

# Business Action and Advocacy for the Planet

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10930

**Countries**

Global

**Project Name**

Business Action and Advocacy for the Planet

**Agencies**

CI

**Date received by PM**

2/28/2022

**Review completed by PM**

5/19/2022

**Program Manager**

Matthew Reddy

**Focal Area**

Multi Focal Area

**Project Type**

MSP

# CEO Approval Request

## Part I ? Project Information

**1. Focal area elements. Is the project aligned with the relevant GEF focal area elements as indicated in Table A and as defined by the GEF 7 Programming Directions?**

Secretariat comment at CEO Endorsement Request

Yes. The project is equally split between BD, CCM and LD.

Agency Response

**2. Project description summary. Is the project structure/design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?**

Secretariat comment at CEO Endorsement Request Yes. The three components address global business engagement and four national level action plans.

Agency Response

**3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?**

Secretariat comment at CEO Endorsement Request NA

Agency Response

**4. Co-financing. Are the confirmed amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized, consistent with the requirements of the Co-Financing Policy and Guidelines?**

Secretariat comment at CEO Endorsement Request Yes. The co-finance ratio is 2:1 with a diverse range of leading private sector and philanthropic sources. No co-finance is mentioned at the level of the country initiatives. Could we encourage full inclusion of all sources of co-finance. If supporting documentation is not available then a note to address potential upside in resourcing is encouraged.

Agency Response

CI GEF Agency 3/17/2022

The reason why country co-financing has not been included at this stage is because Business for Nature does not yet have established activities in these countries and therefore cannot justify existing co-financing. However, during implementation phase Business for Nature will collaborate with partners nationally, leveraging activities, expertise and experience already in place, which will in practice represent in kind co-financing and contribute to greater impact than if activities started from scratch. Additional information has been added on in-kind co financing from paragraph 93 to 96.

**5. GEF resource availability. 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 CEO Endorsement Request Yes.

Agency Response  
**STAR allocation?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response  
**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request The focal area allocation is divided evenly across climate change, LDN and biodiversity - reflecting the integrated approach of the project.

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

Secretariat comment at CEO Endorsement Request N/A

Agency Response  
**SCCF (Adaptation or Tech Transfer)?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response  
**Focal Area Set Aside?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response  
**Impact Program Incentive?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response  
**6. Project Preparation Grant. If PPG is requested in Table E.1, has its advanced programming and utilized been accounted for in Annex C of the document?**

Secretariat comment at CEO Endorsement Request Yes. Annex C includes a table showing the current status of funding utilization.

Agency Response  
**7. Non-Grant Instrument. If this an NGI, are the expected reflows indicated in Annex D?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response  
**8. Core Indicators. Are the targeted core indicators in Table E calculated using the methodology in the prescribed guidelines? (GEF/C.54/Infxxx)**

Secretariat comment at CEO Endorsement Request  
Yes.

Indicator 11 showing the number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment is documented.

It is noted in the Monitoring and Evaluation section 9.5 that the relevant GEF Core Indicators will also be completed i) prior to project start-up, and ii) at the time of the terminal evaluation.

Agency Response  
**9. Project taxonomy. Is the project properly tagged with the appropriate keywords as in Table G?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response  
**Part II ? Project Justification**

**1. Project Description. Is there sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?**

Secretariat comment at CEO Endorsement Request

The project description is comprehensive and references the most recent studies in this field of nature and climate related to the private sector.

Could the project further address the typology of the different private sector actors involved, including MSMEs and how the project proposes to include a diverse range of private sector actors across key sectors that have identified as being significant contributors to environmental degradation.

Annex P is noted on the selection criteria for companies.

Agency Response

CI GEF Agency 3/17/2022

For the project to be successful, BfN will engage companies from all sectors, geographies and of all sizes including MSMEs, for example by ensuring that public consultations and webinars are accessible and available to all businesses. For policymakers to have comfort that there is business momentum on nature, they need to hear from and engage with different voices. Larger companies are particularly influential due to their broad values chains, resources and media outreach. However to drive business action, all kinds of business need to be considered to achieve a nature-positive economy. For example, while smaller companies may be willing to assess and disclose on their impacts and dependencies on nature, they will require support in the form of financial resources and capacity building. It is important to note that BfN as a coalition includes many partners that engage directly with SMEs, in countries but also with the International Chamber of Commerce that includes 45 million companies in over 100 countries.

