

Promoting Conservation, Sustainable Utilization and Fair and Equitable Benefit-sharing from Lesotho's Medicinal and Ornamental Plants for Improved livelihoods

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

9799

Countries

Lesotho

Project Name

Promoting Conservation, Sustainable Utilization and Fair and Equitable Benefit-sharing from Lesotho's Medicinal and Ornamental Plants for Improved livelihoods

Agenices

UNDP

Date received by PM

5/28/2019

Review completed by PM

Program Manager

Jaime Cavelier

Focal Area

Biodiversity

Project Type

FSP

PIF ☐

CEO Endorsement ☐

Project Design and Financing

1. If there are any changes from that presented in the PIF, have justifications been provided?

Secretariat Comment at CEO Endorsement

6-5-19

Yes. There is a table with the structure at PIF and CEO Endorsement.

Cleared

Response to Secretariat comments

2. Is the project structure/ design appropriate to achieve the expected outcomes and outputs?

Secretariat Comment at CEO Endorsement

6-5-19

Component 2.

Outcome 2.1. Please elaborate on the actual R&D activities to be carried out in the target species. In Table 1 of the Project Document it says "*Research is limited to genotoxicity, microbiological, and antioxidant testing*" for *Pelargonium sidoides* and *Hypoxis hemerocallidea*. For *Aloe polyphylla* it says "*under the project R&D will not be supported*" (If so, why is this species in the project?). The R&D agenda needs to be expanded in the body of the project. Please include a table with the name of the species, the specifics of the R&D and the responsible party. This should be clear and explicit enough to understand this part of the project at a glance.

Outcome 2.2. This comes as a surprise because the proposed activities relate to bio-trade of a commodity, and not to the value chains of products derived from R&D. There is very clear language in the Project Document stating that these species are traded in bulk as any other commodity. These activities should not be included in this project.

Page 26 of Project Document: In essence there is no processing of the material in Lesotho; thus there is a potential for introducing minimal processing in the form of cleaning, drying, packaging, and marketing to improve the value of the raw material on the part of the local communities. Accordingly, the project will support small/medium-scale community-based enterprises, including women-run operations, to add value to P. sidoides production as well as to H. hemerocallidea, which is one of the most locally traded plants in Lesotho and other parts of Southern Africa.

Outcome 2.3. What are the ABS agreements that this component refer to and why the use of PIC, MAT and Benefit Sharing for what is effectively bio-trade of a commodity?

Output 2.3.1. Are there going to be investments in the conservation areas [Tšehlanyane National Park (5,600 ha), the Bokong Nature Reserve (1,972 ha), the Sehlabathebe National Park (7,000 ha), the Letšeng-la-Letsie Ramsar site (4,000)], and their buffer areas where the plants are being extracted, going to benefit from the project?

Output 2.3.2. Why developing ABS deals between providers and users of Khora when the plant is traded as a commodity, and why *Model ABS agreements cognizant of the pharmaceutical business models*, when there are no pharma products resulting from R&D?

Page 27 of Project Document: Consultations conducted during the PPG phase with the LRA indicate that there is currently no basis for assessing export duties because no processing is done on the material in Lesotho but it is instead exported as raw material.

Output 2.3.4. Gene banks not supported by the GEF.

10-20-19

Outcome 2.1. Root extracts of *P. sidoides* are marketed and sold in the internet with the suggested therapeutic properties as described in the PIF. What are the specifics of the "*screening for bioactive compounds*" for the "*formulation of suitable pharmaceutical preparations for the markets*". What makes this ultimate goal different from what is already available in the web? More information on the screening of the compounds may provide answer to this question. A similar set of questions apply to the R&D on *Hypoxis hemerocallidea* and *Aloe polyphylla*. For *Hypoxis*, what are the essays to be conducted with the extracts to determine the "*anti-androgenic and anti-inflammatory properties that could help to overcome urinary problems*"? For the *Aloe*, what essays will be conducted to determine the active compounds that have the "*skin and body-aging properties and to treat cuts, sunburns and scrapes*"? One thing is the sophisticated techniques to obtain pure extract of certain compounds, yet another to determine the activity of these extracts on the proposed pharmaceutical applications.

Outcome 2.2 How can the project aim at "*developing ABS-compliant value chains for products derived from R&D that have pharmaceutical properties*" when as stated in Outcome 2.1, this will not be achieved in the project, only the extraction or purification of compounds to be believed to have these properties?

