordination with main related projects and commit to exploring possible cost share/staff sharing with some of these during PPG. There seem to be very many synergies that need to be built on and by endorsement a programmatic schematic on how these initiatives complement and re-enforce each other will be expected.

7. Noted. These are efforts that this project will therefore be able to build on. Please reference/show at endorsement stage. Comment addressed at PIF stage.

(11/26/2023)

Comments addressed.

### Agency's Comments

#### **21 November, IUCN**

1: We added a paragraph with the headline Project Justification that brings the difference between the baseline future scenario and the intervention scenario to the point.

4: We added colour coding as requested.

6: The references to the Annex can be found in the last paragraph of Section A and in the first paragraph of Section B. The co-funding dimension should now be clearer after adding the colour coding of activities in the Annex.

#### **20 October, IUCN**

1. We restructured and shortened the overall Section as much as possible within the co-design process involving a range of stakeholders.

2. Thanks, we moved the table as suggested to the Annex (Annex H). We also added lessons learnt to Annex H to make links between past investments and the project justification.

3. We added text explaining lessons learnt from these projects.

4. We decided to shift Box 1, which lists activities approved as part of the MRC ?s BFMS and SBEM, into the Annex. Several of the activities listed will be funded by the MRC. The GEF funding will complement the implementation of BFMS and SBEM focused activities.

5. We added this aspect to 1.3.

6. We added Annex I with a table on baseline projects and their key activities, timeframes, and relevance for co-finance.

7. These four are broader initiatives, which will be largely concluded by the time the proposed project will start. Consequently, we did not list them as baseline projects.

## 5 B. Project Description

### 5.1 THEORY OF CHANGE

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

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

#### Secretariat's Comments

1. There is no clear Theory of Change narrative as such. Please have a look at the STAP primer to aid in a clearer half page PIF-level initial ToC.

<https://www.stapgef.org/resources/advisory-documents/theory-change-primer>

2 The ToC diagram is as is much a restatement of the Indicative Project overview table. In that ToC diagram please delete the side bar of the "IW indicator target" which do not aid the clarity of the ToC diagram. The intervention logic diagram does not aid much to the story and suggests that gender is actually not mainstreamed in the project design but an add on.

3. Please note that GEF is not a funding basic research and as written this is confusing. The entire text ahead of the project component description in a nutshell should describe the intervention logic to achieve an end outcome, alternatives considered and underpin the choices made for the suggested project design and should do so in a clear and concise manner (one page at max).

(just a comment: It feels/reads as if the project component description was written by another person as the components are much more clearly described).

All components - general comments:

- Please makes sure that gender considerations and attention to other key stakeholders and their roles (incl. private sector players; technical expertise in the countries or region, etc.) and vulnerable groups is mainstreamed in all relevant component descriptions.

- Please make sure that there are baselines established for all measures *during PPG* and provided in the results framework.

- GEF funds can be used to establish baselines, monitor species, trends over time and project impacts on these, etc. but not research perse.

- to be GEF IW eligible there is no need to focus actions on local trans-border locations unless based on science/need for action. The basin in its entirety is transboundary and many key fish species use the entire river (without using a passport to cross borders) to migrate, spawn, hatch, and grow making the effort on fisheries itself transboundary ; )

- Please during project design build in household surveys as indicators in monitoring efforts to e.g, assess trends in the use of fish for nutrition, income of project targeted households and groups (incl. e.g. representative samples of households dependent on fisheries and women involved in the project) and establish a baseline

#### Component 1:

5. As mentioned earlier in the review sheet, components 1.3. and 1.4. are possibly over-ambitious. Please do some cost/effort cross check with comparative efforts in the past of MRC (e.g. their HP Strategic Assessments) as well as the same for other basins. The WB multi-sector opportunity analysis methodology and applications (e.g for the Zambezi) may also be a useful parallel to look at.

#### Component 2:

6.. Please see earlier comments on clarifying links to ongoing and past work on fish passage design guidelines.

7. Three specific areas are mentioned for which a map should be provided (in geographic info section): Bikeo-Chang Rai, Champasak-Stung Treng and Prey Veng-Dong Thap.

8. Output 2.5. mentions the establishment of fish conservation areas. This and other measures will require for the project to develop a resettlement action framework *during the PPG/project design phase* to address compensation mechanisms for fisherfolks excluded or with reduces access and hence income. Locally accessible and appropriate grievance redress mechanisms are also essential to be included in this.

(note: did you really mean to say "to provide an overview of system change on a daily basis"?)

#### Component 3:

9. Please give a rough flavor of what type/scope of regional agreement is needed (to not leave this entirely vague)

10. Output 3.1. is essential and needs detailing in the project design/PPG phase, if governance of fisheries and cross-sector coherence is not achieved on sub-national and national levels there is little chance to move this on a regional scale.

