

Improving Transboundary Water Security and Biodiversity through Integrated Water Resources Management and Ecosystem Restoration in the Lake Ohrid Watershed

Review PIF and Make a recommendation

Basic project information

GEF ID

12251

Countries

Regional (North Macedonia, Albania)

Project Name

Improving Transboundary Water Security and Biodiversity through Integrated Water Resources Management and Ecosystem Restoration in the Lake Ohrid Watershed

Agencies

UNDP

Date received by PM

12/19/2025

Review completed by PM

6/12/2026

Program Manager

Taylor Henshaw

Focal Area

Multi Focal Area

Project Type

MSP

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

10th of January 2026 (thenshaw):

Please secure and upload the LOE from Albania to trigger a full technical review.

19th of January 2026 (thenshaw):

***Please review and follow TDPS PIF 11999 as guidance for each section of the PIF.

(a) Partly. The project does not include any co-financing, and, thus, is not a ready for a GEF investment.

(b) Please address the following:

(i) For Project Sector, please leave blank. This is for CCM projects only.

(ii) Taxonomy classifications are incomplete. Please populate.

(iii) Total co-financing ratio is blank. A GEF investment will not move forward without an acceptable co-financing ratio (aspiration is 1:7). Please include indicative co-financing at PIF stage.

(iv) Both LOEs state that Global Water Partnership not "Global Water Partnership-Mediterranean" is the selected executing entity for this project. Please update the Project Information Table to match the LOE.

(v) The Albania LOE is uploaded to the Documents tab but it is not uploaded through the Portal. Only the North Macedonia is uploaded. See screenshot:

Record of Endorsement of GEF Operational Focal Point (s) on Behalf of the Government(s):

Name	Position	Ministry	Date
Betim Lamallari	GEF Operational Focal Point	Ministry of Environment and Physical Planning, Republic of North Macedonia	12/18/2025

(vi) Please strengthen country ownership (through national level executing partners), particularly for the execution of LDFA-related activities under Components 2 and 3. At present, the selected executing entity does not appear to have strong expertise in delivering on-the-ground land management interventions.

30th of April 2026 (thenshaw):

(a) See co-financing comments below.

(b)

(i) Not addressed

(ii) Addressed

(iii) See co-financing comments below.

(iv) Not addressed. Field still states "Global Water Partnership - Mediterranean"

Is GWP a CSO, as classified? "Others" seems more appropriate.

(v) Addressed

(vi) Please indicate in addition to GWP, "national executing entities to be determined in PPG". Engaging institutions in each country as responsible partners is a requirement for this investment to proceed. The Agency response will be closely examined at CEO Endorsement.

*For country field, include "North Macedonia, Albania", not "Regional".

** Please adjust the project title to "Improving Transboundary Water Security and Biodiversity through Integrated Water Resources Management and Ecosystem Restoration in the Lake Ohrid Watershed". Please obtain emails from each OFP confirming this title change.

7th of June 2026 (thenshaw): Partly Addressed.

(vi) Not addressed. Please include in the executing entities field (on an additional line in the below field), "National executing entities, TBD".

Executing Partner:	Global Water Partnership	Executing Partner Type:	Others
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10th of June 2026 (thenshaw): Addressed

Agency's Comments

UNDP Response, 10 June 2026:

Line added in the portal

Section	Secretariat's Comments -April 30	Agency comments
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?	(a) Partly. The project does not include any co-financing, and, thus, is not ready for a GEF investment. New: (a) See co-financing comments below. (b -i) For Project Sector, please leave blank. This is for CCM projects only. New: (i) Not addressed	Thank you, your comments have been noted. Thank you, it has been addressed