Outcome 2.3 This issue remains as long as the issue related to the R&D issues flagged in the two points remain. These agreements are all fine, except that they continue to refer to trading of plant extracts with unproven pharmaceutical properties.

Output 2.3.1. These investments are fine but the rationale for the conservation of the PAs and the species should not be under the umbrella of the Nagoya Protocol as critical issues remain unresolved about the extent to which the R&D agenda lead to linking the extracted compound with the suggested pharmaceutical activity.

Output 2.3.2. Same issues as above. How can the project suggest supporting “*ethical bio-prospecting and R&D*” to identify valuable genetic resources (i.e. bioactive compounds) that can be used to develop pharmaceutical products to treat various ailments (based on TK)” when beyond extraction of purified compounds will not be able to pin point the activity of these compounds claiming pharmaceutical applications?

The budget associated with the proposed activities associated with "bio-prospecting" need to be reviewed in light of the comments made above.

NOTE: The GEF Sec suggest a conference call to discuss these matters before a re-submission of the project.

Response to Secretariat comments

Question 2. Is the project structure/design appropriate to achieve the expected outcomes and outputs?
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6-5-19

Component 2.

Outcome 2.1. Please elaborate on the actual R&D activities to be carried out in the target species. In Table 1 of the Project Document it says "*Research is limited to genotoxicity, microbiological, and antioxidant testing*" for *Pelargonium sidoides* and *Hypoxis hemerocallidea*. For *Aloe polyphylla* it says, "*under the project R&D will not be supported*" (If so, why is this species in the project?). The R&D agenda needs to be expanded in the body of the project. Please include a table with the name of the species, the specifics of the R&D and the responsible party. This should be clear and explicit enough to understand this part of the project at a glance.

09/26/2019

Outcome 2.1:

In response to this recommendation, the project's R&D agenda under Outcome 2.1 has been made explicit in a table that identifies the species, the specifics of the R&D objective, and the responsible parties - as described in the table below (this table also includes details of the methodology to be followed, though full details of this have not been included in the Prodoc). It is important to note that all R&D will be directed to screening for bioactive compounds that can be developed into products to treat ailments based on traditional uses in Lesotho (not on current usage practiced elsewhere).

Plant species	Indicative R&D Objective	National R&D Institution	Potential International Partner Institution in R&D
<i>Pelargonium sidoides</i> (Khoara)	The species is currently harvested in the wild for a bioactive substance found in its lignotubers, which is processed and used by local and international pharmaceutical industries. The project will conduct R&D to explore the antioxidant effects of <i>P. sidoides</i> , which is rich in antioxidants such as flavonoids, phenolic acids (including gallic acid), and tannins. Products derived from <i>P. sidoides</i> could be marketed as a dietary supplement/extract to prevent damage through oxidation of vital cell molecules, including DNA and proteins, which are responsible for many body processes.	NUL, Department of Agricultural Research	Nimura Genetic Solutions (Japan) University of Johannesburg (South Africa)

Laboratory methodology for *P. sidoides*:

Having obtained prior informed consent (PIC), the *P. sidoides* tubular roots will be collected from selected areas in Lesotho and will be authenticated. A voucher specimen will be deposited into the Lesotho Herbal Medicines Repository (LHMR) and monograph that was established at the Department of Pharmacy of the National University of Lesotho by E. Mugomeri et al. (2016). The solution of ethanolic extract of *P. sidoides* dried powdered roots will be subjected to antioxidant screening. The bioassay directed fractionation will be performed to obtain fractions

UNDP-GEF Project Document, IV: Strategy

Pg. 12, paragraph 30

And

Pgs 15 & 16, Table 1

UNDP-GEF Prodoc, V: Results and Partnerships

Page 24, paragraph 54, and table

And

Pg. 25, paragraph 57, and page 26, especially bullets 5 and 7 (top of page)