11. Output 3.2. - See above. This needs to start on national level. Will the national Mekong Committees serve as THE intersectoral committees to push towards policy and

strategy coherence on national level or is there an need for another intersectoral mechanism? Would this differ between countries?

#### Component 4

12. Please explain what is meant with "external consultations". Who are these external stakeholders?

13. Please note also that stakeholder consultation plans have to be prepared during the project design/PPG phase; not after. Ditto for the Gender Action Plan. Gender considerations have to be built into the project component and output design from the start.

14. Please consider coordination and cooperation with [IW:LEARN](#) for dissemination of experiences and for exchanges with other river basins.

15. OUTPUT 4.5: Please explain and spell out what is meant with "A trusted international organisation will be selected to strengthen the transboundary process". Why is this not the MRC? Why is another organisation needed and for what purpose as "strengthen the transboundary process" is clearly a mandate of MRC and not any other organisation,

(10/30/2023)

General comments - on gender (see previous review): Gender (comment provided by Verona): Please see other comments provided across the review. In addition, please revise the references to "gender-disaggregated opportunities" to *gender-differentiated opportunities or opportunities tailored according to gender/sex*. (Output 2.2., 2.5); Include gender equality considerations in the following outputs: 2.6 , 3.1, 4.2.

1. The first para of the Theory of change should set out what the project aims to achieve and the pathways to get there as well as how this project will be durable in the face of predictable/likely future changes (e.g. climate change impacts; impacts from planned and recent infrastructure; other). The para is very generically referring to e.g. barriers and root causes, multi-disciplinary approaches, etc. Such generic language is not conducive to lay out the logic of the project and suggested approaches chosen or to be explored during project preparation. Please substantiate this and be specific.

2. Addressed.

3. Please briefly include which stakeholders groups are key to involve in project implementation for each pathway.

4. These were comments mainly for PGG. Noted and to be revisited ant endorsement stage.

5. Addressed.

6. Addressed.

7. Noted that the site selection is to be done in PPG.

8. Comment to be addressed during PPG. Please note that "resettlement" includes compensations required that /if these impact the use of an area or asset and impact the users (e.g. reduced incomes or other benefits because of use restrictions; etc. ) even if no physical resettlement is involved.

9., 10. and 11. Addressed and noted that more detail will be provided during PPG phase.

12. - 15. Comments on component 14. have been addressed.

(11/26/2023)

Comments sufficiently addressed at PIF stage. During project design/PPG more detail on the involvement local stakeholder groups needs to be provided.

#### Agency's Comments

**21 Nov, IUCN**

- We changed gender-disaggregated to gender-differentiated. Thanks for pointing this out.

- We also added clear commitments to gender equality to Outputs 2.6, 3.1, and 4.2,

1. We also added a paragraph at the beginning of the ToC covering goal and impact pathways.

3. We identified stakeholder and engagement approaches in the newly added paragraph.

**20 October, IUCN**

1. Initially we mapped the description of the ToC into the Component description. However, based on this comment we added a narrative for the ToC.

2. We deleted the sidebar as suggested. The gender approach was to have a centralised project unit that ensures that gender mainstreaming is happening throughout the project implementation phase. In no way do we see gender as an add-on. However, we deleted the centralised gender activity and strengthened gender foci of the individual outputs under Components 1-3.

3. We revised the wording to avoid any confusion. The proposed project will not include basic research.

4. We integrated gender as a cross-cutting focus into all relevant outputs.

5. We revised the wording to explain that this output will be focused to conduct a review of the listed range of topics, which is a realistic target.

6. We integrated text explaining the link to ongoing work on fish passages in various parts of the PIF, including Annex H.

7. After discussions with the MRC member countries we deleted the selection. Instead, the geographical focus will be specified during the PPG phase, if this PIF is successful.

8. None of the targeted actions will require resettlements. However, the team will focus on ESS-focused actions during the PPG phase.

9. We changed the focus of the agreement to 'Fisheries governance and other relevant policies and plans harmonised to support transboundary fisheries management in LMB countries and regional agreement on fish stock management submitted for approval by LMB countries?.'

10. The project will equally target the improvement of fisheries management at the national level. A more granular description will be developed during the PPG phase.

11. We fully agree that this needs to start at the national level. Formally, the NMCs cannot engage with all relevant sectors. Instead, the project will mainly link to Depts of Fisheries in all four LMB countries.

12. We added that this will be development partners, research agencies and similar types of stakeholder groups.

13. Noted, thanks.

14. Absolutely. Output 4.3 will ensure global engagement and cross-project learning through IW LEARN.

15. The initial intention was to keep the option open to add an international organisation if needed. But we deleted this reference.

