

Empowering conservation action on the East Asian Australasian Flyway (EAAF) through Establishment of a Global Flyways Grant Mechanism (GFGM) for Civil Society Organizations

Review PIF and Make a recommendation

Basic project information

GEF ID

12290

Countries

Regional (Cambodia, Indonesia, Lao PDR, Mongolia, Papua New Guinea, Philippines)

Project Name

Empowering conservation action on the East Asian Australasian Flyway (EAAF) through Establishment of a Global Flyways Grant Mechanism (GFGM) for Civil Society Organizations

Agencies

ADB

Date received by PM

3/2/2026

Review completed by PM

Program Manager

Hannah Fairbank
Focal Area
Biodiversity
Project Type
FSP

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

HF March 11 2026

Yes

Agency's Comments

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

HF March 11 2026

Yes

Agency's Comments

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

HF March 30 2026

Cleared.

HF March 11 2026

a.) Suggest simplification of project objective.

b.i) Please write out all abbreviations/acronyms prior to first use.

ii.) Please better differentiate 1.1.1. and 1.1.2.

iii.) 2.1.3 further revision/clarification of language is needed.

iv.) 2.1.4 Suggest redacting reference to Target 3, and increasing clarity of this outcome.

v.) Outcome 3.1: Seems that instead of this outcome being focused on CSOs **receiving the grants** from the GFGM (which is well captured in Component 2), but instead should focus on obtaining organizational capacities/capabilities needed to effectively implement the grants (from Component 2) and achieving conservation results as intended (which seems to be the intent of Component 3). Please revise accordingly.

Agency's Comments

ADB 26 March 2026

3.1 a)

Added new project objective to Indicative Project Overview (highlighted yellow in PIF).

"To establish a Global Flyways Grant Mechanism (GFGM) for civil society organizations (CSOs) that enables civil society led conservation, restoration and sustainable management of globally significant wetland sites on the East Asian Australasian Flyway (EAAF), producing benefits for biodiversity, climate and people."

Also added the new project objective in other parts of the PIF where the project objective is mentioned (ToC, Project objectives, components, outcomes, outputs section).

b. i) Various edits added to table to write out abbreviations and acronyms for first use and ease of read. All highlighted yellow

ii) Added "(e.g., established governance and fiduciary systems and processes at global and regional levels)" to 1.1.1 and "(e.g., design and establishment of granting systems and processes and capacity building program)" to 1.1.2 to further differentiate these outputs. Highlighted yellow in text. Edited these outputs accordingly in Components, Outcomes, Outputs section too (also highlighted yellow).

iii) typo adjusted: mobilized to mobilize. Rephrased for clarity: "2.1.3 Project implementation grants mobilize CSO led projects including nature based solutions (NbS) and sustainable finance initiatives (SFI) that deliver conservation and protection of globally threatened migratory species; conservation, restoration and/or sustainable management of priority wetlands and emissions avoidance". All redactions highlighted black and additions highlighted yellow.

v) redacted: progress towards 30 by 30 (Target 3: Kunming Montreal-Global Biodiversity Framework KM-GBF) as per feedback. Output now reads: "Project Implementation grants for priority sites resulted in improved site protection including through support for formal designations as Flyway Network Sites (under the East Asian Australasian Flyway Partnership) (EAAFP), Ramsar Sites (under Ramsar Convention), and/or as protected areas or Other Effective Area-based Conservation Measures (OECMs)". Same changes made in Components, Outcomes, Outputs section. All additions highlighted yellow and redactions highlighted black.

v) Redacted: "...receive grant funding and leverage sustainable finance for flyway conservation initiatives?"

Outcome 3.1 is now: 3.1 CSOs strengthen organizational and technical capacities and capabilities enabling delivery of GFGM grants and ability to attract future investment? Also adjusted in Components, Outcomes and Outputs section.

All additions highlighted yellow and with certain sections redacted out.

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

Secretariat's Comments

HF March 30 2026

Cleared

HF March 11 2026

1.) Gender considerations have not yet been sufficiently mainstreamed at the PIF stage. While the project indicates that gender will be taken into account, these considerations are not currently embedded in the project design, including the Indicative Project Overview and the key outputs. Please address.