More content has been added to paragraphs 5 and 120 to reflect this.

**2. Project Description. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?**

Secretariat comment at CEO Endorsement Request

Yes. The baseline accounts for a business as usual scenario in which fragmentation and a lack of effective engagement between policy makers and business prevent the transformational shifts needed.

## Agency Response

**3. Project Description. Is there an elaboration on the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there more clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?**

## Secretariat comment at CEO Endorsement Request

Yes.

The project clearly states the objectives of the global project and provides greater context on the expected outcomes of components 2 and 3 in relation to the specific contexts of each selected country.

The project identifies a longer term outcome horizon to which the project will contribute.

Could the project further elaborate on the specific role of the private sector in scaling up engagements beyond the selected four countries and knowledge exchange.

The roles of the co-financing partners beyond the financial contribution through supporting initiatives, technical guidance, communications and leadership (amplifying the ambition loop) could be described more fully (beyond the general description in table 2).

## Agency Response

CI GEF Agency 3/17/2022

The four countries are considered as exploratory cases that will drive learning and ultimately action in a specific country, but also share that with the broader business and government communities globally. We anticipate that several of the companies engaged in one country also operate in other countries around the world and could help disseminate their experience from a global perspective.

Regarding the roles of the co-financing partners, please see below further detail.

Capitals Coalition has established 'Capitals Hubs' in Australia, Brazil, Canada, Colombia, Luxembourg, Madagascar, Mexico, The Netherlands, Scotland, South Africa, Spain, UAE, West Africa, that are formed by communities of practitioners that develop and scale the capitals approach within specific regional or national contexts or within

industries or sectors. These provide capacity building opportunities and a network for BfN to share learnings. The Capitals Coalition provides technical input to BfN for example on measurement and valuation of natural capital (the Natural Capital Protocol), training programs and insights on the development of standards and bodies towards integrated assessments and disclosure.

WBCSD has a [Global Network](#) of more than 60 CEO-led business organizations worldwide. The Network, encompassing some 5,000 companies, is united by a shared commitment to provide business leadership for sustainable development in their respective countries and regions. Several of BfN's national partners are part of the WBCSD Global Network, which will be a valuable platform to share learnings from the four countries. In addition, several of these national partners have well-established relationships with their governments and could prompt additional efforts to bring leading businesses into the shaping the implementation phase of the GBF. In addition, WBCSD develops tools with its member companies (by business, for business) that contribute to BfN's articulation and engagement with companies, for example the [Nature Positive building blocks](#).

We Mean Business has experience on company engagement on the climate NDCs implementation and can help cross-learning from climate. They also were part of engaging SMEs on climate action through the [SME Climate Hub](#).

WWF and Conservation International operate globally and has vast and influential outreach, including to governments. They work closely with many companies and could help share learnings from the four countries across their respective networks. Additional information on role of cofinancers has been added on in-kind co financing from paragraph 93 to 96 of the ProDoc/Incremental Cost Reasoning section of the CEO ER/portal

**4. Project Description. Is there an elaboration on how the project is aligned with focal area/impact program strategies?**

Secretariat comment at CEO Endorsement Request

Yes.

Could the project include direct reference to impact programs in GEF-7 that are related to the project - namely:

Food Systems, Land Use and Restoration Impact Program

Sustainable Forest Management Impact Program

Also the specific focal area objectives in GEF-7 that could be included, in addition to the objectives cited in section 4:

BD Focal Area Objective 2. Address direct drivers to protect habitats and species

CC Focal Area Objective 2. Demonstrate mitigation options with systemic impacts

LDN Focal Area Objective 1. Support on the ground implementation of SLM to achieve LDN

Agency Response

CI GEF Agency 3/17/2022

Alignment with GEF Focal Area and/or Impact Program Strategies section has been updated to include the suggested focal area objectives as well as information on alignment with impact program strategies have been added. Please refer to paragraphs 82 to 85.

**5. Project Description. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?**

Secretariat comment at CEO Endorsement Request

Yes.

Agency Response

**6. Project Description. Is there a better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?**

Secretariat comment at CEO Endorsement Request

Yes.

The project's relative short duration is noted and that many benefits are expected to accrue beyond the project timeframe.

Please adjust the typo "conservation of species and genetic divers at a global scale."