## **5.2 INCREMENTAL/ADDITIONAL COST REASONING**

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

#### Secretariat's Comments

Please strengthen the incremental cost reasoning and the GEF policy alignment in cooperation and with feedback by the IUCN GEF coordination unit which will be able to provide some examples to build on.

(10/30/2023)

Comment addressed.

#### Agency's Comments

**20 October, IUCN**

Many thanks for pointing out the deficiencies in this response. We fully agree and we expanded on the answer with clear references to the baseline scenario. We will integrate the quantification of incremental benefits in the project's monitoring approach.

#### **5.3 IMPLEMENTATION FRAMEWORK**

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

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

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

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

#### Secretariat's Comments

1. See earlier comment in the review sheet: We fully support the MRC as the overall executing agency for the project. Please, in addition, add the national counterpart agencies and how implementation on the local levels is envisioned and using existing country based systems and extension agents.



2. Please see earlier comment to better outline the coordination and in some cases cooperation with related efforts,

3. KM: At endorsement stage, please more clearly describe knowledge management processes and products, communication products and channels and what target groups these are tailored for and a timeline for KM and communications product delivery.

4. While the project mentions the need for greater awareness on e.g. the fish- agricultural food - energy- ecosystems nexus, there is no clear enough effort for communication products and a communication strategy. Please strengthen the project description in that regard.

5. Please fill out the PIF section/questions on coordination and cooperation with ongoing initiatives.

(10/27/2023)

1. Addressed.

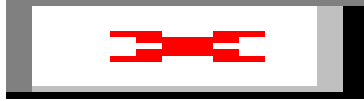
2. Noted, but you will need to provide text here ( and reference to Annex H). Annex H lists a large number of projects, their implementation periods and objectives which is very helpful. Same for the listed lessons learned from these that are being taken up by this project. What is missing is text in the main body of the PF identifying the most relevant of these or other projects for which closer cooperation and mechanisms for doing so will be identified during PPG/project design phase. These could be for example, regular (semi-annual or ??) meetings among related projects and/or back-to-back Steering committee meetings and/or a coordination group of all project managers at MRC OR ... any other mechanisms that prove both practical and beneficial.

3. Noted and doing so please keep the previous comment in mind. Please also refer to the new GEF Knowledge Management Strategy and its requirement that was approved at the Meeting of the GEF Council this month (October 10th, 2023).

Please also do not lump KM and Communications strategies. Both are needed but are very different.

4. It is strongly encouraged to formulate a communications strategy in the first years of the project. This could be built into component 4.

5.. Still to be done; see comment 2 above. In addition, please answer Yes or No to the question " Does the GEF Agency expect to play an execution role in this project?" and if Yes, please provide further explanation as required:



(11/26/2023)

2. Please add text on cooperation and coordination under the following heading in the PIF:

***"Coordination and Cooperation with Ongoing Initiatives and Project.***

.....

*If so, please describe that role here. Also, please add a short explanation to describe cooperation with ongoing initiatives and projects, including potential for co-location and/or sharing of expertise/staffing "*

3. - 5. Addressed.

(11/29/2023)

Comment addressed at PIF stage via the annexes provided.

Agency's Comments

**29 November, IUCN**

The following text has now been added in the relevant section and highlighted in green in the uploaded word version of the revised PIF:

*Baseline projects with the operational time frame from 2025-2030 are provided in Annex 1. All these projects will be executed by either IUCN, MRC, or MC fisheries agencies. Further details on cooperation with ongoing baseline projects to avoid duplication and increase synergies will be provided during PPG. Initial assessment of cooperation is project in Annex J.*

**21 Nov, IUCN**

2. We have added this in the project rationale section of the PIF
3. The wording was indeed clumsy and misleading. We revised the text to make a very clear distinction between KM and communication.
5. We have clarified that GEF agency will not play an execution function

## **20 October, IUCN**

1. At the national level Departments of Fisheries in the four LMB countries will be national counterpart agencies.
  2. We added Annex H to list relevant past, ongoing and planned activities and specified points of collaboration.
  3. We will develop a KM/communications strategy during the PPG phase.
  4. We strengthened the communications aspects of the projects, mainly through Component 4. Further details will be added during the PPG phase.
  5. We added Annex H to list relevant past, ongoing and planned activities and specified points of collaboration.
- 5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?**
- b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?**

### **Secretariat's Comments**

The Submitted PIF only shows values for core indicator 11/beneficiaries.

1. Please fill in the other indicators and sub-indicators as per GEF guidance. Funds are requested across a number of focal areas and all applicable CIs need to be filled in.

e.g. for BD: Please set core indicator targets for BD and at the very least if none are applicable given the scope, then concretely describe the intended BD GEBs (outside of the CI) that are expected. Currently there are only set targets for CI 11 on project beneficiaries.