And

Pg. 25, paragraph 57, and overpage (p.26), bullets 5 and 7

<p>6-5-19</p> <p>Outcome 2.2. This comes as a surprise because the proposed activities relate to bio-trade of a commodity, and not to the value chains of products derived from R&D. There is very clear language in the Project Document stating that these species are traded in bulk as any other commodity. These activities should not be included in this project.</p> <p><i>Page 26 of Project Document: In essence there is no processing of the material in Lesotho; thus there is a potential for introducing minimal processing in the form of cleaning, drying, packaging, and marketing to improve the value of the raw material on the part of the local communities. Accordingly, the project will support small/medium-scale community-based enterprises, including women-run operations, to add value to P. sidoides production as well as to H. hemerocallidea, which is one of the most locally traded plants in Lesotho and other parts of Southern Africa.</i></p>	<p>Outcome 2.2:</p> <p>Activities under Outcome 2.2 have been reformulated to reflect that the project will develop ABS-compliant value chains for products derived from R&D that have pharmacological applications, and will not support activities related to biotrade. The focus of Outcome 2.2. is now to promote sustainable harvesting, value addition, and benefit-sharing from genetic resources derived from <i>P.sidoides</i> and <i>H. hemerocallidea</i>. Activities relating to biotrade have been removed from the project, as recommended by GEFSec.</p> <p>Under <u>Output 2.2.1</u>, the ABS-related activities are as follows</p> <ul style="list-style-type: none"> · Conduct research on the three select species within and outside protected areas (buffer zones) focusing on characterization of the habitat, spatial distribution, population status, collection practices and harvest impact studies, collection intensity and species regeneration to generate harvesting and propagation data, growth habits, recovery, and monitoring. · Conduct baseline assessment for the participation of members of local communities in the four prioritized sites, including women, in ABS value chains for the three plant species, as providers of raw material and TK to researchers (e.g., NUL, Nimura Genetic Solutions, and University of Johannesburg - South Africa). · Conduct capacity building and training of community members, including women's groups and herders, for sustainable harvesting and preliminary processing of plant genetic material to be provided for R&D purposes. · Promote <i>in-situ</i> conservation of selected plant species under protected areas and military/police installations, and communal land in the buffer and transition zones, with the participation of CCFs and community councils. · In cooperation with the Katse Botanical Garden, promote <i>ex-situ</i> suitability studies for propagation in community botanical gardens and household nurseries, including promoting the participation of women and youth in the ABS value chains. 	<p>UNDP-GEF Project Document, V. Results and Partnerships</p> <p>Page 26, paragraph 59</p> <p>And</p> <p>Page 27, paragraph 60</p>

<p>6-5-19</p> <p>Outcome 2.3. What are the ABS agreements that this component refer to and why the use of PIC, MAT and Benefit Sharing for what is effectively bio-trade of a commodity?</p>	<p><u>Outcome 2.3: ABS agreements</u></p> <p>The kinds of agreements that the project will put in place in respect of use and trade in genetic resources derived from <i>P.sidoides</i> will include:</p> <ul style="list-style-type: none"> · Memoranda of Understanding between providers and users of genetic resources, identifying communities as resource custodians, or intended resource custodians, with strong rights to access, use, manage and benefit from the use of products derived from them · ABS agreements determining how monetary and non-monetary benefits will be shared between providers and users of the genetic resources and establishing favourable conditions for ABS; · Material Transfer Agreements and Prior Informed Consent with regard to access to and use of the identified genetic resources and traditional knowledge (TK) associated with these. · ABS contracts with international pharmaceutical companies <p>These agreements will be developed and negotiated in line with the relevant national ABS regulations and guidelines that will be developed by the project under Component 1, and in full compliance with the Nagoya Protocol.</p> <p>See <u>Outputs 2.3.2 and 2.3.3</u>, Prodoc pages 28 & 29, paragraphs 63 and 64</p>	<p>UND-GEF Prodoc, V: Results and Partnerships</p> <p>Page 28, paragraph 63, and page 29, paragraph 64</p>
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<p>6-5-19</p> <p>Output 2.3.1. Are there going to be investments in the conservation areas [Tšehlanyane National Park (5,600 ha), the Bokong Nature Reserve (1,972 ha), the Sehlabathebe National Park (7,000 ha), the Letšeng-la-Letsie Ramsar site (4,000)], and their buffer areas where the plants are being extracted, going to benefit from the project?</p>	<p>There will be investments through Output 2.3.1 in protected areas, and their buffer zones, where the plants are being harvested. In particular, the project will facilitate completion and publication of the Biodiversity Management Plan for <i>P.sidoides</i>, and the development and publication of a Biodiversity Management Plan for <i>H. hemerocallidea</i>. These plans will be important tools used by protected area managers, and other law enforcement officers (e.g. at military/police installations) for ensuring the protection, sustainable harvesting and monitoring of the species within protected areas and other natural habitats, and to manage and mitigate threats to wild populations of the target species.</p> <p>In addition, as part of the ABS agreements and mutually agreed terms (MAT) for conducting R&D on <i>P. sidoides</i> and <i>H. hemerocallidea</i>, all of the named protected areas (Tšehlanyane National Park, 5,600 ha; the Bokong Nature Reserve, 1,972 ha; the Sehlabathebe National Park, 7,000 ha; and the Letšeng-la-Letsie Ramsar site, 4,000 ha), and their buffer areas, will benefit from:</p> <ul style="list-style-type: none"> (i) strengthening capacity for administration and enforcement of access regulations (non-monetary benefits); (ii) special fees (monetary benefits) to be paid to support the conservation of the selected species within protected areas, as well as for monitoring of populations and enabling re-introduction (in line with the Biodiversity Management Plans developed under Output 2.3.1). 	<p>UNDP-GEF Prodoc, V: Results and Partnerships</p> <p>Output 2.3.1, page 28, paragraph 62</p> <p>And</p> <p>Output 2.3.2., pg. 28, paragraph 63, bullet 3</p>
<p>6-5-19</p> <p>Output 2.3.2. Why developing ABS deals between providers and users of Khora when the plant is traded as a commodity, and why <i>Model ABS agreements cognizant of the pharmaceutical business models</i>, when there are no pharma products resulting from R&D?</p> <p><i>Page 27 of Project Document: Consultations conducted during the PPG phase with the LRA indicate that there is currently no basis for assessing export duties because no processing is done on the material in Lesotho but it is instead exported as raw material.</i></p>	<p>The project will support the development of ABS-related value chains for commercially viable natural products based on genetic resources derived from targeted medicinal plants in Lesotho, and identified through research and development (including technological applications), as described under Outcome 2 in the Prodoc (see page 24, paragraph 54). ABS deals (as described above), will, therefore, be appropriate.</p> <p>It is the intention of the project to support ethical bioprospecting and R&D to identify commercially valuable genetic resources (i.e. bioactive compounds) that can be used to develop pharmaceutical products to treat various ailments (based on TK). This is the rationale for developing model ABS agreements with relevant companies based on pharmaceutical business models, to govern both export and local pharmaceutical industrial development of the identified genetic resources, to ensure transparency and cooperation, and equitable access and benefit-sharing – as described under Output 2.3.3.</p>	<p>UNDP-GEF Prodoc, V: Results and Partnerships</p> <p>Page 24, paragraph 54</p> <p>And</p> <p>Page 28 & 29, paragraph 64</p>