Agency Response

CI GEF Agency 3/17/2022

Typo corrected

**7. Project Description. Is there a better elaboration to show that the project is innovative and sustainable including the potential for scaling up?**

Secretariat comment at CEO Endorsement Request

Yes.

Could the project better account for the role of the private sector in scaling up - such as transferring standards and practices to other commodity value chains, to similar geographies, through engagements in other multi-stakeholder fora, and with other national level sustainable business organizations outside the scope of this project.

Agency Response

CI GEF Agency 3/17/2022

Through influencing business action and advocacy, the project will indirectly support scaling up and increased awareness and activities by sharing standards and practices to other commodity value chains, to similar and other geographies, through engagements in other multi-stakeholder fora, and with other national level sustainable business organizations outside the scope of this project.

Text has been updated to reflect this on paragraph 104 of the ProDoc or the Potential for Scaling up section of the CEO ER/ProDoc

**8. Project Map and Coordinates. Is there an accurate and confirmed geo-referenced information where the project intervention will take place?**

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

**9. Child Project. If this is a child project, an adequate reflection of how it contributes to the overall program impact?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**10. Stakeholders. Does the project include detailed report on stakeholders engaged during the design phase? Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?**

Secretariat comment at CEO Endorsement Request

Yes.

The stakeholder engagement plan is comprehensive, and the inclusion of MSMEs and indigenous peoples is noted and the multiple roles of CSOs.

Agency Response

**11. Gender equality and women's empowerment. Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities? If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?**

Secretariat comment at CEO Endorsement Request

Yes.

In relation to identifying gender differences and including gender responsive activities, the goal of framing underrepresented women business leaders as agents of transformative change is well noted.

Agency Response

**12. Private sector engagement. If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?**

Secretariat comment at CEO Endorsement Request

Yes.

Could we request further articulation of the typology of private sector to be engaged - MSMEs, cooperatives, national level companies etc.

What is the relationship between the private sector actors and how can this project translate from CEO leadership of global corporations to actions on the ground by smallholders and MSME actors?

Agency Response

CI GEF Agency 3/17/2022

CEO leadership from major companies sends signals to governments on the need for policy ambition, but also to their suppliers of which most are SMEs. After all, SMEs represent about 90% of businesses worldwide. This also means that SMEs are crucial to the success of achieving a nature-positive world. BfN focuses on the 'triggers' that

could have the biggest positive ripple-effect in the economy. As Jason Clay from WWF has stated: if we could convince just 100 key companies to go sustainable, global markets will shift to protect the planet our consumption has already outgrown. Therefore, BfN aims to shift the economy by driving the agenda through big corporate voices, while ensuring we are also calling for SMEs and smallholders to be part of the just transition and equipped with the support, resources and capacity building needed to contribute actively. Additional information has been added in paragraph 120 of the ProDoc or the Private Sector Engagement of the CEO ER/Portal

**13. Risk. Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?**

Secretariat comment at CEO Endorsement Request

Yes.

The assessment seems justified and the risk mitigation measures adequate.

Has the project also considered the risk of each country's capacity and interest to work with the private sector in the manner described for component 2?

Agency Response

CI GEF Agency 3/17/2022

Risk table has been updated to reflect this. Please refer to the Risk Section of the CEO ER/Prodoc

**14. Coordination. Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?**

Secretariat comment at CEO Endorsement Request

Yes.

The diagram and roles of the PMU and national level partners is clear.

The linkages with TNFD and sectoral initiatives is well noted.

Agency Response

CI GEF Agency 3/17/2022

Footnote to paragraph 116 of the ProDoc has been added to paragraph 123 to reflect the future updates on the EA.

Note: From 1 April to 30 June 2022, BfN is transitioning from being legally hosted at WBCSD to Rockefeller Philanthropy Advisors (RPA). At the time of submitting the proposal and the follow-up exchanges, BfN is still with WBCSD however the legal arrangement and implementation will be directly with RPA, who will become the EA.

**15. Consistency with national priorities. Has the project described the consistency of the project with identified national strategies and plans or reports and assessments under the relevant conventions?**

Secretariat comment at CEO Endorsement Request

Yes.

The UNFCCC, UNCCD and UNCBD are documented as the relevant conventions and the project demonstrates an integrated approach to the countries' national plans.