2.) Please strengthen gender mainstreaming across the project. In particular, Outputs 1.1.1, 1.1.2, 2.1.1, 2.1.2, and 3.1.1 should explicitly incorporate gender-responsive policies, guidelines, and selection criteria. This should include clear measures to actively target and support women-led organizations, as well as to address barriers that limit their participation and access to funding. In addition, under Output 1.1.3, we recommend ensuring that gender experts and representatives of women-led organizations are meaningfully included in the GFGM governance and decision-making structures, as well as in knowledge management and learning activities.

Agency's Comments

ADB 26 March 2026

1) gender considerations have now been fully mainstreamed across the project design, outputs, and M&E framework.

2) GFGM governance, policies, and operational systems (Outputs 1.1.1-1.1.3) incorporated gender-responsive principles with women-led CSOs and IPLCs actively included in decision-making and knowledge activities. Grant-making (Outputs 2.1.1-2.1.2) and capacity-building (Output 3.1.1) explicitly prioritize women-led organizations and address barriers to participation. These revisions ensure that gender and IPLCs considerations are integrated across all components, outputs, and M&E with clear measures to actively support women and IPLC-led organizations.

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

HF March 11 2026

Yes. Cleared.

Agency's Comments

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

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

b) Are the key barriers and enablers identified?

Secretariat's Comments

HF April 10, 2026

Cleared.

HF March 30 2026

a.) & b.i.) Cleared.

b. ii.) Annex J lists the three wetland/RFI sites that are already benefiting from GEF-8 resources (e.g. #119, 122, 123), where as the response in the review sheet states that: "(Candaba, Sibugay Wetlands, and Lake Mainit) in Philippines where an RFI project is already funded by the GEF (11578) will not be eligible for support via the GFGM using GEF funds." Therefore, in order to clarify and be consistent with the review sheet response, please state in the PIF and Annex J that potential project sites that are already receiving GEF-8 resources will not be eligible for further GEF-8 resources via GFGM without prior justification, review and GEFSEC approval. Will include that in the CER comments as well.

HF March 11 2026

a.) Please revise Threat **a.) Loss and degradation of coastal wetlands** to be commensurate/aligned with analysis of the other threats by shortening, bringing list into paragraph and redacting para regarding placement of CSOs to monitor and address this threats.

b.) Suggest including behavior change into the CEPA approach.

ii.) In the ADB RFI section noting this passage: "Acknowledging that GEF cannot be used to co-finance existing GEF investments, the only exception to this is three sites (Candaba, Sibugay Wetlands, and Lake Mainit) in Philippines where an RFI project is funded by the GEF. If any further GEF investments are secured by ADB to progress project work on RFI sites, these would also be ineligible for support via the GFGM using GEF funds." Please provide further explanation of the status and role of these three sites in the Philippines visa vis this PIF since they have current GEF financing via an ADB project. Please note that GEF funds may not be used to co-finance another GEF project, and justification in terms of baseline, additionality and complementarity would be required if this project proposes GEF financing for additional activities at these same three sites.

Agency's Comments

ADB 10 April 2026

b. ii) Text updated within the PIF as well as a revised Annex J to reflect this point as per the request

ADB 26 March 2026

a) Section has been edited down in accordance with comments with edited section highlighted in yellow in PIF

b) Added under **Barriers 1. Inadequate valuation, communication, education and public awareness (CEPA)**: Conservation efforts and CEPA approaches may also lack integration of behavior change strategies, resulting in missed opportunities to engage local knowledge, understand motivations for harmful behaviors and practices and co-create conservation solutions with local people that are cognizant of their needs, motivations and values and provide benefits and incentives to support desired behavior change. and Integrating behavior change strategies to conservation projects and CEPA approaches provides an opportunity to better research and respond to the motivations, actions and needs of local people, encourage participation and co-creation at project design stage and embed strong local ownership to support and sustain wetland protection and management through changed behaviors, practices and norms

ii) Text updated to properly reflect the meaning. Annex J shows the full list of sites across the EAAF for which, participating country CSOs will be eligible to drive conservation action using grants disbursed through the GFGM. GEF resources cannot be used to co-finance existing GEF investments and as such three sites (Candaba, Sibugay Wetlands, and Lake Mainit) in Philippines where an RFI project is already funded by the GEF (11578) will not be eligible for support via the GFGM using GEF funds

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

HF March 11 2026

Yes

Agency's Comments

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

HF April 10, 2026

Cleared.

