

## Strengthening the Implementation of National Biosafety Frameworks in Southern Africa (SINBF)

### Basic Information

**GEF ID**

10584

**Countries**

Regional (Congo DR, Madagascar, Namibia)

**Project Title**

Strengthening the Implementation of National Biosafety Frameworks in Southern Africa (SINBF)

**GEF Agency(ies)**

UNEP

**Agency ID**

UNEP: 01809

**GEF Focal Area(s)**

Biodiversity

**Program Manager**

Mark Zimsky

# PIF

## Part I – Project Informatics

### Focal area elements

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

#### Secretariat Comment at PIF/Work Program Inclusion

4-7-20

The project is aligned to BD-3-8 Further development of biodiversity policy and institutional frameworks through the Implementation of the Cartagena Protocol on Biosafety.

Cleared

#### Agency Response

### Indicative project/program description summary

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

#### Secretariat Comment at PIF/Work Program Inclusion

4-7-20

Table B

This is really a Multi-country project (as stated in the title), and not a Regional one. Thus, the project needs to remove reference to Regional activities and concentrate on the relevant activities for each of the participating countries in each of the proposed outputs. Suggest looking for issues of implementation that are common to the 3 countries and build the project around that. This does not preclude the inclusion of outstanding issues of implementation of the CPB particular to the 3 countries countries. Since the implementation of the CPB should be advanced in the countries that Ratified the protocol more than 15 years ago, this project needs to have a sharper focus and be to the point. Drop language that may obscure the needs of the countries.

#### COMPONENT 1

Output 1.1. While it is the mandate of the GEF to support capacity building for the implementation of the CPB, at this stage it is necessary to separate the needs for training programs for the participating countries as they have made different progress in complying with the provisions since the time they ratify the Protocol: DRC (Jun 21, 2005), Madagascar (Feb 22, 2004) and Namibia (May 11, 2005).

Output 1.2. There is no justification for a “Regional Biosafety Network” for 3 countries. Information and advice can be provided by the roster of experts on biosafety established by the Conference of the Parties to the CBD back in 2000. The Roster is accessible and searchable through the Biosafety Clearing-House (BCH).

Output 1.3. It is not clear to the GEF what this output means. The items listed here can and should be resolved at the national level and use the available resources offered by the CBD Secretariat and the BCH. What is a Regional BCH?

If the participating countries are in need of additional institutional capacity building, this Component needs to be refined to reflect the differences among the participating countries. Suggest selecting a few issues of common interest and frame the component around them. Consider that the GEF funding per country is variable and that the Component counts on only \$800,000 + the recurrent costs provided by the Governments + RAEIN-Africa.

#### COMPONENT 2

Output 2.1 Please clarify what the participating countries need a “*Situational Analysis Report*” when this information will be gathered for the preparation of the Fourth National Biosafety Reports to the Cartagena Protocol on Biosafety. The GEF will be providing funding for that report.

Output 2.2. This output as stated is way beyond the funds and time available for this project. If countries need to update their national biosafety regulatory regimes, search for common needs and reframe the output.

Output 2.3 Not clear about the timing of this activity considering that Namibia already updated its NBSAP (2013-2022), as well as Madagascar (2015-2025). DRC has an NBSAP for the period of 2016-2020. Any additional Funds for the CPB should be used for the implantation as there is already enough roadmaps on where the BD agenda of the countries is taking them.

#### COMPONENT 3

Output 3.1. The need and gains of the harmonisation of the administrative and technical tools to supporting implementation of national biosafety systems is clear.

Output 3.2 The GEF suggest looking on common themes for the implementation of the CPB for technical assistance like the “operationalization of Monitoring & Enforcement systems to support pre- and post-approval of LMOs”.

#### COMPONENT 4

Is it necessary to spend GEF’s \$410,000 for this component? What is the objective of this “*comprehensive project monitoring and evaluation (M&E) framework developed and implemented drawing on best practices*” and what is its cost?

9/17/2020

Cleared.