	(b -iii) Total co-financing ratio is blank. A GEF investment will not move forward without an acceptable co-financing ratio (aspiration is 1:7). Please include indicative co-financing at PIF stage. New: (iii) See co-financing comments below.	Thank you, your comments have been addressed. The co-financing related comments have been updated to USD 30,755,784 M.
	(b - iv) Both LOEs state that Global Water Partnership not "Global Water Partnership-Mediterranean" is the selected executing entity for this project. Please update the Project Information Table to match the LOE. New: (iv)Not addressed. Field still states "Global Water Partnership - Mediterranean" Is GWP a CSO, as classified? "Others" seems more appropriate.	Thank you, it has been addressed.
	New: (b - vi) Please indicate in addition to GWP, "national executing entities to be determined in PPG". Engaging institutions in each country as responsible partners is a requirement for this investment to proceed. The Agency response will be closely examined at CEO Endorsement. *For country field, include "North Macedonia, Albania", not "Regional". ** Please adjust the project title to "Improving Transboundary Water Security and Biodiversity through Integrated Water Resources Management and Ecosystem Restoration in the Lake Ohrid Watershed". Please obtain emails from each OFP confirming this title change.	Thank you. Additionally, to GWP, national executing entities to be determined in PPG. The ?Responsible partner? modalities are being clarified. Done as advised. The emails from the OFPs are attached to the resubmission package.

UNDP Response, 19 Jan 2026: We uploaded the LOE from Albania. Thank you.

Secretariat's Comments	Agency comments
(a) Partly. The project does not include any co-financing, and, thus, is not a ready for a GEF investment.	Included
(b -i) For Project Sector, please leave blank. This is for CCM projects only.	Done
(b -i i) Taxonomy classifications are incomplete. Please populate	This is addressed, please see Taxonomy worksheet
(b -iii) Total co-financing ratio is blank. A GEF investment will not move forward without an acceptable co-financing ratio (aspiration is 1:7). Please include indicative co-financing at PIF stage.	This is addressed, see tables in ?Indicative Co-financing? in ?Indicative Project Overview? (General Project Overview)
(b - iv) Both LOEs state that Global Water Partnership not "Global Water Partnership-Mediterranean" is the selected executing entity for this project. Please update the Project Information Table to match the LOE.	This is addressed

(b - v) The Albania LOE is uploaded to the Documents tab but it is not uploaded through the Portal. Only the North Macedonia is uploaded. See screenshot.

This is addressed

(b - vi) Please strengthen country ownership (through national level executing partners), particularly for the execution of LDFA-related activities under Components 2 and 3. At present, the selected executing entity does not appear to have strong expertise in delivering on-the-ground land management interventions.	GWP has strong experience in designing and implementing projects in ecosystems and socio-economy, including measures in agriculture; it currently implements related activities in financed projects in Africa. The project strongly promotes country ownership and - Engagement of implementation of activities by National (modality) (also see Section ?Indicative Implementation / 5. Project Components, Outcomes and Outputs). To ensure national ownership, the project will actively engage organizations to execute specific activities under Output 2.1.1, meaning they will be directly contracted by the Executive Arrangements? at the end of section: B. Project Description (Outputs). These institutions will be engaged in activities: •Performing surveillance and investigative monitoring •Developing the hydrological and hydraulic model •Developing the transboundary level operational management •Conducting the joint fish stock assessment study •Harmonizing country-level management and planning (2.1.2). •Designing and implementing nature-based solutions Furthermore, the project will systematically leverage existing bodies, such as the Ohrid Hydrobiological Institute, for decision-making and capacity building (section: B. Project Description Outputs/ Component 2, Output 2.1.1; Component 4, Output 4.1.2). - Utilizing Existing Governance and Steering Committee To guarantee that the participating countries have ownership, the project utilizes the existing transboundary body to steer the project. It will be comprised of officially nominated representatives from Albania and North Macedonia, representatives from the Ohrid and Pogradec municipalities (Executive Arrangements). - Inclusive Stakeholder Engagement The project relies heavily on the local appropriation of the project. The Engagement Strategy and Gender Action Plan will ensure inclusive participation in decision-making (see under Executive Arrangements). Stakeholders include: •Government and Local Authorities: Ministries and local authorities will develop and adopt the plans (Section: 7. Stakeholder Engagement and Capacity Building) •The Private Sector and Local Communities: Small businesses, fishermen, and tourism operators, will be engaged in the project. Implementing precision agriculture through a targeted approach (Section: 3.1.2; Section: 4. Stakeholder Engagement and Capacity Building) •Civil Society: NGOs, women's organizations, and youth groups will raise awareness and advocacy (see section: 7. Stakeholder Engagement and Capacity Building) Finally, to ensure these stakeholders and institutions are effectively engaged, the project includes targeted capacity-building and learning programs for local authorities, such as the Ohrid Hydrobiological Institute (Component 4, Output 4.1.2).
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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

19th of January 2026 (thenshaw): No.