Agency Response

**16. Knowledge management. Is the proposed Knowledge Management Approach for the project adequately elaborated with a timeline and a set of deliverables?**

Secretariat comment at CEO Endorsement Request

Yes.

Could the project more fully account for the co-financiers and partners' roles in delivering and supporting key KM materials and messages?

Agency Response

CI GEF Agency 3/17/2022

Additional information on role of co-financiers and partners has been added in paragraph 152.

**17. Monitoring and Evaluation. Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?**

Secretariat comment at CEO Endorsement Request

Yes.

Table 7 includes a justified budget and M&E elements.

Agency Response

**18. Benefits. Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?**

#### Secretariat comment at CEO Endorsement Request

Yes.

Could the co-benefits reflect the healthy people, healthy planet concept and include human health benefits that are expected from positive climate and nature outcomes.

#### Agency Response

CI GEF Agency 3/17/2022

In line with the healthy people, healthy planet concept this project will contribute to shifting economic activities so that they are within planetary boundaries (leveraging on the Global Commons Alliance) and keep social wellbeing, including health at the center. Text has been updated to reflect this in paragraph 176 of the ProDoc/Benefits section of the CEO ER/portal

#### **19. Annexes:**

**Are all the required annexes attached and adequately responded to?**

Secretariat comment at CEO Endorsement Request Yes.

#### Agency Response

#### **20. 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 CEO Endorsement Request Yes.

#### Agency Response

**Project Results Framework**

#### Secretariat comment at CEO Endorsement Request

Could the section wording "Objective: Towards a nature positive world by 2030 through businesses driving policy ambition and reducing negative corporate impact." to "nature and climate positive" (or similar) to reflect the integrated goals.

Could this section provide further clarity on 3.1.3? Will the language used for publications be English or will other languages (Spanish for example) be included to support wider adoption?

#### Agency Response

CI GEF Agency 3/17/2022

Although we understand the recommendation on the objective wording, we would prefer to keep it as originally proposed. The focus of the project is on nature, specifically targeting biodiversity given that this complements the existing initiatives working on climate change. However, the project will contribute to progress towards a nature positive, **net zero emissions and equitable** world by 2030 and therefore we agree with the framing even if our project has a nature-specific focus. Nature positive, as the big picture vision is inter-dependent on net zero emissions and equitable approaches to nature.

Output 3.1.3 has been updated to reflect the suggestion. The addition is: Most material will be available in English, however BfN communication in four countries will be also available in local languages, e.g. Spanish.

#### **GEF Secretariat comments**

##### Secretariat comment at CEO Endorsement Request

?The project clearly identifies the root causes, barriers and opportunities to engage business in moving from net loss of nature to net positive by 2030.

The integrated approach proposed combines LDN, BD and climate change goals to create an integrated overarching direction for business which supports the direction of GEF-8. The interconnectedness of addressing a variety of global environmental problems, including climate change, biodiversity loss, and land/marine ecosystem degradation will also support private sector engagement into other GEF supported activities such as TNFD, initiatives linked to natural capital valuation and the proposed Integrated Programs of GEF-8.

The document could further elaborate on how the financing partners will support this initiative beyond their investment, especially in the KM section and also better account for the engagement of all scales of the private sector and the opportunities to link actors through land/seascapes and value chains. The role of the private sector participants and taking this initiative forward into other regions, independently of the GEF project scope, and scaling the potential outcomes should also be included.

#### Agency Response

**05/27/2022:**

**Response on question on Investment Mobilized definition: The cash grant co-financing is considered investment mobilized because they are new investments with a specific scope of work and are time bound. CI, therefore, considers them not recurrent rather an investment mobilized to the project. Thus, those cash grants are being invested to contribute directly to the goals of the projects as a team effort from multiple**

organizations, but not through the Executing Agency. Investment mobilized section of the portal updated.

Response on Budget table question: Per the information provided for co-financing, the co-financing is from organizations contributing directly to the Project as a team effort, but not funding going directly through or managed by the Executing Agency. We have amended the budget to reflect that the management activities under the Project Manager are charged only to PMC.

Response on the footnote: Footnote amended to state that "Indirect or Other Operating costs are incurred during the grant period to support the grant the core deliverables against the grant outcomes. CI conducted due diligence of WBCSD and CI verified that there is a clear methodology and that those indirect or other operating costs are auditable. These costs have been allocated across the expense categories using a consistent "best practices" methodology". Co-financing is paying for activities that contribute to the objectives of the project and but this co-financing is not going to or being managed by the Executing Agency.