#### Agency Response

UNEP:15/04/2020

Project Title edited to “ Multi-Country Project for Strengthening the Implementation of National Biosafety Frameworks in Southern Africa (MCP-SINBF)”

The project outcomes and outputs per the review guidance provided has been reorganized into two Technical components and a Project Monitoring and Evaluation Component

All references to regional project interventions either deleted or rephrased to capture the multi-country focus

Component 1 – Institutional Capacities and Human Resource base for Biosafety Implementation

Outcome 1. Edited with reference to “Regional” deleted

Outputs 1.1 – 1.3 redesigned into new Output 1.1 focusing on specific institutional and technical capacity building key on common areas of thematic interventions on Risk Assessment, Risk Management, monitoring and enforcement, transit measures and port handling to support the 3 designated Competent National Authorities and specific interventions on LMO Testing for Namibia.

Components 2 and 3 reorganised to Component 2 – Biosafety Regulatory Regimes and Policy

Outputs 2.1 – 2.3 and 3.1 – 3.2 reorganised to new Outputs 2.1 – 2.2 focusing on a new Ten-Year Biosafety Strategic plans and policies, Review and update of Biosafety regulatory and policy regimes with harmonised administrative systems including technical procedures, guidelines and Standard Operating Procedures to support handling, transit measures, monitoring and enforcement in the implementation of

guidelines and Standard Operating Procedures to support handling, transit measures, monitoring and enforcement in the implementation of the Cartagena Protocol on Biosafety

New Output 2.3 - Integration and mainstreaming of Biosafety in NBSAPs in line with the planned post 2020 Biosafety Implementation Framework and related capacity building action plan

Component 4 was reorganised to Component 3 as “Project Monitoring and Evaluation”

Based on experience on M&E of multi-country projects, the three countries especially DRC and Madagascar would require close and dedicated support on project monitoring, use of tools and capture of data to support reporting and implementation of national and inter country and cross team activities. Some resources will also be used to capture lessons learnt, best practices and simulated case studies which can be useful for similar projects in future. The rest of the resources will be focused on Mid Term and Terminal Evaluations.

See Pages 2 and 3

## **Co-financing**

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

**Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

The structure of the project needs to fully redesign to evaluate whether the funding is sufficient to deliver tangible and measurable results in the implementation of the CPB. Please confirm that co-financing in Grants are Recurrent Expenditures and not Investment Mobilize.

9/17/2020

Cleared.

## Agency Response

UNEP:15/04/2020

The project results framework has been redesigned as in Pages 2 and 3 and highlighted in Table B.

Co-financing are recurrent expenditures and not Investment Mobilised – See Table C (See Pages 3 – 4)

## GEF Resource Availability

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

### Secretariat Comment at PIF/Work Program Inclusion

4-7-20

Table D. Agency Fees according to GEF Policies.

Agency	Trust Fund	Country	Focal Area	Programming of Funds	Amount(\$)	Fee(\$)	Total(\$)
UNEP	GET	Namibia	Biodiversity	BD STAR Allocation	1,100,000	104,500	1,204,500
UNEP	GET	Madagascar	Biodiversity	BD STAR Allocation	798,390	75,847	874,237
UNEP	GET	Congo DR	Biodiversity	BD STAR Allocation	960,000	91,200	1,051,200
Total GEF Resources(\$)					2,858,390	271,547	3,129,937

Cleared

## Agency Response

The STAR allocation?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The LDCF under the principle of equitable access

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Impact Program Incentive?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Project Preparation Grant

5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)

Secretariat Comment at PIF/Work Program Inclusion



4-7-20

PPG. Under the cap for projects up to \$3 million

PPG Amount (\$)      PPG Agency Fee (\$)  
93,490                      8,881.55

Agency	Trust Fund	Country	Focal Area	Programming of Funds	Amount(\$)	Fee(\$)	Total(\$)
UNEP	GET	Namibia	Biodiversity	BD STAR Allocation	30,000	2,850	32,850
UNEP	GET	Madagascar	Biodiversity	BD STAR Allocation	23,490	2,231.55	246,645
UNEP	GET	Congo DR	Biodiversity	BD STAR Allocation	40,000	3,800	43,800
Total Project Costs(\$)					93,490	8,882	102,372

Cleared

Agency Response

Core indicators

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

Secretariat Comment at PIF/Work Program Inclusion

4-7-20

No contributions to the Core Indicators as this is a Capacity Building Project.

Cleared

#### Agency Response

#### Project/Program taxonomy

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

#### Secretariat Comment at PIF/Work Program Inclusion

4-7-20

The project is properly tagged with the appropriate keywords.