Output 2.3.4. Gene banks not supported by the GEF	Output 2.3.4 has been removed from the project as it was indicated that gene banks are not supported by the GEF. The associated resources were reallocated to support R&D for ABS products under <u>Outcome 2.1.</u> , with allocations under Contractual Services (Companies), Equipment and Furniture and Materials and Goods.	UNDP-GEF Prodoc, V: Results and Partnerships Output 2.3.4. has been removed from page 29 And see Section XI: Total Budget and Workplan , Budget notes 13, 14 and 15 (pages 61 and 62)
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3. Is the financing adequate and does the project demonstrate a cost-effective approach to meet the project objective?

Secretariat Comment at CEO Endorsement

6-5-19

Based on the above, remove or reformulate (significantly) outcomes 2.2. and 2.3 and reallocate funding to 2.1

Is it necessary to use of \$317,080 for Component 3 in light of comments on outcomes 2.2. and 2.3.

10-20-19

1. The project charged \$36,522 for “Direct project Costs” (Details on the items are in Annex J). This charge needs to be removed since the associated activities need to be carried out by Executing Agency. Budget to be reallocated.

2. The Audit should be charged to PMC not M&E. Budget to be revised.

3. Why is there a charge for Stakeholder Engagement and Gender Plans if these two activities were already carried out for the preparation of the CEO Endorsement. Please remove and reallocate the budget to the components.

4. The project charged percentages of the Project Manager and Finance & Administration Officer to Components 1&2. These two salaries need to come out of the PMC.
5. The project charged the Annual External Audi to Component 3. This should be charged to PMC.

Response to Secretariat comments

09/26/2019

Outcomes 2.2 and 2.3 were **significantly reformulated** to address the comments under Question 2 above. The R&D activities to be carried out for the target species are specified above and will include value chains of products derived from R&D for pharmaceutical products, ABS deals between providers and users of *Khoara* (*P. sidoides*) and Model ABS agreements cognisant of the pharmaceutical business model.