HF March 30 2026

a.) & b.) Cleared.

iv.) Noted. Please use the CEPF indicator framework (which has previously been GEF reviewed and approved) as a basis to develop the indicator framework for GFGM which will ensure consistency and integrity of results measurement and reporting.

v.) Cleared.

HF March 11 2026

a.i) The four causal pathways should be revised to articulate the causality that underpins the project approach/TOC. A basic way to articulate this is **IF...Then** statements. The "assumptions" should then capture what is assumed in this causal relationship (e.g. the participation of CSOs will increase the effectiveness and durability of flyway conservation efforts etc) which should then be tested via M&E frameworks (e.g. is this true? is CSO participation increasing the effectiveness and durability of flyway conservation efforts? if not, why not?) and contribute to adaptive management (e.g. how to do things differently based on what is being learned about critical project assumptions). Please revise.

ii.) The TOC diagram in the Portal entry is a bit blurry. Please upload higher resolution file keeping in mind that STAP and GEF Council will only review the PIF entry itself, and won't have access to the annexes/attachments.

iii.) The TOC diagram contains the basic elements of the project design (e.g. objective/components/outcomes/outputs) but doesn't capture the theory of change that underpins the project design. Causality is the critical ingredient missing from the narrative and the graphic. Please revise.

b.i) Please remove reference to the 9th replenishment of the GEF trust fund.

ii.) Write out EAAF in the objective (and all other acronyms the first time) to ease audience understanding.

iii.) Component 2: The phrase "demand-driven" comes up several times but it is still not clear what this means in the context of this mechanism. Please clarify or redact/revise.

iv.) 2.1.3 "Project implementation grants to CSOs mobilized": How much of the \$5.8 million GEF and \$88.1 million co-finance in Component 2 will be dedicated to implementation grants? The intensity of this investment would clearly influence the extent to which this project would have on-the-ground impacts and achieve results contributing to the GEF core indicator targets. Particularly given implementation grants are only a portion of the grants planned (e.g.

project preparation grants are also included). Further, noting that the CI targets for this project are quite ambitious, and need to better understand how the scale of the financing going to actual implementation translates into hectares on the ground.

v.) 2.1.3 The Grant Making Process diagram is helpful. Please write out the abbreviations to readers don't have to translate all the acronyms. The purple "buckets" or areas of investment for the implementation grants need further development. We would imagine much of that would happen at PPG, but at PIF, please provide further explanation of each (some are very broad as previously noted e.g. 'Nbs' or need further explanation of assumed links e.g. "SFI and income generation" and please reference previous comments on "awareness raising" and need to design/target for actual behavior change results) and how they will be focused to ensure global biodiversity impacts. The achievement of GEBs within the life of project will hinge on these grants, thus please provide a more robust description of what/how they will contribute to conservation/restoration of key sites.

Agency's Comments

ADB 10 April 2026

iv.) Noted we can use the existing CEPF M&E/ Indicator framework for GFGM, further elaboration and details can be worked out during the PPG phase and discussed with the GEF.

ADB 26 March 2026

a.i) Section describing ToC and four causal pathways has been revised according to feedback and to include new Project Objective, likewise with assumptions listed in relation to this causal relationship underpinning the project's ToC. All additions highlighted yellow, with note that certain sections have been redacted out.

ii) The TOC diagram has been updated to align with the revised outputs and outcomes.

iii) The causality pathways have been updated in the diagram to try and address the GEF comments

b. i) Redacted reference to the 9th replenishment of the GEF Trust Fund.

ii) Changed acronyms for ease of read and highlighted in yellow when changed.

iii) Redacted 'demand driven?' from Component 2 in this section and in Project Indicative Overview table. Redactions highlighted black.