Cleared

#### Agency Response

#### Part II – Project Justification

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

#### Secretariat Comment at PIF/Work Program Inclusion

4-7-20

The global environmental and/or adaptation problems, root causes and barriers are properly addressed at a high level. Refinements will need to be made after the restructuring of the project as suggested above (Table B).

9/17/2020

Cleared.

### **Agency Response**

**UNEP:15/04/2020**

Refinements made after the restructuring of the project Results Framework in Table B. The changes are highlighted in yellow as reflected in Pages 7 and 8.

## **2. Is the baseline scenario or any associated baseline projects appropriately described?**

### **Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

There is basically "background" information rather the description and quantification of the Baseline Project, that is, the projects that will take place whether the GEF project gets approved. Without a baseline project, it is not possible to build the incremental reasoning to deliver GEBs. Since this is a Capacity Building project, please refine this part concentrating in the issues that relate to the set of activities to be carried out as the result of the restructuring of the project (Table B).

9/17/2020

Cleared.

### **Agency Response**

**UNEP:15/04/2020**

The baseline scenario has been updated guided by Table B and the limited national work program activities to get the Biosafety laws in DRC and Madagascar passed into Biosafety laws and efforts by the National Biosafety Council of Namibia per its mandate to strengthen the national biosafety system through capacity building interventions including the planned project. The changes are highlighted in yellow on Pages 9 - 11

**3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?**

**Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

For the alternative scenario, follow the same recommendation as for the Baseline Projects.

9/17/2020

Cleared.

**Agency Response**

**UNEP:15/04/2020**

Done as guided. The project results framework has been updated as in Table B to focus mainly on the specific interventions of the three participating countries. The changes are highlighted in yellow/ See Pages 11 - 17

**4. Is the project/program aligned with focal area and/or Impact Program strategies?**

**Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

Already discussed above.

9/17/2020

Cleared.

**Agency Response**

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

**Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

Already discussed above.

9/17/2020

Cleared.

**Agency Response**

**UNEP:15/04/2020**

Reviewed and updated as highlighted in Page 18

**6. Are the project's/program's indicative targeted contributions to global environmental benefits (measured through core indicators) reasonable and achievable? Or for adaptation benefits?**

**Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

Already discussed above.

9/17/2020

Cleared.

**Agency Response**

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

### **Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

The Innovation, sustainability and potential for scaling up part appears to be missing. Make it as specific as possible after restructuring the project.

9/17/2020

Cleared.

### **Agency Response**

UNEP:15/04/2020

The innovation, sustainability and scaling up of the project section of the project is updated with specific information and highlighted in yellow on Pages 18 - 19

## **Project/Program Map and Coordinates**

## **Is there a preliminary geo-reference to the project's/program's intended location?**

### **Secretariat Comment at PIF/Work Program Inclusion**

9/17/2020

Cleared.

### **Agency Response**

## Stakeholders

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

### Secretariat Comment at PIF/Work Program Inclusion

10/20/2020

Please provide a description of the stakeholder consultations that took place with civil society organizations and private sector entities, as indicated in the Stakeholders section (#2). Please note that the GEF Policy on Stakeholder Engagement (Nov 2017) requires that that at PIF stage 'Agencies provide a description of any consultations conducted during project development...'

10/23/2020

Cleared.

### Agency Response

22-10-2020

Thanks for the feedback, we provided a brief explanation about the consultations with the CSOs and the private sector. As explained, the consultations with the private sector is limited at this stage, however further consultations are planned at the PPG phase.

## Gender Equality and Women's Empowerment

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

#### **Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

Gender.

Cleared

#### **Agency Response**

### **Private Sector Engagement**

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

#### **Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

It is not clear if the Private Sector is relevant in this project. Please remove if that statement is correct or elaborate further on the roles and responsibilities in the project.

9/17/2020

Cleared.

#### **Agency Response**

**UNEP:15/04/2020**

The referenced statement has been removed. The role of private sector will be further reviewed during the PPG stage

See Page 21



## Risks to Achieving Project Objectives

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

**Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

Thanks for the UNEP Environmental, Social and Economic Review Note (ESERN)

10/6/2020

Although this project is largely focused on capacity building, policy formulation and the like, can you please see STAP guidance on climate risk screening (link below) and provide at least a basic climate risk screening. At a minimum, please discuss how during the PPG phase the project will consider potential climate change risks on biosafety plans and policies that will be developed during the actual project.