(1) No. Please improve/recast the summary narrative, following TDPS GEF ID 11999 (UNDP Implementing Agency) as a template.

30th of April 2026 (thenshaw):

Addressed. However, please remove Gender Action Plan and Stakeholder Engagement Plan references under Component 4. These are crosscutting elements that are not project activities, rather they are utilized to support project activities.

Given the larger Drin project, an aspect of moving forward with this project is to serve as demonstrator for future GEF investments in transboundary lakes. Please explain in the summary how this lake project can be used to benefit future transboundary lake projects in GEF-9 and beyond.

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30: Gender Action Plan and Stakeholder Engagement Plan references are removed under Component 4. The summary -and other parts of the PIF such as the theory of change- is updated to reflect the changes in Component 4, Component 5 and the CIs. Additionally, text is included in the summary to explain how this lake project can be used to benefit future transboundary lake projects in GEF-9 and beyond:

?The Lake Ohrid project can serve as a demonstrator for future GEF investments in transboundary lakes, particularly looking toward GEF-9 and beyond. By successfully bridging the gap between macro-level regional governance frameworks (the Drin Basin) and localized, ecosystem-specific management (Lake Ohrid), the project provides a replicable blueprint for scaling localized nature-based solutions within larger transboundary systems. The project directly links ecosystem preservation to the socio-economic livelihoods of local communities. The harmonization of disparate national protected area regimes, along with the integration of sectoral plans under a transboundary Master Plan and their embedding into local, legally binding spatial plans, forms an approach for science-informed integrated basin management that can be replicated in other lake basin systems. Through systematic knowledge capture and the GEF IW:LEARN network, these validated frameworks will be widely disseminated to benefit future transboundary lake projects globally, offering a tested pathway for achieving sustained ecosystem restoration and policy alignment in complex transboundary landscapes.?

Jan 19: This is addressed as per advise. Summary doesn't now follow the ?250 words? rule; a new summary is introduced to the PIF following example provided by the GEF SEC as reference. See Project Summary section.

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
9th of January 2026 (thenshaw):

(a) Yes

(b) No.

*Please note which outputs are tied to the North Macedonia STAR allocation.

Please address the following. In general, please use the TDPS PIF output and outcome phrasing as a template. **The project overview table for this Lake Ohrid project does not meet the standard for a GEF project.**

Component 1

Please tease out Output 1.1 into standalone outputs.

Please ensure each output is properly phrased as an output and includes action words like developed, operationalized etc. See TDPS PIF for guidance.

There is no co-financing secured and allocated to this Component.

Component 2

Please ensure each output is properly phrased as an output and includes action words like developed, operationalized etc. See TDPS PIF for guidance.

There is no co-financing secured and allocated to this Component.

Component 3

The Component 3 outputs largely read as outcomes. Please recast to specific outputs.

The Component 3 outcome needs to be made more specific, not just to "the achievement of environmental objectives".

There should be significant co-financing secured and allocated to this Component.

Please include at least one gender mainstreaming (women empowerment) output under this Component.

Component 4

"1. Communication and awareness raising and participation actions to enable stakeholder engagement" is not a sufficiently developed output. Please revise.

"2. Actions to enable coordination with on-going initiatives and projects" is not a sufficiently developed output. Please revise.

"3. Training to strengthen the capacity of the (i) Ohrid Hydro-Biological institute on reporting obligations under the EU directives (ii) Municipalities on sustainable tourism (iii) Port authorities" is not a sufficiently developed output. Please revise.

"4. Actions to mainstream Gender in project execution" is not a sufficiently developed output. Please revise.