iv) ? The \$88 million co-financing will focus towards ADB loan projects and will be parallel to the GFGM and footnote added below the main finance table. On \$5.8m - proportion of money, the split has not been confirmed but understanding is the majority of \$5.8m would be going directly towards grants going out from the mechanism (but wider than project implementation grants- e.g., PPG grants will also service core indicators as first significant step towards implementation so all grants would count). While Core Indicator targets are significant grants can contribute to improved management very well as local buy-in and involvement in IPLCs are core to the GFGM.

a.i) Section describing ToC and four causal pathways has been revised according to feedback and to include new Project Objective, likewise with assumptions listed in relation to this causal relationship underpinning the project's ToC. All additions highlighted yellow, and redactions highlighted black.

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v) Text has been added and is highlighted in yellow in the PIF.

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

HF April 10, 2026

Cleared.

HF March 11 2026

Cleared-though see related comment regarding existing GEF support to RFI sights.

Agency's Comments

ADB 26 March 2026

This will be further clarified in the text. Noted with thanks

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

HF March 30 2026

Cleared. c.) Please see question seeking further clarification of Annex J.

HF March 11 2026

a.) Please clarify the role of participating countries in the implementation of the GFGM; and how execution by BLI and CEPF is envisioned in each participating country and their role in this project globally/regionally. And a bit more clarity about where the GFGM will sit in terms of administering the granting mechanism.

b.) No exception to GEF policy on execution has been requested.

c.) The treatment of how the GFGM will be differentiated from yet cooperate with ongoing GEF investments in flyways/migratory bird conservation in Philippines and India needs to be addressed further given new GEF-8 flyways projects in both countries. Please see previous comment regarding overlap in the Philippines sites.

Agency's Comments

ADB 10 April 2026

Annex J is updated as requested

ADB 26 March 2026

a) Text added in 2.1.1. ?During the development of the FIS ? detailed consultation with governments, CSOs, IPLCs and other key actors will be undertaken. Through this process the specific needs for each country will be established and the role of government particularly will be carefully examined, such as in the selection of projects. This may lead to the development of a national steering committee for example. As CEPF has developed many similar such windows across multiple countries, the GFGM will build off their considerable experience to ensure the platform meets country needs and delivers for target organizations and conservation goals.?

Also for 2.1.3 ?In addition, by involving participating governments in the development of the FIS and then to have some role in the GFGM (to be determined during PPG stage) this will ensure that national priorities can be delivered.?

Also text added for 5.1 ?Depending on the structural set up for the GFGM for each country, such as setting up a national steering committees, monitoring and evaluation systems and processes.or stakeholder feedback will be developed and integrated with operational management plans?

b) Additional text added. ?It should be noted that as this project is focused towards Civil Society, IPLCs and Academia execution will not be delegated to governments?

c) Additional text added relating to Philippines, China and India ongoing GEF projects. ? Philippines text is most important and provided here as well. ?This project will run complementarily and in parallel to activities within the GFGM. During GFGM project design, any potential modalities for cooperation will be ascertained in alignment with GEF requirements. It could cover joint conduct of annual waterbird census, sharing of data on interventions, knowledge and lessons learned.?

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

HF March 30 2026

Cleared.

HF March 11 2026

a.i) It is unclear why sites with project preparation grants would be included in the calculation of targets for hectareage core indicators. Please explain and/or revise.

ii.) CI 6 GHG calculation: Given the exact sites, the ecological characteristics of those sites, and the activities aimed at addressing threats to those sites are unspecified at PIF stage, please redact targets for CI 6. Instead, once the strategy and site characteristics of the areas to be awarded the grants are known, please report during implementation on CI 6 results and submit accompanying ExAct GHG calculations.

b.) See this previous comment on: 2.1.3 "Project implementation grants to CSOs mobilized": How much of the \$5.8 million GEF and \$88.1 million co-finance in Component 2 will be dedicated to implementation grants? The intensity of this investment would clearly influence the extent to which this project would have on-the-ground impacts and achieve results contributing to the GEF core indicator targets. Particularly given implementation grants are only a portion of the grants planned (e.g. project preparation grants are also included). Further, noting that the CI targets for this project are quite ambitious, and need to better understand how the scale of the financing going to actual implementation translates into hectares on the ground. Please address also in the context of core indicator targets.