2. The number of 20 000 direct beneficiaries appears very small for the project of this size and the scale of inland fisheries. Please explain how this was calculated.

(10/30/2023)

Noted.

1.

i.) Please confirm that the Siphandone Ramsar site is not in the WDPA database and does not fall under the IUCN criteria for protected areas. Both are not specified in the Core Indicator (CI) table.

ii.) Please fill in CI 7 including sub-indicators which was omitted in this version of the PIF (sure to be an inadvertent miss).

2. Noted.

3. Please also add an indicator for "tons of fisheries moved to more sustainable levels".

Details: The name of the fishery targeted, the source for the estimate of tonnage, and the initial justification for considering the fishery to be overexploited should be provided.

Type: Outcome Indicator | Unit: metric tons"

**Furthermore, at endorsement stage, please update the values and methodology on the target estimates for the CIs** as at that point the intervention sites will be known and targets can be more precisely determined.

(11/26/2023)

1. ii.0 Please consider revisiting the rating of "1" for state of the TDA and SAP. To my mind the various plans and strategies of the MRC on overall basin-level as well as specific to fisheries well correspond/are equivalent to aTDA and SAP.

3. Please provide name of the fishery (i.e. what type of fish)?

(11/29/2023)

1. Addressed.

3. Response noted and o.k. at PIF stage. More detail to be provided *at endorsement stage* e.g. including the targeted main fish species, including baseline and target values should be provided.

### Agency's Comments

**29 November, IUCN**

1. As advised, we have revisited the rating of 1 for state of the TDA and SAP and increased it to 4.

3. Kindly note that we have added text: *?Small scale, artisanal fisheries in the LMB moved to more sustainable levels?*, which is highlighted in green in the uploaded version of the revised PIF

1.i). We confirm that Siphandone is not in the WDPA database

1.ii) We apologise for inadvertently deleting the CI7 sub-indicators which are now reinstated

3. The concerned indicator is now added under Indicator 8

**20 October, IUCN**

1. We added targets for core indicators 1 and 4 (in addition to 7 and 11).

2. We decided at this stage to list only the *?direct?* beneficiaries resulting from Component 2.

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

Secretariat's Comments N/A

## Agency's Comments

### 5.6 RISKS

**a) Are climate risks and other main risks relevant to the project described and addressed within the project concept design?**

**b) Are the key risks that might affect the project preparation and implementation phases identified and adequately rated?**

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

### Secretariat's Comments

1. Climate risks: Please be more specific. What are the risks and what are strategies being considered to include CC in the project design.

2. Please summarize social and environmental risks and mitigation measures considered that are expected to be considered in project design.

3. Political and governance risks: how will the project e.g. address the limited coordination and trade-offs across various sectors within and across countries? Please expand.

4. Macro-economic: any shifts of the basin and regional economies that may impact fisheries and water related sectors?

5. Strategies and policies: the mitigation measures to not acknowledge or address policy and strategy incoherence across sectors and goals and interventions of the project to address these.

6. Technical design: please expand. Based on lessons learned what is informing the current project and how (in broad terms/summary)

7. Institutional capacity: (i) How is the MRC linking with national agencies on fisheries management and with regard to cross-sector dialogue on national level. (ii) How well will the project be embedded into national decentralized structures to support community action? How does it differ between countries?

8. Fiduciary: IUCN is the implementing agency and accredited by the GEF. The question is about the project.

9. Stakeholders: co-design and participation is different from "informing" and getting "approval". We would expect - please confirm - that project design involves local stakeholders and subnational and local entities in the design of activities from the beginning and making sure their knowledge, ideas, needs and concerns are addressed in the design. Please confirm the approach to be taken.

10. What is IUCN ESS preliminary/PIF level risk screen rating?

(10/30/2023)

1. The revision is noted. Please cite from existing assessments/data (IPCR or other) **what** the expected range of impacts of climate change in the LMB will be by (add year) with regards to river flows and precipitation (percentage change) and temperature. What about the historical vs. predicted frequency and extend of floods and extended droughts ?

2. Addressed. Please expand **during PPG phase** with the special focus on inclusion of and impact on marginalized groups.

3. The challenge to bridge cross-sector interests across countries is a significant challenge as can be observed already and determines the rationale for the project. Project design in discussion with MRC and the countries needs to explore dialogue and communication across these interests groups.

4. o.k. Noted.