At PIF stage, the climate risks should be identified, listed and described. This can include:

- a.) Outlining the key aspects of the climate change projections/scenarios at the project location (or as close to it with data available), which are relevant for the type of intervention being financed (e.g. changes in temperatures, rainfalls, increased flooding, sea level rise, saltwater acquirer contamination, increased soil erosion, etc).
- b.) Time horizon if feasible/data available (e.g. up to 2050). Please refer to list of examples from STAP guidance.
- c.) Listing key potential hazards for the project that are related to the aspects of the climate scenarios listed above (describe how the climate scenarios identified above are likely to affect the project, during 2020-2050).
- d.) Describing plans for climate change risk assessment and mitigation measures during PPG.

(<https://stapgef.org/sites/default/files/publications/Climate%20Risk%20Screening%20web%20posting.pdf>)

In addition to the climate change risk, please describe how COVID-19 is addressed in the project from a risk management standpoint including associated impacts of COVID-19 and how these risks will be mitigated particularly within the context of delivering GEBs and the project objectives. This should cover the design and implementation stages of the project.

10/16/2020

Adequate response. Cleared.

### **Agency Response**

16-10-2020

Two risks have been added to the risk table, one dealing with the climate change risk and one with the COVID-19 pandemic. The ESERN has been replaced with the Safeguard Risk Identification Form which includes a Climate Change and Disaster Risk section

### **Coordination**

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

### **Secretariat Comment at PIF/Work Program Inclusion**

4-7-20

Please concentrate on the issues of coordination for this project only.

9/17/2020

Cleared.

### **Agency Response**

**UNEP:15/04/2020**

Section on Coordination updated with institutional arrangements mainly focused on project coordination and management of the project.  
See Page 25

### **Consistency with National Priorities**

## **Consistency with National Priorities**

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

Secretariat Comment at PIF/Work Program Inclusion

4-7-20

National Priorities

Cleared

Agency Response

## **Knowledge Management**

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

Secretariat Comment at PIF/Work Program Inclusion

4-7-20

KM

Cleared

Agency Response

## **Environmental and Social Safeguard (ESS)**

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

### **Secretariat Comment at PIF/Work Program Inclusion**

9/17/2020

The ESS can be found in the uploaded documents in the portal, but the overall project risk rating is empty in the portal and the section for the date of the upload on the portal for the ESS is also blank.

Please revise and address.

10/16/2020

Adequate revision. Cleared.

### **Agency Response**

16-10-2020

The ESS has been replaced with the Safeguard Identification Results Framework (SIRF) and uploaded in the portal. The project risk rating has been entered in the portal, as well the date of upload.

## **art III – Country Endorsements**

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

## Secretariat Comment at PIF/Work Program Inclusion

4-7-20

LoE

DRC. Signed by the current OFP

Source of funds	GEF Agency	Focal Area	Amount (in US\$)			
			Project Preparation	Project	Fee	Total
GEFTF	UNEP	Biodiversity	40.000	960.000	95.000	1.095.000
Total GEF Resources			40.000	960.000	95.000	1.095.000

Madagascar: Signed by the current OFP

Source of funds	GEF Agencies	Focal area	Amount in USD			
			Project preparation	Project	Fee	Total
GEFTF	UN Environment	Biodiversity	23,490	798,390	78,079	899,959
Total GEF resources			23,490	798,390	78,079	899,959

Namibia. Signed by the current OFP. There is reference to Regional Contribution (\$275,000). Please request a New LoE without separating the National Activities from the Regional Contribution following the needs to restructure Table B.

Source of Funds	GEF Agency	Focal Area	Amount (in US\$)			
			Project Preparation	Project		Total
				National Activities	Regional Contribution	
GEFTF	UNEP	Biodiversity	30,000	825,000	275,000	1,237,350
Total GEF Resources			30,000	825,000	275,000	1,237,350

## **Agency Response**

UNEP:15/04/2020

Updated GEF OFP letter for Namibia uploaded

### **Termsheet, reflow table and agency capacity in NGI Projects**

Does the project provide sufficient detail in Annex A (indicative termsheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table in Annex B to assess the project capacity of generating reflows? If not, please provide comments. After reading the questionnaire in Annex C, is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

### **Secretariat Comment at PIF/Work Program Inclusion**

## **Agency Response**

### **Agency Response to responses under RECOMMENDATION dated 4-29-20**

12-08-20

After conference call and follow up discussions, UNEP have addressed the comment as per the discussion.