"5. Knowledge management approach is developed and implemented, and participation in GEF IW LEARN activities" is not a sufficiently developed output. Please revise.

There is no co-financing secured and allocated to this Component.

M&E: See below section.

There is no co-financing secured and allocated to M&E.

30th of April 2026 (thenshaw):

Please remove indicators from the Output column. Include instead in the project description.

(b)

*The North Macedonia footnote indicated in the review matrix does not appear below the project overview table in the Portal. Please include.

Please update the project architecture in according with the comments in the detailed project section below.

7th of June 2026 (thenshaw): Partly addressed.

The North Macedonia "*" footnote in Output3.1.3 still does not appear below the project overview table in the Portal. Please include "*" in "Please Provide Justification" section.

The Output numbering for M&E is incorrect. Please label as "Output 5.1.1" and "Output 5.1.2"

Please fix 2.1.1 formatting.

10th of June 2026 (thenshaw): Addressed

Agency's Comments

UNDP Response, 10 June 2026:

Done

Output numbering for M&E is fixed in multiple points in the PIF. 2.1.1 formatting is fixed in PIF.

April 30:

3.1. Indicative Project Overview b) Are the components, outcomes and outputs sound, appropriate and	New: Please remove indicators from the Output column. Include instead in the project description.	Done as per advice. Indicators description.
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sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?	New: (b) *The North Macedonia footnote indicated in the review matrix does not appear below the project overview table in the Portal. Please include. Please update the project architecture in according with the comments in the detailed project section below.	Thank you, your comments ha
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Jan 19:

(b) No. Please note which outputs are tied to the North Macedonia STAR allocation	This is addressed. The following Outputs will be STAR allocation to this project: Output 3.1.3. <i>Nature-based solutions designed and implemented in the Ohrid lake basin in North Macedonia</i> ; Output 3.1.4. <i>A feasibility study and engineering rehabilitation of port and waterway infrastructure to reduce the pressure to the littoral ecosystems</i> . A footnote for these two Outputs is included under the heading <i>*Outputs 3.1.3. and 3.1.4. will be implemented using the North Macedonia STAR funds allocated for the project</i> .
(b) Please address the following. In general, please use the TDPS PIF output and outcome phrasing as a template. The project overview table for this Lake Ohrid project does not meet the standard for a GEF project.	Done as advised - see information on changes made to the project overview table and to strengthen outcome level formulation we will be further elaborated during PPG.
Component 1 Please tease out Output 1.1 into standalone outputs. Please ensure each output is properly phrased as an output and includes action words like developed, operationalized etc. See TDPS PIF for guidance.	Output 1.1 is broken down in three outputs each with related activities/deliverables. The boating legislation is in a new version; apart from project design related requirements, changes are made as per advice ? see below, table 1.1.1. Project Description/5. Project Components, Outputs and Indicators. ? Old Outputs (Dec 2025 PIF): o Output 1: Priority measures under the Lake Ohrid Management Framework Directive (WFD) including: (i) surveillance and monitoring, (ii) updating and increasing precision of the data, (iii) considerations, (iii) establishment of reference conditions for Lake Ohrid water bodies, (iv) a transboundary assessment of chemical, biological and fisheries) aligned with the WFD Committee. o Output 2: A joint fish stock assessment study. o Output 3: Analysis of legislation, and legal texts related to the pertinent EU Directives and standards. ? New Outputs (March 2026 PIF): o Output 1.1.1: Surveillance and investigative monitoring to assess the ecological status of Lake Ohrid water bodies in accordance to the WFD. o Output 1.1.2: A hydrological and a hydraulic assessment and updated water balance incorporating climate change impacts on sectors depended on water availability. o Output 1.1.3: A transboundary level operational framework developed to support informed decision-making among the countries. o Output 1.1.4: A joint fish stock assessment study and fisheries management instruments.