5. Addressed

6. Addressed (including listing key lessons in Annex H)

7. Please respond to the previous comment/s.

8. Addressed.

9. Noted/addressed.

10. Addressed.

(11/26/2023)

1. Please provide a short summary of the climate impacts on the basin/basin countries - see previous comment. Please cite from existing assessments/data (IPCC or other) **what** the expected range of impacts of climate change in the LMB will be by (add year) with regards to river flows and precipitation (percentage change) and temperature. What about the historical vs. predicted frequency and extend of floods and extended droughts ?

2. - 10 . Addressed adequately at PIF stage.

(11/29/2023)

Comment addressed. cleared.

**Agency's Comments**  
**29 November, IUCN**

The following text is added to the Barrie6 as well as the Climate Risks section of the PIF, highlighted in green in the uploaded version of the revised PIF:

*A recent MRC assessment<sup>11</sup> indicates that climate change will increase the vulnerability of freshwater ecosystems due to changes in precipitation, more frequent severe weather events, and prolonged droughts. A wide range of possible changes in climate is projected to occur in the LMB by 2060 including: (1) average annually basin-wide temperature increase could be as low as 0.3 C or as high as 3.3 C; (2) rainfall could vary from -23% to +23% in the dry season and -18% to +16% in the wet season depending on location; and (3) annual river flow could change by between -59% and +27%, and dry-season minimum 1-day flow by between -65% and +35% at Chiang Saen under climate change-only scenarios. Basin development will interact with climate change, in some cases exacerbating the change and, in some cases, mitigating it. In terms of observed changes in climate, the region has suffered three prolonged droughts over the last seven years (2016, 2020, 2021) that have shortened the wet season and contributed to the significant observed reduction in fish catch in the Tonle Sap between 2020 and 2015. The 2020 and 2021 droughts were exacerbated by Lancang wet season water retention, according to analysis by the Mekong Dam Monitor, which maps expected vs. observed discharge considering changes in precipitation, evaporation, and water retention.*

1. We specified the climate risks and how the project aims to integrate these risks. The most robust national level data on projected climate changes was added.

7. The MRC will work closely with the national Departments of Fisheries, who have the mandate to establish cross-sector coordination processes at the national level. The exact institutional arrangements will be finalised during the PPG phase. However, the project will equally work at the national level as otherwise necessary harmonisation of fisheries management and improved cross-sector coordination cannot be achieved.



## 20 October, IUCN

1. We specified the climate risks and how the project aims to integrate these risks.
2. We specified the key social and environmental risks and mitigation strategies.
3. Addressing limited coordination and trade-offs across various sectors within and across countries is crucial for the successful implementation of a fisheries project in the Mekong or any transboundary river basin. Governance-related risks can arise due to conflicting interests, overlapping responsibilities, and inadequate mechanisms for cooperation. We added risks and mitigation strategies.
4. The only macroeconomic risk we foresee is the consequence of the debt levels as mentioned in the PIF. Improving cross-sector coordination within the four LMB countries will help mitigate these risks.
5. Mitigating the risk of policy and strategy incoherence across sectors and goals is indeed critical. We added a few key risk mitigation measures to address this challenge.
6. We expanded on this risk by outlining some of the key lessons learnt from past work in the Mekong basin.
7. The MRC will work closely with the national Departments of Fisheries, who have the mandate to establish cross-sector coordination processes at the national level. The exact institutional arrangements will be finalised during the PPG phase. However, the project will equally work at the national level as otherwise necessary harmonisation of fisheries management and improved cross-sector coordination cannot be achieved.
8. We expanded the text accordingly.
9. Yes, we can confirm that the project design will involve local stakeholders and subnational and local entities in the design of activities from the beginning.

The preliminary ESMS screening is uploaded as Annex D in the relevant section of the online portal with the risk rating being Moderate

### 5.7 Qualitative assessment

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

### Secretariat's Comments

1. Please explain how the project on fisheries will be an entry point to achieve greater cross-sector strategy and policy dialogue and promote such alignment and coherence on national and regional levels. Please make that more clear across the project description.

2. Please also show how on the ground interventions are embedded in country specific execution structures (e.g. through government and/or customary structures as applicable).

(10/30/2023)

Yes, the project has high ambitions to address cross-sector misalignments on policy and planning and support policy coherence. Taking a fisheries project as an entry point is innovative and adequate in the Mekong which is home of one of the largest inland freshwater fisheries in the world. If successful the project's direct GEBs could be scaled up across the basin.

Comment 1 and 2 addressed.

Cleared

### Agency's Comments

**20 October, IUCN**

1. Component 1, the Nexus-focused Output 1.4, will establish an evidence base for cross-sector trade-offs and feed engagement processes conducted through Component 3. We improved the wording throughout the document to clarify these relationships. But as you point out, the project will chive both, improved cross-sector coordination as well as fisheries management improvements at regional and national level.