Agency's Comments

ADB 26 March 2026

a.i) Project Preparation Grants will make a considerable contribution to achievement of targets for core indicators based on hectareage. These grants will enable a range of activities that will

improve management or practices in wetlands sites eligible for the GFGM.

Activities include: feasibility assessments, ecosystem services assessments, business plan development, value chain analysis, multi stakeholder consultations and data collection. All activities produce data and knowledge at site level that will benefit stakeholders such as communities, developers, governments in management plans for these sites. Notably, Project Preparation Grants will often undertake activities that enable governments oversight of natural capital values and proof of concept at site level required to confidently engage investment from MFIs into nature based solutions (e.g., ADB through the RFI targeted at the same sites). They will also ensure that projects implemented by CSOs are evidence based, inclusive and viable. As such they will contribute in multiple ways to improved management and practices at selected sites and can therefore justifiably be seen to contribute to achievement of hectare targets.

ii) CI6 targets have been redacted, sentence added to justification to explain that these will be reported during implementation with submission of ExAct GHG calculations when site characteristics and strategies are known. Additional sentence highlighted yellow.

b). Of the 5.8 million GEF funds dedicated to Component 2, we would foresee the majority of these funds being disbursed as grants through the GFGM. These funds will support different types of grants (e.g., Project preparation, Project Implementation) all of which contribute to achievement of core indicators in eligible sites through funding work that will improve management and practices in eligible EAAF wetland sites. Core indicator targets and justification have been adjusted according to site information from the six participating countries. Whilst these are ambitious, it should be noted that some countries participating in the proposal (e.g., Mongolia and Papua New Guinea) include sites that are very large.

Regarding the co-financing, additional text has been included both as a footnote to the main Project Overview table as well as below the 'Indicative Co-financing Table'. These additions set out that the co-financing mobilized by ADB will be for loan projects and will be parallel to the GFGM but complementary.

GEF-8 Results Measurement Framework sheet (in ADB shared file) has been updated with data for sites in the six participating countries.

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

Secretariat's Comments

Agency's Comments

5.6 RISKS

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

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

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

Secretariat's Comments

HF March 30 2026

Cleared.

HF March 11 2026

a.) Please consider climate risk to the investment strategy/targeting of the proposed GFGM in the EAAF and how this will be built into the GFGM design/addressed in the project. Presuming this will be further developed in PPG as well.

b.) i. Under Risk table, please explain how the overall risk rating was identified.

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

c.) No. Please address.

Agency's Comments

ADB 26 March 2026

a) Climate Risks. Text added as follows: ?During the PPG Phase the project team will further look at climate risks and will particularly look to consider potential project interventions, both in terms of how they can address climate risks, but also how climate risks may impact the investment. The recently released ADB Resilience Explorer Tool will be used particularly to help with this process.?

b) i) Text added for the overall risk. Based on the information currently available at the PIF stage, which as listed above is a mix of low and moderate risk, the overall risk is conservatively rated as moderate. The project as noted as innovative and is developing a new platform focused only on CSOs and IPLCs etc. This is the first such platform to be created by ADB with the GEF and as such it has more risk associated with it than a traditional GEF project. Risks are mitigated by working through CEPF and through strong development during the PPG phase, where potential risks linking to government priorities and engagement can be further reduced.

b) ii) Rating changed to Moderate. Text added as follows ?During the PPG phase the environmental and social safeguards will be considered in detail and a framework will be put in place to ensure compliance with both GEF and ADB safeguards is in place. This project will be subject to ADB's ESF and as such the PPG phase will have to ensure that all necessary steps have been completed to ensure that obligations are in place.?

Unclear what c.) needs to be addressed ? happy to address as needed with further guidance

New text under Safeguards Rating also added.