Additional resources have been allocated to Outcome 2.1. from the removal of Output 2.3.4. (see explanation under Output 2.3.4 above)

No changes were made to the budget allocated for **Component 3** after the reformulation of Outcomes 2.2 and 2.3. These resources will still be needed to effectively implement project-related gender mainstreaming, knowledge management, and M&E activities. These include not only knowledge management activities related to the value chains of ABS products derived from R&D, but also carrying out activities to comply with new UNDP and GEF requirement regarding social and environmental safeguards, including the development of an Indigenous Peoples Plan based on the Indigenous Peoples Planning Framework developed during the PPG (Prodoc, page 30, last bullet at top of page).

In addition, as part of the knowledge management strategy the project may participate in the Pan African Community of Practice, developed under the UNDP-GEF Global ABS Project (GEF ID 9255), to share experiences and expertise regarding ABS initiatives in the African Region (Page 30, paragraph 69, last bullet)

**UNDP-GEF Project Document, V.
Results and Partnerships**

See page 30, last bullet at top of page
(development of Indigenous People's Plan)

See page 30, paragraph 69, last bullet

4. Does the project take into account potential major risks, including the consequences of climate change, and describes sufficient risk response measures? (e.g., measures to enhance climate resilience)

Secretariat Comment at CEO Endorsement

6-5-19

Why is there no reference to the risk of being out-compete in the R&D agenda on the target species? Who else is working on the proposed research activities (internationally), knowing that there are multiple entries on the the extracts and claimed properties of the two species?

10-20-19

Nimura Genetic Solutions should know who else is working in the field and determine the risks of being out-compete. Please consult.

Response to Secretariat comments

09/26/2019	
The risk of being outcompeted in the R&D agenda on the target species has been added to the project's risks as suggested (Impact rating = 3; probability rating = 4) as . To mitigate this risk, the project will maintain close communication with the research team of the NUL/Department of Pharmacy and Nimura Genetic Solutions regarding R&D developments. There is no information available at this time regarding who else is working on the proposed research activities (internationally); this information will be obtained during the early stage of project implementation, and based on this information, the risk mitigation strategy will be updated.	UNDP-GEF Project Document, Annex I: UNDP Risk Log Risk 13

5. Is co-financing confirmed and evidence provided?

Secretariat Comment at CEO Endorsement

6-5-19

The LoC from UNDP says that the co-financing is in cash and in the Portal that it is in-kind. Please address.

10-20-19

Please confirm that the new LoC from UND was uploaded. Thanks.

Response to Secretariat comments

Cofinance from UNDP will be in-kind. See corrected LoC..	UNDP Letter of Commitment
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6. Are relevant tracking tools completed?

Secretariat Comment at CEO Endorsement

6-5-19

Indicators provided. Are the areas of impact inside and/or outside of the PAs mentioned in the project?

10-20-19

Cleared

Response to Secretariat comments

09/26/2019	
Project impact will be mostly outside of PAs, and harvesting of plant resources will only occur outside PAs; however, the project will monitor the populations of the three plant species inside PAs and will conduct activities for re-introduction of the species into wild PAs.	No change in documentation

7. Only for Non-Grant Instrument: Has a reflow calendar been presented?

Secretariat Comment at CEO Endorsement NA**Response to Secretariat comments**

8. Is the project coordinated with other related initiatives and national/regional plans in the country or in the region?

Secretariat Comment at CEO Endorsement

6-5-19

Yes. What is the specific research agenda for the target species *P. sidoises* in the GEF funded project in South Africa (ID 9255)?

10-20-19

Cleared

Response to Secretariat comments

09/26/2019

There is no specific research agenda related to ABS for *P. sidoides* in the GEF-funded project in South Africa (ID 9255). This project will focus on the implementation of the Pelargonium Biodiversity Management Plan (BMP) through the Pelargonium Working Group (PWG). The BMP will lead to the implementation of sustainable management practices for wild populations of *P. sidoides* and improving value chains for the plant along lines of biotrade.

The relationship between this project and the related ABS project in South Africa (GEF ID 9255) is reflected on page 31 of the Prodoc, bottom paragraph. The following table indicates the similarities and differences between the two projects regarding activities related to *P. sidoides*.