2. On-the-ground interventions will be largely carried out through Component 2. Here, national line agencies (Depts of Fisheries) will play a major role, which will ensure integrating solutions in national work plans. Details will be developed during the PPG phase.

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

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

Secretariat's Comments

1. Please expand on the alignment with the GEF IW strategy and specifically with the objective on freshwater.
2. Please show alignment of STAR resources with the requested focal area elements

(10/30/2023)

Comments overall addressed, but please take out reference to IW objectives IW-1 and IW-2 which refer to marine projects.

(11/26/2023) Addressed.

Agency's Comments

**21 Nov, IUCN**

Kindly note that all references to IW objectives IW-1 and IW-2 have now been removed

**20 October, IUCN**

1. We made clearer references to objective 3 of GEF IW and its goal to protect freshwater systems and improve the coordination of Nexus trade-offs.

Thanks for pointing this out. We also explained how the project aligns with the GEF8 goal of the biodiversity focal area. This is now clearly reflected in the relevant section of the online PIF version

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

### Secretariat's Comments

Please do not only show alignment with MRC strategies and development plans but also alignment to country priorities and plans. Please be specific and cite the specific plans and strategies. Further detail will be expected at endorsement, but even at PIF stage a general statement that the project is aligned with e.g. "national fisheries development programs ,,,...." etc. is insufficient.

(10/30/2023)

Comment addressed.

**At endorsement stage** please also elaborate on how the project will aim to improve cross-sector communication and planning at national levels.

### Agency's Comments

**20 October, IUCN**

We added much more details on the key fisheries management agencies and the core legislation with their respective goals.

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

### Secretariat's Comments

Please address.

Since the project uses BD STAR, IUCN needs to address Section C of the PIF template visa vis a.) GEF-8 BD strategy/entry points, and b.) Kunming-Montreal GBF targets.

(10/30/2023)

Addressed.

Agency's Comments  
**20 October, IUCN**

We added the relevant references.

**7 D. Policy Requirements**

**7.1 Is the Policy Requirements section completed?**

Secretariat's Comments

1. Please fully complete all questions on stakeholder engagement.
2. Please address the question on asking for a brief summary of who was consulted, when and where (names ! and dates ! ) of consultations during PIF formulation.

The table on consultations provided is sketchy and incomplete.

(10/30/2023)

1. Please fill out yes/no answer for the question on Indigenous People and Local Communities
2. Please add to the table WHO was at the meetings (names, gender, functions). If too long, please add as an additional annex.
3. Please add the ESS risk rating at PIF stage

(11/26/2023)

Comments addressed.

Agency's Comments

**21 Nov, IUCN**

- 1.This is now done
- 2.The table has been added as an additional Annex L
3. The risk rating is added in the PIF

**20 October, IUCN**

1. We completed the questions,

We added details on stakeholder engagement and a table compiling the most important events.

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

**Secretariat's Comments**

No - see above.

(10/30/2023)

See above.

(11/26/2023) Addressed.

**Agency's Comments**

**20 October, IUCN**

|

Please refer to our response to 7.1

**8 Annexes**

**Annex A: Financing Tables**

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

**STAR allocation?**

## Secretariat's Comments

1. The FA resources are available at the present time.
2. The IW Focal area elements should address the freshwater objective 3.
3. The financing table and focal area elements table only include IW-1 and IW-1-1 and IW-1-2, while the PPG table includes both IW-1 and IW-2. Please confirm if this is intentional or a mistake. Generally, project financing and PPG financing should be aligned in achieving FA objectives. Also note above to change the focal area elements to objective 3.

(10/30/2023)

1. Please **combine the IW focal resources into ONE line** and indicate not by country name but as **regional**. This is needed as IW resources are unlikely to split evenly between the four countries. Therefore, IW global/regional project should have one budget line for Regional for IW funding. Please revise the financing table **and** PPG table accordingly.
2. Please remove decimal places from **all financial tables and round to the nearest \$.**

(11/26/2023) Addressed.

## Agency's Comments

**21 Nov, IUCN**

1. The requested changes have been made and all IW resources have been moved into one line indicating regional
2. The requested change related to removing decimal places has been made

**20 October, IUCN**

1. Noted.
2. Apologies for this oversight. We added IW's objective 3.

We added IW-1-3.

**Focal Area allocation?**

Secretariat's Comments

1. The FA resources are available at the present time.

(10/30/2023)

Requested amount is available at present under the indicated focal areas.

Agency's Comments

**LDCF under the principle of equitable access?**

Secretariat's Comments NA

Agency's Comments

**SCCF A (SIDS)?**

Secretariat's Comments NA

Agency's Comments

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

Secretariat's Comments NA

Agency's Comments

**Focal Area Set Aside?**

Secretariat's Comments NA

Agency's Comments

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



## Secretariat's Comments

Yes.

