

## STAP guidelines for screening GEF projects

Part I: Project Information	Response
<b>GEF ID</b>	10584
<b>Project Title</b>	Strengthening the Implementation of National Biosafety Frameworks in Southern Africa (SINBF)
<b>Date of Screening</b>	November 13 2020
<b>STAP member screener</b>	Rosie Cooney
<b>STAP secretariat screener</b>	Virginia Gorsevski
<b>STAP Overall Assessment and Rating</b>	<p><b>Minor</b></p> <p>STAP welcomes this proposal from three southern African countries to establish robust National Biosafety Frameworks, to respond to the prospect of increased trade in Living Modified Organisms (LMOs) in the region.</p> <p>While this is an important priority with clear significance to biodiversity, the pathway through which this policy work will lead to eventual benefits for biodiversity conservation/sustainable use is not articulated.</p> <p>STAP recognizes that it is challenging to give specific indicators for global environmental benefits (GEBs); however, the project should clarify how this work will (over longer timeframes) contribute to reducing threats to biodiversity. The problem statement is rather weak, providing no detail on the state of LMO trade/demand in these countries and no detail on the potential of LMO trade to either benefit or raise threats to biodiversity.</p> <p>In general, the PIF leaves details on many aspects to the PPG stage. The Theory of Change is a good start but needs considerable development to go beyond being a logframe to being a useful and robust TOC. Such a TOC would enable the logical links among the project interventions, and between the interventions and achieving GEBs, to be clearly drawn, and assumptions more comprehensively identified.</p>

	Finally, climate change is likely to considerably alter the risks of LMOs in any particular context, raising the need for its explicit consideration in risk assessment/ management procedures.	
<b>Part I: Project Information</b> <b>B. Indicative Project Description Summary</b>	<b>What STAP looks for</b>	<b>Response</b>
Project Objective	Is the objective clearly defined, and consistently related to the problem diagnosis?	The project objective is "To strengthen institutional, human and regulatory capacities and promote cooperative measures in the implementation of National Biosafety Frameworks in the Participating Southern African countries." It responds to the emergent use of Living Modified Organisms in the region (in South Africa and Eswatini) in the absence of any multilateral agreement to regulate movement of these, and inadequate national frameworks in many countries, with obvious risks for biodiversity. However, the potential problems for biodiversity conservation/SU stemming from movement of LMOs is not spelt out in any detail, and not in any way specific to these countries or this region. It is also not clear that the project is specifically aimed at addressing biodiversity risks rather than e.g. facilitating movement and use of LMOs - in various places it reads rather as the latter. Further, the geographic scope of the project is odd or at least not explained, particularly as the transboundary nature of ecosystems is offered as a reason for the need for cooperation: Madagascar, Namibia and DRC - why these, and why not South Africa and Eswatini? Is there particular trade (current or envisaged) among these countries that has led to their selection? This is particularly relevant given a number of the activities relate to harmonisation across the participant countries - why harmonisation across these three in particular?

		Further explanation on these points would be very helpful.
Project components	A brief description of the planned activities. Do these support the project's objectives?	Generally yes, but see weaknesses below under Theory of Change.
Outcomes	A description of the expected short-term and medium-term effects of an intervention.  Do the planned outcomes encompass important adaptation benefits?	Short term effects and medium term effects are reasonably clear, but not how these link to long term biodiversity conservation.  This is very unclear, as GEBs are not articulated.
	Are the global environmental benefits/adaptation benefits likely to be generated?	See above.
Outputs	A description of the products and services which are expected to result from the project. Is the sum of the outputs likely to contribute to the outcomes?	The outputs are not well specified at this point, though will be clarified in further planning. The range of potential activities/outputs which are included are generally appropriate for achieving the outcomes.
<b>Part II: Project justification</b>	A simple narrative explaining the project's logic, i.e. a theory of change.	
<b>1. Project description.</b> <b>Briefly describe:</b> 1) the global environmental and/or adaptation problems, root causes and barriers that need to be addressed (systems description)	Is the problem statement well-defined?	No, not really. While it is clear that there are inadequate mechanisms in place in these countries to regulate movement of LMOs, the biodiversity "problem" linked to this is not articulated with any specificity or detail, and it is therefore hard to assess whether the planned interventions will fully address it. Presumably for these countries there may be potential biodiversity benefits of (some forms of) biotechnology, but also specific dangers for biodiversity from its introduction and use. Text saying "This limited inertia has led to unscientific barriers to movements of LMOs" appears to assume barriers based on lack of knowledge are unscientific, rather than a perfectly rational response to highly uncertain risk (consistent with the precautionary principle embedded in the Biosafety Protocol). On p13/14 the description of the stages different countries are at is confusing - only three of these countries are participants, it