The Safeguards Rating is considered to be Moderate at the moment and the initial screening is provided in Annex D. The project has a significant geographical scope and as the focus of the project will be to work with CSOs and IPLCs there will undoubtedly be some risks associated with the work such as ensuring FPIC is secured when working with IPs in particular locations. During the PPG stage there will be specific focus on addressing such risks and careful stakeholder engagement will be a primary mechanism for making that happen. The CEPF platform is well set up to ensure safeguard requirements are met, working already with the GEF and the World Bank Group for example. The GFGM as a new window under the CEPF would have existing structures in place, however if additional country specific requirements were also needed, these could also be developed.

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

HF March 11 2026

Yes. Partnering in the initial phase of the GFGM in Asia and the EAAF to support and engage CSOs and IPLCs along the flyway sets the stage for durable, sustained and increased financing and impacts in these critical ecosystems. There are ambitions and scope to scale to include other flyways and regions within GFGM.

Agency's Comments

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

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

Secretariat's Comments

HF March 30 2026

Cleared

HF March 11 2026

Please **identify which of the 23 targets** of the Kunming-Montreal Global Biodiversity Framework the project contributes to and **explain how**.

Please include alignment with CMS and Ramsar given the expected contributions of GFGM toward those complementary biodiversity MEAs.

Agency's Comments

ADB 26 March 2026

A table has been added to Section C ?Alignment with GEF-8 Programming Strategies and Country/Regional Priorities? which identifies which of the 23 GBF targets will be contributed to by the project with a brief explanation of what this contribution might represent

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

HF March 11 2026

Yes

Agency's Comments

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

Secretariat's Comments

HF March 30 2026

Cleared

HF March 11 2026

No, see previous comment and please do so.

Agency's Comments

ADB 26 March 2026

See response to 6.1

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

HF March 11 2026

Yes

Agency's Comments

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

Secretariat's Comments

HF March 30 2026

Cleared

HF March 11 2026

No. Please include.

It is well noted that the modalities for the engagement of civil society in this proposal will build on the lessons learned in GEF extensive partnerships with civil society such as in the Small Grants Program (SGP) and the whole-of-society approach envisaged in 9th replenishment of the GEF Trust Fund. That said, please provide a list of stakeholders consulted. In addition, please provide a summary of these consultations and how findings have been incorporated in project design.

Agency's Comments

ADB 26 March 2026

Text added Additional engagement and presentation to EAAF stakeholders on behalf of the GFGM specifically included bilateral meetings with the governments during EAAFP MOP12 from 14 ? 18 November 2025 Lao PDR, Philippines, Mongolia, Cambodia, Bangladesh, Malaysia, PNG and subsequent bilateral meetings in February / March 2026 with Viet Nam, Thailand, Indonesia and the PRC. A presentation on the GFGM as also provided during EAAFP MOP12 to potential stakeholders as well as to the Ramsar Asia Oceania Standing Committee Meeting on 4 March 2026. The EAAFP on behalf of the GFGM has also written to each government about the opportunity. Further information can be provided as needed.

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

Agency's Comments

Focal Area allocation?

Secretariat's Comments

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's Comments

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments

HF March 11 2026

Yes, \$10 million biodiversity set-aside.

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

HF March 11 2026

Yes

Agency's Comments

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

Secretariat's Comments

HF April 10, 2026

Cleared.

HF March 30 2026

- i.) The co-financing amount for EAAF partnership remains blank. Please populate.
- ii.) Cleared

HF March 11 2026

- i.) Under the cofinancing table, please provide the amount for the EAAF Partnership as source of financing.
- ii.) Also, if not answered in response to number 1, then is any co-financing expected from participating countries? Please include

Agency's Comments

ADB 10 April 2026

Co-financing from EAAFP has been entered in the relevant finance tables.

ADB 26 March 2026

- i) Text included for estimated co-financing amount from EAAFP.
- ii) At this stage no estimation for government co-financing is possible with a degree of certainty. However, during the PPG phase this will be considered and encouraged.

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

HF March 11 2026

Please see comment below.

Agency's Comments

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

Secretariat's Comments

HF April 10, 2026

Cleared.