(10/30/2023)

PPG is within the cap.

1. Please combine IW programming of funds under IW-3 as regional (not country by country).

(11/26/2023) Addressed.

## Agency's Comments

**21 Nov, IUCN**

1. The IW programming funds have been combined into a regional line as advised  
**8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?**

## Secretariat's Comments

There is no need for documentation as these are indicative at the PIF Stage.

Yet, please explain why there are no grant co-finance resources expected given a whole range of seemingly closely related efforts at MRC and country levels.

(10/30/2023)

1. **During Project design/PPG phase** please seek to leverage grant (investment mobilized) co-finance for some of the highly related efforts which support a similar objective as the current objective.

2. Also, especially for those that are MRC coordinated could there be cost-sharing of certain admin related staff positions and office services ? Please explore **during project design**.

Cleared

## Agency's Comments

**20 October, IUCN**

We added Annex H and Annex I to provide details on MRC activities. The PPG phase will allow for a clear definition of grant contributions and in-kind contributions.

### **Annex B: Endorsements**

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

## Secretariat's Comments

No. In the second submission a second LOE (out of four) was submitted leading to GEFSEC initial review.

1. Please submit endorsement letters by all four countries and be aware of the long lead times in some of the countries. LOEs from Viet Nam and Thailand are still missing.

2. Please revise the LOEs to list the GEF IW resources within the table i.e. for the LOEs from Cambodia and Laos, please include IW money in the financing table.

(10/30/2023)

1. The LOE for Thailand is still missing.

(11/26/2023)

The addition of the footnote in LOEs and the email from the Viet Nam OFP to confirm the footnote are noted.

**1. The LOE for Thailand is still missing.**

(11/29/2023)

**The LOE for Thailand is still missing.**

**We appreciate the communication that every effort is made by the MRC and the Thailand counterparts to obtain the remaining LOE by end of the month.**

(12/1/2023)

**The project has been rewritten focusing on three countries given that 80 % of inland fisheries are situated in Cambodia, Laos and Vietnam and with these countries having less financial capacity compared to Thailand. Thailand will though participate as a MRC member (as per the Mekong agreement) in technical discussions and especially output 1.4. which addresses Water-Food-Energy-Ecosystems Nexus dimensions (through MRC and its own resources outside the project).**

**Every effort is made to still obtain the LOE from Thailand which is expected to join the project during PPG (within the current GEF project budget, but Thailand will provide substantial co-finance when joining).**

**CLEARED**

Agency's Comments  
29 November, IUCN

1. Kindly note that we are still working on obtaining the Thailand LoE

21 Nov, IUCN

1. We are working on obtaining the LoE from Thailand

20 October, IUCN

1. Two updated LoEs are now uploaded for Cambodia and Lao PDR. The Viet Nam LoE is also uploaded. The Thailand LoE will be obtained in due course upon the impending decision of the GEF National Steering Committee and a LoE will be the likely outcome involving no STAR allocation

As advised, we have revised the LoEs accordingly and also included the IW money in the financing table

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

Secretariat's Comments

Only two, see above.

(10/30/2023)

1. The LOE for Thailand is still missing. - see above

(11/26/2023)

The LOE for Thailand is still missing.

(12/1/2023)

**See text above in previous question. Cleared.**

Agency's Comments

**21 Nov, IUCN**

Please refer to our response above

**20 October, IUCN**

Please refer to our response to Annex B

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

Secretariat's Comments

No. see above.

(10/30/2023) Viet Nam and Lao PDR LOE: the LOE template used for this project removed the footnote that conditions the selection of the executing partner to the following: *?Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate?.* Per the attached email back in March when we were aiming to constitute June 2023 Work Program, Agencies were informed that LoEs *?with modifications cannot be accepted and will be returned?.* While the removal of the footnote seems to be trivial, it is not: this footnote reduces the chances of having an executing partner that does not meet the fiduciary and procurement standards required to

safely execute the project. **Please get an email from the OFPs accepting this footnote to be part of the LoE (this is an alternative to request a new LoE).**

(11/26/2023)

The addition of the footnote in LOEs and the email from the Viet Nam OFP to confirm the footnote are noted.

Comment addressed.

Agency's Comments  
**21 November, IUCN**

Kindly note that the updated LoE with the footnote reinstated is now uploaded for Lao PDR.

In the case of Viet Nam, kindly note that a screenshot of an email from the OFP agreeing with the footnote is now uploaded

**20 October, IUCN**

Please refer to our response to Annex B

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

Secretariat's Comments N/A

Agency's Comments  
**Annex C: Project Location**

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

Secretariat's Comments

1. Geographic location data: In Annex D on Project Map and Coordinates, please consider inserting the geographic location of the site directly under the dedicated data entry field. This includes the Location Name, Latitude and Longitude.