		seems, so it is not clear why the rest are listed as participants here?
	Are the barriers and threats well described, and substantiated by data and references?	The text conflates barriers and root causes, giving the same list for each. These are in any case really aspects of the problem, rather than being either root causes (deeper, more fundamental drivers leading to the proximate problem) or barriers (what stands in the way of change?)
	For multiple focal area projects: does the problem statement and analysis identify the drivers of environmental degradation which need to be addressed through multiple focal areas; and is the objective well-defined, and can it only be supported by integrating two, or more focal areas objectives or programs?	N/A
2) the baseline scenario or any associated baseline projects	Is the baseline identified clearly?	No, not really. The baseline scenario set out summarises the policy/institutional/capacity context of each country in relation to biosafety, albeit not entirely clearly, but does not set out a baseline in terms of relevant factors such as the level of interest in/use of LMOs, project increase in trade/use, potential biodiversity benefits of or risks posed by LMOs, etc.
	Does it provide a feasible basis for quantifying the project's benefits?	No, see above.
	Is the baseline sufficiently robust to support the incremental (additional cost) reasoning for the project?	The incremental cost reasoning explains why this investment is necessary in order to improve the national biosafety frameworks of the countries, but not how this links to the project's biodiversity benefits.
	For multiple focal area projects:	
	are the multiple baseline analyses presented (supported by data and references), and the multiple benefits specified, including the proposed indicators;	N/A
	are the lessons learned from similar or related past GEF and non-GEF interventions described; and	No - a number of very closely related projects are listed, but no clear lessons drawn from these are articulated. Since it seems that a number of these aimed at achieving what this project is achieving (e.g. two prior projects aimed at establishing a biosafety framework for Madagascar), it seems vital to understand why this has not been adequately achieved to date. What were the

		problems and challenges, and how will this project overcome them?
	how did these lessons inform the design of this project?	See above.
3) the proposed alternative scenario with a brief description of expected outcomes and components of the project	What is the theory of change?	<p>A graphic TOC was provided in a separate document. However, it is really just a reorganised logframe. There are many cross-linkages and dependencies between the pathways that are not shown here. For example, the activities on common approaches to RA (pathway 3) will surely feed into the output of "tools etc on RA are strengthened" (pathway 1). And what about all the steps between policies/systems being developed and them actually having impact? For instance, for policies to have impact they need to be implemented consistently, which in turn requires understanding, political will, perhaps monitoring etc. A useful TOC will set out all the key steps towards actually having the real-world impact, allowing project planners to see critical assumptions at each step and monitor whether they are being fulfilled in practice. In the narrative description, there is a clear link between outputs and outcomes, but the relationship of the outcomes to the impact is not at all clear (going back to the unclear problem statement). How exactly do these outcomes promote the envisaged biodiversity benefits? Further, the outputs are quite general, and the descriptions of activities to achieve them are still quite amorphous. While they all appear generally appropriate for achieving the outputs/outcomes there is a great deal of specification required in the next stage of planning, and it is difficult to feel confident at this stage that the activities will be adequate to achieve outputs, and outputs adequate to achieve outcomes. There also seems a great deal of overlap between Outcome 1 and outcome 2b - is the key difference that 2b involves those outputs/activities to be pursued cooperatively</p>

		across countries? If so why is this element not grouped with Outcome 1? Clearer organisation/delineation of the various components to make the logical distinctions them more obvious would be valuable.
	What is the sequence of events (required or expected) that will lead to the desired outcomes?	See above.
	What is the set of linked activities, outputs, and outcomes to address the project's objectives?	See above.
	Are the mechanisms of change plausible, and is there a well-informed identification of the underlying assumptions?	The mechanisms of change are unclear in terms of achieving the project impact (see above). The identification of assumptions (section 5) focuses very much on procedure i.e. that things planned will actually be done - rather than unpacking assumptions inherent in the logic of the project - a clear graphic TOC would assist in identifying these. For example, a key assumption might be that risk assessment procedures and capacity are adequate to identify highly uncertain potential biodiversity risks posed by novel LMOs. Or that the administrative structures and procedures established by the project persist after the end of the project.
	Is there a recognition of what adaptations may be required during project implementation to respond to changing conditions in pursuit of the targeted outcomes?	No, there does not appear to be any consideration of adaptations for changing circumstances.
5) incremental/additional cost reasoning and expected contributions from the baseline, the GEF trust fund, LDCF, SCCF, and co-financing	GEF trust fund: will the proposed incremental activities lead to the delivery of global environmental benefits?	There do not appear to be any global environmental benefits articulated in this proposal.
	LDCF/SCCF: will the proposed incremental activities lead to adaptation which reduces vulnerability, builds adaptive capacity, and increases resilience to climate change?	N/A
6) global environmental benefits (GEF trust fund) and/or adaptation benefits (LDCF/SCCF)	Are the benefits truly global environmental benefits/adaptation benefits, and are they measurable?	See above.