## **EFSEC DECISION**

### **RECOMMENDATION**

Is the PIF/PFD recommended for technical clearance? Is the PPG (if requested) being recommended for clearance?

## Secretariat Comment at PIF/Work Program Inclusion

4-7-20

No. Please address the issues listed above. The GEF kindly request to restructure the project around the pending issues of implementation of the CPB in the participating countries.

4-29-20

Following a conference call with the GEFSEC, the GEF Agency will restructure the project around a short list of common elements to the participating countries.

9/17/2020

All previous issues discussed with the previous program manager, Jaime Cavelier, have been adequately addressed however, please address the issues on project risk rating and the uploading of the ESS as noted above. The PIF references the inclusion of a Theory of Change in Annex 1, but this is not in the uploaded documents in the portal and it is not embedded in the submission. Please revise accordingly and resubmit.

10/6/2020

No. Please address comments related to COVID-19 risks and climate change risk and resubmit.

10/20/2020

No. Please note the final comment above regarding stakeholders which is also repeated here:

Please provide a description of the stakeholder consultations that took place with civil society organizations and private sector entities, as indicated in the Stakeholders section (#2). Please note that the GEF Policy on Stakeholder Engagement (Nov 2017) requires that that at PIF stage 'Agencies provide a description of any consultations conducted during project development...'

10/23/2020

Yes. PIF is recommended for technical clearance.

## ADDITIONAL COMMENTS

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

**Secretariat Comment at PIF/Work Program Inclusion**

**Review Dates**

	PIF Review	Agency Response
First Review	4/7/2020	4/15/2020
Additional Review (as necessary)	4/29/2020	8/14/2020
Additional Review (as necessary)	9/17/2020	10/5/2020
Additional Review (as necessary)	10/6/2020	10/16/2020
Additional Review (as necessary)	10/23/2020	10/22/2020

**PIF Recommendation to CEO**

**Brief reasoning for recommendations to CEO for PIF Approval**

The objective of the project is to strengthen institutional, human and regulatory capacities and promote cooperative measures in the implementation of National Biosafety Frameworks in Madagascar, Namibia and DRC. The project is focused on managing possible modern biotechnology threats to the sustainable use and conservation of biodiversity in participating countries.

The high fragility of the region's ecosystem is compounded by threats to biodiversity from intensification of production systems, increased climatic variability and increasing population densities. Contributing to this vulnerability are commercial agricultural practices, and frequent encroachment into forest areas.

Whilst some of the participating countries have developed NBFs to address the threat of biodiversity loss, these need to be fully operationalized with additional institutional capacity for the different streams of Biosafety interventions. NBF implementation is hampered



by: (i) Inadequate human and institutional capacity and resources of national systems to assist in developing and/or implementing of the biosafety regulatory regimes, (ii) Lack of fully functional technical, administrative and institutional frameworks supported by law; (iii) Lack of awareness across the relevant biosafety institutions and all the levels of decision makers and users of the technology; (iv) Limited sharing of best practices, leading to disjointed efforts which in many cases lack sufficient technical guidance; (v) Limited collaboration in the development of tools and guidance for the decision making processes; and (vi) limited engagement across countries in the region to catalyze the development and implementation of biosafety regulatory frameworks.

The project will provide resources to realize effective review/ updating and/or translation of the draft biosafety laws and associated implementation frameworks to a functional and operational national biosafety regime with supportive handling, decision making and follow up measures. The project will also provide the technical and financial resources for institutional capacity building for relevant and designated stakeholders with clearly defined roles and responsibilities under the national biosafety systems.

The project is designed to build on and complement existing or ongoing interventions including the BCH, the existing NBFs, the draft Biosafety Bills, interventions by the African Biosafety Network of Expertise (ABNE) on handling of deliberate releases of LMOs and the ongoing Multi Country LMO Capacity Building Project on LMO testing, ensuring a cost-effective approach and a coherent intervention strategy to maximize the possibilities of achieving the identified outcomes. By building on the baseline with GEF support for the countries, the project will translate the current baseline into updated functional and operational biosafety frameworks to support handling and decision making on LMOs in line with obligations of the Cartagena Protocol.