2. While there is a basin map, please also add maps for areas mentioned in the project description (see earlier comment)

(10/30/2023)

As indicated by the agency, the final determination of focus locations for component 2 will only be determined during the project design/PPG stage.

Comments therefore addressed as is.

#### Agency's Comments

**20 October, IUCN**

1. Focus locations will be determined during the PPG phase after further in-depth consultations with national fisheries management agencies.

We will create maps during the PPG phase, once focus areas have been determined.

#### **Annex D: Safeguards Screen and Rating**

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

#### Secretariat's Comments

No. Please upload:

ESS: We note that the project overall ESS risk is classified as moderate. However, there is no environmental and social safeguards screening information including plan for environmental and social impact assessment and environmental and social management plan. Please provide environmental and social safeguards screening information at PIF stage and plan for environmental and social impact assessment and environmental and social management plan.

(10/30/2023)

ESS has been uploaded.

Comment addressed.

(12/1/2023) Please update the ESS during PPG including removing Thailand in case it is not to join. Yet that is expected to happen and removal of the country at PIF stage does not change the assessment and rating. Cleared.

#### Agency's Comments

**20 October, IUCN**

The Preliminary ESS screening form is uploaded as Annex D

#### **Annex E: Rio Markers**

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

#### Secretariat's Comments

What about the Rio Marker for LD ? Is it truly to be zero?

(10/30/2023)

Please change the LD Rio Marker to 1.

(11/26/2023)

Addressed and corresponds to use of LD STAR. Review at endorsement as needed and once on the ground interventions have been firmed up.

Cleared.

#### Agency's Comments

**21 Nov, IUCN**

As advised, the LD Rio Marker is now changed to 1

**20 October, IUCN**

This is now adjusted in the PIF

**Annex F: Taxonomy Worksheet**

**8.9 Is the project properly tagged with the appropriate keywords?**

Secretariat's Comments

O.k. at PIF stage.

(10/30/2023) Yes..

Agency's Comments

**Annex G: NGI Relevant Annexes**

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

Secretariat's Comments N/A

Agency's Comments

**9 GEFSEC Decision**

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

Secretariat's Comments



(5/31/2023) The project is strongly backed by MRC and the countries. Thank you for confirming another LOE. Please resubmit with the Cambodia LOE so we have 50% of LOEs submitted.

(7/21/2023) The project intentions and most of the project description is well outlined. Comments provided should be very doable to reformulate and address and we are looking forward to receiving the revised PIF. The formulation of the rationale and justification and ToC need special attention to be better aligned with GEF-8 agreed system level approaches and a concise but well laid out storyline. Two LOEs are still missing entirely; the two existing ones need revision.

Please revise responding to all review sheet comments and resubmit. PLEASE NOTE: given the summer and vacation leave of colleagues, we have not in detail reviewed the KM, SE and Gender sections and their policy alignment yet: to be provided in the next resubmission.

We would be happy to discuss any questions as needed and to aid revisions (including in person at Stockholm Water Week).

(10/30/23 to 11/2/2023) Most comments have been addressed. Please address the remaining comments and resubmit. Please do not hesitate to contact GEFSEC if you have any additional questions.

(11/26/2023) There are only a few comments still to be addressed. Please address and resubmit asap.

The LOE from Thailand is still outstanding.

(11/29/2023) All comments have been addressed. The LOE from Thailand is still outstanding.

**(12/1/2023) The project has been rewritten focusing on three countries given that 80 % of inland fisheries are situated in Cambodia, Laos and Vietnam and with these countries having the greatest need and less financial capacity compared to Thailand to address sustainable fisheries. Thailand though will participate as a MRC member (as per the Mekong agreement) in technical discussions and especially output 1.4. which addresses Water-Food-Energy-Ecosystems Nexus dimensions (through MRC and its own resources outside the project).**

**Every effort is made to still obtain the LOE from Thailand which is expected to join the project during PPG (within the current GEF project budget, but Thailand will provide substantial co-finance when joining).**

**The project is now technically cleared and recommended for inclusion for a future Work Program.**

Agency's Comments

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

Secretariat's Comments

Agency's Comments

**Review Dates**

	<b>PIF Review</b>	<b>Agency Response</b>
<b>First Review</b>	<b>5/31/2023</b>	<b>10/20/2023</b>
<b>Additional Review (as necessary)</b>	<b>7/17/2023</b>	<b>11/21/2023</b>
<b>Additional Review (as necessary)</b>	<b>10/30/2023</b>	<b>11/29/2023</b>
<b>Additional Review (as necessary)</b>	<b>11/26/2023</b>	
<b>Additional Review (as necessary)</b>		