	Is the scale of projected benefits both plausible and compelling in relation to the proposed investment?	See above – none are identified.
	Are the global environmental benefits/adaptation benefits explicitly defined?	No.
	Are indicators, or methodologies, provided to demonstrate how the global environmental benefits/adaptation benefits will be measured and monitored during project implementation?	No.
	What activities will be implemented to increase the project's resilience to climate change?	Climate change is identified within the risks (see below for more information)
7) innovative, sustainability and potential for scaling-up	Is the project innovative, for example, in its design, method of financing, technology, business model, policy, monitoring and evaluation, or learning?	The project is not really particularly innovative (though still important) - it aims to establish a sound regulatory and administrative regime for biosafety and the underlying capacities for robust assessment, regulation and management.
	Is there a clearly-articulated vision of how the innovation will be scaled-up, for example, over time, across geographies, among institutional actors?	There is a reasonably clear vision of how this will be scaled across the various institutional actors involved in effective biosafety regulation.
	Will incremental adaptation be required, or more fundamental transformational change to achieve long term sustainability?	Long term sustainability will require a major step change in the ability of these countries to effectively regulate and manage biosafety, whether that is considered adaptation or transformation. These countries have each already taken a number of steps toward that goal - this project aims to take them further.
<b>1b. Project Map and Coordinates.</b> Please provide geo-referenced information and map where the project interventions will take place.		Yes – map of Africa with participating countries highlighted.
<b>2. Stakeholders.</b> Select the stakeholders that have participated in consultations during the project identification phase: Indigenous people and local communities; Civil society organizations; Private sector entities.	Have all the key relevant stakeholders been identified to cover the complexity of the problem, and project implementation barriers?	This is not clear. IPLCs have a lot at stake in relation to biosafety and a role for them in not identified here. More broadly, the precautionary risk assessment/management processes envisaged in the Protocol are not purely technical exercises - evaluating highly uncertain risks has a very strong values element (what does society value? what risks is it willing to take to these values, in situations where the level/type of risk is

<p>If none of the above, please explain why. In addition, provide indicative information on how stakeholders, including civil society and indigenous peoples, will be engaged in the project preparation, and their respective roles and means of engagement.</p>		<p>uncertain?). There therefore needs to be strong mechanisms for public/community consultation and input to ensure biodiversity values, and all the cultural/livelihood/social values linked to biodiversity, are fully captured in risk assessment/management. While no role for the private sector is foreseen, should they not be educated about biosafety regulatory procedures and requirements?</p>
	<p>What are the stakeholders' roles, and how will their combined roles contribute to robust project design, to achieving global environmental outcomes, and to lessons learned and knowledge?</p>	<p>See above.</p>
<p><b>3. Gender Equality and Women's Empowerment.</b> Please briefly include below any gender dimensions relevant to the project, and any plans to address gender in project design (e.g. gender analysis). Does the project expect to include any gender-responsive measures to address gender gaps or promote gender equality and women empowerment? Yes/no/tbd. If possible, indicate in which results area(s) the project is expected to contribute to gender equality: access to and control over resources; participation and decision-making; and/or economic benefits or services. Will the project's results framework or logical</p>	<p>Have gender differentiated risks and opportunities been identified, and were preliminary response measures described that would address these differences?</p>	<p>Generally this is adequate. Re i. here - it is not just gendered involvement in biotechnology activities, but gendered potential negative impacts of biotechnology (e.g. through impacts on agricultural biodiversity or socio-political organisation of agricultural activity).</p>