GEF project	R&D	Other activities
GEF ID 9255 (South Africa)	Not considered	- Update and implement the Pelargonium BMP - Improve existing value chains for the plant along lines of biotrade
GEF ID 9799 (Lesotho)	Antioxidant effects of <i>P. sidoides</i> to be developed as a dietary supplement	- Update and implement the Pelargonium BMP - Develop new value chains of products derived from R&D

**UNDP-GEF Project Document, V.
Results and Partnerships**

**Page 31, Partnerships: bottom
paragraph**

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

Secretariat Comment at CEO Endorsement

6-5-19

Yes

Cleared

Response to Secretariat comments

10. Does the project have descriptions of a knowledge management plan?

Secretariat Comment at CEO Endorsement

6-5-19

Yes

Cleared

Response to Secretariat comments

Agency Responses

11. Has the Agency adequately responded to comments at the PIF stage from:

GEFSEC

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

STAP

Secretariat Comment at CEO Endorsement

6-5-19

One of the main points made by STAP at PIF stage was on the matter of ownership of the pant resources:

the project should focus on communities as resource custodians or intended resource custodians with strong rights to access, use, benefit from, manage and exclude others from medicinal plants as a priority, and as a key goal of the project.

This matter needs to be properly addressed in the CEO Endorsement with very clear and explicit interventions.

10-20-19

Cleared

Response to Secretariat comments

STAP

<p>6-5-19</p> <p>One of the main points made by STAP at PIF stage was on the matter of ownership of the plant resources:</p> <p><i>The project should focus on communities as resource custodians or intended resource custodians with strong rights to access, use, benefit from, manage and exclude others from medicinal plants as a priority, and as a key goal of the project.</i></p> <p>This matter needs to be properly addressed in the CEO Endorsement with very clear and explicit interventions.</p>	<p>09/26/2019</p> <p>The legal basis for ensuring that communities are resource custodians(or intended resource custodians ,with rights to access, use, benefit from, manage, and exclude others from access to medicinal plants as a priority), will be achieved through:</p> <p>(i) Output 1.3.1, in line with guidelines and procedures for obtaining PIC and MAT (Prodoc page 22, paragraph 50)</p> <p>(ii) Output 1.3.2, the development of biocultural community protocols governing management, ownership, access rights, and benefit-sharing rules and procedures of genetic resources. These ABS-related regulations will complement existing regulations (e.g., Historical Monuments, Relics, Fauna and Flora Act 41 of 1967/ as amended by Legal Notice No. 93 of 2004, and the Environment Act No. 2008) that protect local communities and provide local authorities (chiefs and community councils) with the terms for exploiting plant resources from their jurisdictions. (Prodoc page 23, paragraph 51)</p> <p>(iii) Output 1.1.3: - Local/Community Councils By-laws in the prioritized districts (guidelines) on ABS reviewed and finalized considering national frameworks on ABS and Biodiversity. This was added to the project (though originally not included in the PIF), because local/community council by-laws for accessing and using genetic resources, including medicinal plants, are already being used to ensure that communities are resource custodians or intended resource custodians with rights to access, use, and benefit from the use of genetic resources. (Prodoc page 19, paragraph 43)</p> <p>(iv) Output 2.3.2, ABS deals with monetary and non-monetary benefits negotiated between providers and users of <i>P. sidoides</i> (locally known as Khoara) will be developed, identifying local communities as resource custodians or intended resource custodians with strong rights to access, use, manage, and benefit from the use of <i>P. sidoides</i>. (Prodoc, page 28, paragraph 63)</p>	<p>CEO ENDORSEMENT REQUEST, ANNEX B: RESPONSES TO PROJECT REVIEWS</p> <p>Point 9, pages 33 and 34</p>
<p>Other changes</p>		

Prodoc SECTION XIII RISK MANGEMENT	At the request of UNDP-GEF HQ, this entire section, paragraphs 148 to 163 (pages 65 to 68) has been replaced with text from the new Prodoc template released in July 2019	UNDP-GEF Prodoc, XIII: Risk Management Pages 65 – 68, Paragraphs 148 to 163
Minor editorial corrections and improvements	Minor editorial corrections and improvements have been made throughout the document. In some places this has resulted in small shifts in distribution of text cross page-breaks.	Throughout the Prodoc

GEF Council

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

Convention Secretariat

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

Recommendation

12. Is CEO endorsement recommended?

Secretariat Comment at CEO Endorsement

6-5-19

No. Please address outstanding issues. Thanks.

10-20-19

No. Please address outstanding issues listed under items 2,3,4 & 5. The GEF Secretariat remains available to discuss this review before working on a revised CEO Endorsement.

Response to Secretariat comments

9-26-19

Many thanks for your comments. They have been addressed as stated in the responses above.

Review Dates

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

First Review		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		

CEO Recommendation

Brief Reasoning for CEO Recommendations