04/14/2022: Responses to comments received from GEFSEC/PPO

1. Please request Agency to upload an excel version of the budget table into Portal for easy review ? we will provide further comments if appropriate. Budget table added

? MAVA Foundation grant: change to ?In-kind? and ?Recurrent expenditures?.

o Reason: According to the co-financing letter, MAVA Foundation is the recipient of the grant who will be implementing a parallel project in support of the GEF project. The GEF Guidelines on co-financing define Grant as a resource provided without the expectation of repayment and is classified as ?investment mobilized?. We have consistently interpreted the definition to apply to all co-financing sources, on parallel projects or otherwise. The policy defines in-Kind as contributions in the form of goods or services other than money and are classified as ?recurrent expenditures?. In this case, the MAVA Foundation secured new funding that supports this project, as opposed to supporting via recurrent expenditures.

? Stichting Benevoletia-Porticus grant: change to ?In-kind? and ?Recurrent expenditures?. o Reason: Same as above Same response as above.

WWF: change ?Other? to ?Donor Agency? Section III Co-financing table updated as per GEF suggestion.

3. Core Indicators: Please include the target for core indicator 11 in the results framework in annex A. Targets for core indicator 11 has been added in results framework in Annex A. It is part of the objective indicators for the project.

4. On the Status of Utilization of Project Preparation Grant (PPG): this section in Portal demands "detailed funding amount of the PPG activities financing status". However, there is no detailed information per activities as shown in the table below " please ask the Agency to amend. Annex B includes the following information: "GEF 1-Step MSP Development including the following activities were conducted: stakeholder mapping and engagement; Preparation of the CEO Endorsement and budget; and the Preparation of safeguards plans." All activities were carried out by a consulting firm. CI-GEF has paid them \$21,900 to date. The remaining \$8000 will be paid to the consultants upon CEO Endorsement. While time from the BfN team was spent on the Proposal development activities, only the consultant fees have been funded by the PPG Grant.

5. Budget table:

(i) Project Manager is charged to components and PMC - Per Guidelines, the costs associated with the project's execution have to be covered by the GEF portion and the co-financing portion allocated to PMC. Requesting the costs associated with the execution of the project to be covered by the PMC is reasonable " by so doing, asking the proponents to utilize both portions allocated to PMC (GEF portion and co-financing portion) is also reasonable. The budget presents the level of effort required to deliver on the project components (execution of activities), as well as M&E, and the PMC activities. Further, per the policy, whenever personnel are contributing to components and PMC a terms of reference must be included. A ToR was provided for all staff providing execution function and also charged to PMC. PMC is co-financed proportional to PMC charged to the project.

(ii) Project personnel costs (5 positions as show above) already account for 70% of this project's budget. On top of this, it seems to be that WBCSD, the executing agency, is charging 13% indirect/overhead costs to the project. GEF Funds cannot cover overhead " please ask the Agency to remove this expenditure. This is a global project being executed by a Swiss entity with project objectives that entail strategic private sector engagements, co-ordination and communication with large corporations and governments/policy makers around the globe. The work is directly done by the project team who have the technical capacity and skills to liaise with governments and business in four different geographies and at a global level. Unlike a country project, this project does not involve any field work or purchase of equipment but rather focuses on engagements and coordination in four key geographies by the project team which adds a level complexity and project personnel costs. Country engagements will be supported by national consultants with Business for Nature team leading it.

The GEF guidelines provide for a cost category of "Other Operating Costs". As noted in the budget, these costs partially cover the necessary operational costs to provide the

technical outputs necessary to achieve the project's outcomes while adhering to the GEF Minimum Fiduciary Standards (GMFS) and other GEF policies. These costs include among others-grants and contracts administration and legal support, which are actual other operating costs that are necessary to deliver on the project outcomes. These costs are not included elsewhere in the budget and uses an auditable allocation methodology. In order for organizations of this magnitude to engage in GEF projects, they have to cover these costs to ensure alignment with the GMFS and engage on a global scale.