framework include gender-sensitive indicators? yes/no /td		
	Do gender considerations hinder full participation of an important stakeholder group (or groups)? If so, how will these obstacles be addressed?	Potentially. See above.
<p><b>5. Risks.</b> Indicate risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved, and, if possible, propose measures that address these risks to be further developed during the project design</p>	<p>Are the identified risks valid and comprehensive? Are the risks specifically for things outside the project's control?  Are there social and environmental risks which could affect the project?  For climate risk, and climate resilience measures:</p> <ul style="list-style-type: none"> <li>• How will the project's objectives or outputs be affected by climate risks over the period 2020 to 2050, and have the impact of these risks been addressed adequately?</li> <li>• Has the sensitivity to climate change, and its impacts, been assessed?</li> <li>• Have resilience practices and measures to address projected climate risks and impacts been considered? How will these be dealt with?</li> <li>• What technical and institutional capacity, and information, will be needed to address climate risks and resilience enhancement measures?</li> </ul>	<p>There are some weaknesses here. Under communication, the mitigation measure identified for "insufficient moderation" does not appear to respond to this risk. In stakeholder relations, lobbying actions are not adequate mitigation measures for political instability. In human resources, recruit more staff is not an adequate response to the potential lack of adequately qualified personnel to participate in the project (what if these don't exist?). The risks identified focus very much on project activities achieving the outcomes - but what about the risks of the outcomes achieving the project impact? What about risks of LMO trade taking place without adherence to official requirements and processes? Or about the procedures instituted failing to adequate guard against biodiversity risks? What about potential socio-economic impacts of LMO trade - could these be increased by an adequate environmental screening procedure boosting trade?</p> <p>Climate risk is addressed here. The project is aimed at reducing other environmental risks of LMO trade, but these need more explication (see above).</p> <p>This is considered under risk in terms of climate change influencing demand for LMOs. But there are other ways climate change could change risks. For instance, what if the risk posed by specific LMOs changes due to changing climatic conditions? It is well recognised that the risk posed by invasive plants, for example, will change under changing climate scenarios - is the same not true</p>

		<p>for LMOs? And how can the regulatory regime successfully take this into account?</p> <p>Climate resilience practices and measures are not explicitly considered, although successful implementation of the project would enable expanded use of appropriate LMOs that are well adapted to changed climatic scenarios.</p>
<b>6. Coordination.</b> Outline the coordination with other relevant GEF-financed and other related initiatives	Are the project proponents tapping into relevant knowledge and learning generated by other projects, including GEF projects?	There is little explicit learning of lessons from previous projects.
	Is there adequate recognition of previous projects and the learning derived from them?	Many previous projects are identified, but not the learning from them.
	Have specific lessons learned from previous projects been cited?	No – see above.
	How have these lessons informed the project’s formulation?	See above.
	Is there an adequate mechanism to feed the lessons learned from earlier projects into this project, and to share lessons learned from it into future projects?	While there is considerable focus on links with other ongoing projects, it is hard to see clear mechanisms for learning lessons from previous projects. While there are many mechanisms for information sharing, mechanisms to learn lessons from the experience in this project and to capture and share them with future projects are not obvious.
<b>8. Knowledge management.</b> Outline the “Knowledge Management Approach” for the project, and how it will contribute to the project’s overall impact, including plans to learn from relevant projects, initiatives and evaluations.	What overall approach will be taken, and what knowledge management indicators and metrics will be used?	There is a lot of focus on knowledge sharing, but the mechanisms remain rather vague. For instance, it is staged that there will be a knowledge management hub and an information hub established, but the specific form and goals of these are very vague. Some specific dissemination channels are identified, which is useful (e.g. ANUBIS and the UNEP annual forum). There is a strong emphasis on utilising existing channels and platforms for information sharing, which is welcome.
	What plans are proposed for sharing, disseminating and scaling-up results, lessons and experience?	See above.

Notes

STAP advisory response	Brief explanation of advisory response and action proposed
<p><b>1. Concur</b></p>	<p>STAP acknowledges that on scientific or technical grounds the concept has merit. The proponent is invited to approach STAP for advice at any time during the development of the project brief prior to submission for CEO endorsement.</p>
	<p>* In cases where the STAP acknowledges the project has merit on scientific and technical grounds, the STAP will recognize this in the screen by stating that <b><i>“STAP is satisfied with the scientific and technical quality of the proposal and encourages the proponent to develop it with same rigor. At any time during the development of the project, the proponent is invited to approach STAP to consult on the design.”</i></b></p>
<p><b>2. Minor issues to be considered during project design</b></p>	<p>STAP has identified specific scientific /technical suggestions or opportunities that should be discussed with the project proponent as early as possible during development of the project brief. The proponent may wish to:</p>
	<p>(i) Open a dialogue with STAP regarding the technical and/or scientific issues raised;</p>
	<p>(ii) Set a review point at an early stage during project development, and possibly agreeing to terms of reference for an independent expert to be appointed to conduct this review.</p>
	<p>The proponent should provide a report of the action agreed and taken, at the time of submission of the full project brief for CEO endorsement.</p>

<p><b>3. Major issues to be considered during project design</b></p>	<p>STAP proposes significant improvements or has concerns on the grounds of specified major scientific/technical methodological issues, barriers, or omissions in the project concept. If STAP provides this advisory response, a full explanation would also be provided. The proponent is strongly encouraged to:</p>
	<p>(i) Open a dialogue with STAP regarding the technical and/or scientific issues raised; (ii) Set a review point at an early stage during project development including an independent expert as required. The proponent should provide a report of the action agreed and taken, at the time of submission of the full project brief for CEO endorsement.</p>