HF March 30 2026

- 1.) Noting 5 LOEs included in PIF resubmission (Philippines, PNG, Indonesia, Mongolia, Lao)-but still missing Cambodia. Either: a.) Include valid LOE for Cambodia, or redact Cambodia from the PIF.
- 2.) The discrepancy has not yet been resolved. Please see the "General Project Information" section at the top of the Portal PIF entry. This currently lists Birdlife and Conservation International as executing partners, whereas the LOEs read: "executed by the Critical Ecosystems Partnership Fund (CEPF) and BirdLife International with involvement of the East Asian-Australasian Flyway Partnership (EAAFP)." Assuming that the LOEs are correct, then please include the same executing partners in the Portal PIF entry. The LOEs and the Portal PIF entry need to indicate the same executing partners for this project. Please contact GEFSEC PM if further clarification is needed.

HF March 11 2026

- 1.) Signed LOEs are included for 4 (Philippines, PNG, Indonesia, Mongolia) of the 11 countries included in the PIF (Bangladesh, Cambodia, China, Indonesia, Lao PDR, Malaysia, Mongolia, Papua New Guinea, Philippines, Thailand, Viet Nam). Signed LOEs must be included for all countries included in the PIF in order for WP consideration.
- 2.) All LoEs include Critical Ecosystems Partnership Fund (CEPF) and EAAFP as a key strategic regional partner for execution, whereas the Portal entry lists: CI and Birdlife as executing partners. Please revise the Portal entry (assuming the LOEs are correct...) to list CEPF and BirdLife as the executing partners which is consistent with the LOEs (and also include EAAFP IF it will execute-if not then, leave it off and specify in the PIF EAAFP's role if not execution).

Agency's Comments

ADB 10 April 2026

1. Cambodia LOE is still pending and with the GEF OFP. We are advised that it will be shared with us on Monday 13 April. If it is not received we will redact Cambodia.
2. The Portal entry information has been updated to show 3 GEF Executing Partners to align with the OFP LOEs. This may be reviewed during PPG phase and if necessary, we will seek fresh new LOEs from each country.

ADB 26 March 2026

- 1) LOEs have been obtained for four countries at this stage - Indonesia, Lao PDR, Papua New Guinea and the Philippines. Mongolia and Cambodia OFPs are making the required adjustments and we fully anticipate their participation and are working diligently to secure these for WP inclusion. The other countries have been redacted out, although during PPG phase we will continue to engage to confirm or formalize their participation.
- 2) ADB has resolved discrepancy between and match the portal entry with the letters.

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

Secretariat's Comments

HF April 10, 2026

Cleared.

HF March 30 2026

1.) Updated Mongolia LOE (including required footnote) is still missing. As is an LOE from Cambodia. Please submit LOEs that include the required footnote, or for Mongolia an email confirmation of this footnote text will suffice if a new LOE is not possible.

HF March 11 2026

1.) LoEs from Mongolia and Papua New Guinea are Portal - however, they missed the footnote "Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate". Please request an email from these OFPs accepting this footnote (this is an alternative to request a new LoE) and upload email confirmation to the Portal documents tab.

Please ensure any future/other LOEs for this project are consistent with the template and include the footnote.

Agency's Comments

ADB 10 April 2026

Mongolia - there is a new email attached to the OFP LOE which acknowledges the required GEF footnote from the template. For Cambodia, please see above.

ADB 26 March 2026

Please see above.

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

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

HF March 11 2026

Yes. Clear.

Provided a map of 159 EAAFP Flyway Network Sites. Grants will go to CSOs working for the conservation and management of approximately 25% of these sites, but which ones are not known at PIF stage.

Agency's Comments

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

HF March 30 2026

Cleared.

HF March 11 2026

No. Please address.

We note that ADB said that a project's overall ESS risk is classified as Moderate.

1.) At PIF stage, please provide environmental and social risk screening documents and explain actions that ADB will take during PPG, including further development of environmental and social risk assessment and environmental and social risk management plan with clear actions, roles, budget, and timeline.

2.) An Environmental and Social Safeguards in D. Policy requirements (PIF, page 55) said Moderate risk. However, the environmental and social risk in the Key Risks table mentioned Low risk (PIF, page 51). Please make these risks consistent.