CI GEF Agency 3/17/2022

The following additions have been made to address the GEF feedback. A summary of the additions is included below:

Knowledge Management: see paragraph 152 of the ProDoc or the KM section of the CEO ER/portal

Upscaling across value chains and after project termination: see paragraph 104 of the ProDoc or the Scaling up section of the CEO/Portal

Different types of sectors and company sizes engaged, their relationships amongst each other: see Paragraph 120 of the ProDoc or the Private Sector Engagement section of the portal.

**Council comments**

Secretariat comment at CEO Endorsement Request

Agency Response

**STAP comments**

Secretariat comment at CEO Endorsement Request

Agency Response

**Convention Secretariat comments**

Secretariat comment at CEO Endorsement Request

Agency Response

Comments received from PPO:

1	Budget: addressed	
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2	<p>Co-financing (comment provided by Seo-Jeong): only the third comment was addressed ? the other two (copied below) were not. Please ask the Agency to amend:</p> <ul style="list-style-type: none"> <li>? MAVA Foundation grant: change to ?In-kind? and ?Recurrent expenditures?.</li> <li>o Reason: According to the co-financing letter, MAVA Foundation is the recipient of the grant who will be implementing a parallel project in support of the GEF project.</li> <li>? Stichting Benevoletia-Porticus grant: change to ?In-kind? and ?Recurrent expenditures?.</li> <li>o Reason: Same as above</li> </ul>	As per discussion with the GEF, this was addressed.
3	Core Indicators: addressed	
4	<p>Status of utilization of PPG: not addressed. Please ask again the Agency to provide detailed information on the activities (i.e. consultants, workshops, etc.) instead of per output (preparation of CEO Endorsement and budget and safeguards, stakeholder mapping, etc.) We need to understand what was paid.</p> 	There was no travel or personnel charges. The only cost for this MSP was to hire a consultant to deliver the one-MSP, and to develop safeguard plans. The line for consultants was updated.
5	<p>Budget table:</p> <p>a. We read the explanation provided by the Agency in the Review Sheet. It is true that Guidelines include the possibility of including terms of reference (in this case of the Project Manager). However, Guidelines are also clear , by indicating that people mapped to the PMU have to be covered by the GEF portion and the co-financing portion allocated to PMC so GEF trust funds ?not bear a disproportionate burden of the total management costs for GEF-financed projects, when co-financing is included? (paragraph 5 ? page 50 of the Guidelines). The co-financing portion to PMC is 390 K, and considering that the grants portion of co-financing is 1.4 million, there is room to better contribute to cover the costs of the Project Manager from co-financing (instead of fully charge it to the GEF portion).</p> <p>b. While it is understood the reasons why this project has high costs of personnel (which is not staff mapped to the PMU excepting for the Project Manager ? see above), the GEF resources are not paying overhead costs at all. We have consistently denied such request to all projects that have come up with this. Please ask the Agency to remove this cost from the budget note (they can cover this from the co-financing resources).</p> 	<p>a. We have removed component from the Project Manager and other functions that will deliver results, rather than management.</p> <p>a. Indirect or Other Operating costs during the grant period to support the deliverables against the grant are actual costs necessary to the project. The project cost was updated to reflect this.</p> <p>Footnote has been updated as follows: <i>Indirect or Other Operating costs are not to be included in the grant period to support the core outcomes of the grant outcomes. CI conducted a review of WBCSD and CI verified that there is no methodology and that those indirect costs are auditable. These costs have been removed across the expense categories using the "practices" methodology.</i></p>

**Other Agencies comments**

Secretariat comment at CEO Endorsement Request

Agency Response  
CSOs comments

Secretariat comment at CEO Endorsement Request

Agency Response  
Status of PPG utilization

Secretariat comment at CEO Endorsement Request

Agency Response  
Project maps and coordinates

Secretariat comment at CEO Endorsement Request

Agency Response  
Part III ? Country and Agency Endorsements

**1. 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 CEO Endorsement Request N/A

Agency Response  
**Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)**

Secretariat comment at CEO Endorsement Request

N/A

Agency Response

**Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)**

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

**GEFSEC DECISION**

**1. RECOMMENDATION.**

**Is CEO endorsement/approval recommended?**

Secretariat comment at CEO Endorsement Request

**Review Dates**

**1SMSP CEO  
Approval**

**Response to Secretariat  
comments**

<b>First Review</b>
<b>Additional Review (as necessary)</b>

**CEO Recommendation**

**Brief reasoning for CEO Recommendations**