3.) Please elaborate further about information on how the project consulted with key stakeholders including vulnerable populations and Indigenous Peoples at PIF stage, and how the results of consultations were integrated into the project concept (PIF).

4.) Please include Indigenous Peoples and Indigenous Peoples groups as partners of the project.

5.) Please ensure obtaining Free, Prior, and Informed consent (FPIC) from Indigenous Peoples if there are Indigenous Peoples in and around the project areas, during PPG about project design and throughout project implementation with enough budget allocation.

6.) Please consider integrating Indigenous Peoples and local communities' governance, capacity building, and traditional and local knowledge, and ensuring security of tenure of Indigenous Peoples and local communities as a part of project activities, particularly Component 2 and 3.

Agency's Comments

ADB 26 March 2026

Detailed Risk Screening has been completed as per the updated ADB ESF and Annex D has now been included.

All areas listed are included in the screening. As noted throughout, the potential sites are not yet known so screening is preliminary and further work will be done during the PPG phase.

In addition, screening at the project level will also be needed and potential impacts will be managed during implementation. Careful mitigation and management will need to be put in place as expected.

Annex E: Rio Markers

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

Secretariat's Comments

HF March 11 2026

Yes

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments

HF March 11 2026

Yes

Agency's Comments

Annex G: NGI Relevant Annexes

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

Secretariat's Comments

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments

HF April 10, 2026

Yes, all OP and PM comments sufficiently addressed. PM recommends this project for clearance and consideration for WP 71 inclusion.

HF March 31 2026

Not yet. Prior to resubmission please address all comments including a response to each comment in review sheet; a specific reference to which documents; and where revisions were made to the documents to ease re-review process. Please redact all highlights from PIF.

HF March 11 2026

Not yet. Prior to resubmission please address all comments including a response to each comment in review sheet; a specific reference to which documents; and where revisions were made to the documents to ease re-review process.

Agency's Comments

ADB 10 April 2026

Highlights removed.

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

Secretariat's Comments

HF March, 2026

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

2.) Please consider including monitoring indicators related to integration of Indigenous Peoples and local communities? governance, capacity building, and traditional and local knowledge, and

ensuring security of tenure of Indigenous Peoples and local communities and disaggregating Indigenous Peoples beneficiaries in the project areas during PPG.

3.) During PPG, or once it is clear during flyway strategy development and/or granting process, please report the:

- Under C.I. 1.2: Name of the Protected Area, WDPA ID, and IUCN Category.
- Under C.I. 2.2: Name of the Protected Area, WDPA ID, and IUCN Category.

4.) Potential project sites that are already receiving GEF-8 resources will not be eligible for further GEF-8 resources via GFGM without prior justification, review and GEFSEC approval. Will include that in the CER comments as well.

5.) Please use the CEPF indicator framework (which has previously been GEF reviewed and approved) as a basis to develop the indicator framework for GFGM which will ensure consistency and integrity of results measurement and reporting.

6.) Please include alignment with CMS and Ramsar given the expected contributions of GFGM toward those complimentary biodiversity MEAs.

7.) If additional countries will be included in GFGM please submit valid LOEs at CEO endorsement stage.

Agency's Comments

ADB 10 April 2026

Super guidance. Much appreciated.

ADB 26 March 2026

ADB will ensure that the gender analysis and the GAP developed during the PPG stage are fully integrated into the project documents and aligned with all project components. The results framework will include gender-specific indicators to monitor and report on outcomes. Measures to facilitate GAP implementation such as dedicated budgets and regular monitoring will be specified. References to gender-specific results and GAP implementation will be included in PIRs, MTRs and TE.

A concise Gender and Social Inclusion Annex has been prepared for attachment to the PIF, integrating both gender and IPLCs considerations. It summarizes key barriers, proposed Gender Action Plan activities, and specific indicators. The annex ensures that women and IPLCs are meaningfully included in decision-making, capacity building, benefit-sharing, and knowledge integration in flyway conservation.

During the PPG and/or the flyway strategy development and granting process, we will provide the requested details under the relevant conservation indicators.

Review Dates

First Review

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)

PIF Review

3/11/2026

3/31/2026

4/10/2026

Agency Response