Component 1. There is no co-financing secured and allocated to this Component.	This is addressed. See table in section Indicative Annex A.
Component 2 Please ensure each output is properly phrased as an output and includes action words like developed, operationalized etc. See TDPS PIF for guidance.	Changes are made as per advice - see below, in table 5. Project Components, Outputs and Indicators. Outputs were consolidated from 6 down to 5. <i>Output 1 plan</i> is now integrated in the Output related to the management of the Basin; apart from project design related results, it simplifies the project structure and its management. ? Old Outputs (Dec 2025 PIF): - o Output 1: A joint Fishery Management Plan, to enable harmonized or coordinated fishery regulation. - o Output 2: Harmonization of management plans for nationally established protected areas in the Lake Ohrid Watershed. - o Output 3: A transboundary level tourism development plan. - o Output 4: An updated Lake Ohrid Management Plan. - o Output 5: A master plan for Lake Ohrid integrating land use, protected area management plans, fisheries management plans, presented for adoption to the Lake Ohrid Committee. - o Output 6: Protocols to the Lake Ohrid Agreement for exchange, (ii) fisheries management and (iii) tourism development in the countries. ? New Outputs (March 2026 PIF): - o Output 2.1.1: A joint Fishery Management Plan, presented for adoption to the Lake Ohrid Committee to enable harmonized fishery regulation. - o Output 2.1.2: Country level management and monitoring plans for nationally established protected areas in the Lake Ohrid Watershed, consistent protection and sustainable resource use. - o Output 2.1.3: An updated Lake Ohrid Management Plan, for the management of the watershed in accordance with the Lake Ohrid Agreement. - o Output 2.1.4: A master plan for Lake Ohrid integrating land use, coordinated implementation of existing plans and management plans, presented for adoption to the Lake Ohrid Committee, transboundary level tourism development. (<i>Note: this is a new output, not in the old PIF</i>). - o Output 2.1.5: Protocols to the Lake Ohrid Agreement for exchange, (ii) fisheries management and (iii) tourism development in the countries for signature.
Component 2. There is no co-financing secured and allocated to this Component.	This is addressed. See table in section Indicative Annex A.

Component 3. The Component 3 outputs largely read as outcomes. Please recast to specific outputs. The Component 3 outcome needs to be made more specific, not just to "the achievement of environmental objectives".	Changes are made as per advise ? see below, in the Project Description/5. Project Components, Outcome 3 (Old) <i>The achievement of environmental objectives through implementation of priority actions that enable agricultural functioning and preservation /</i> <i>Outcome 3.1 (New): Nutrient and toxic pollution preservation is enhanced through priority actions and agricultural solutions.</i> ? Old Outputs (Dec 2025 PIF): o Output 1: Wastewater management for nutrient solutions (constructed wetlands). o Output 2: Sustainable agricultural practices for conservation - Piloting and upscaling of precision Basin. o Output 3: Erosion control - in the Sateska basin o Output 4: Sustainable port and waterway infrastructure documents for the reconstruction/ rehabilitation of o Output 5: Sustainable transboundary fisheries monitoring and control capacities. ? New Outputs (March 2026 PIF): o Output 3.1.1: One nature based solution for wetlands constructed in a priority area. o Output 3.1.2: Two precision agriculture demonstration practitioners and promote practices in priority areas for conservation, and water use optimization. o Output 3.1.3: Nature-based solutions designed for the basin in North Macedonia. o Output 3.1.4: A feasibility study and engineering for rehabilitation of port and waterway infrastructure to reduce pressure to the littoral ecosystems. o Output 3.1.5: Equipment is purchased and a transboundary illegal fishing monitoring and control capacities of women practitioners.
Component 3. There should be significant co-financing secured and allocated to this Component.	This is addressed. See table in section Indicative
Component 3. Please include at least one gender mainstreaming (women empowerment) output under this Component.	This is addressed - see under B. Project Description (Outputs?), and also under GEF SEC comments in the project have activities that mainstreams gender empowerment per the advice received: o Output 3.1.2: Two precision agriculture demonstration practitioners and promote practices in priority areas for conservation, and water use optimization. o Output 3.1.5: Equipment is purchased and a transboundary illegal fishing monitoring and control capacities of women practitioners.

Component 4. "1. Communication and awareness raising and participation actions to enable stakeholder engagement" is not a sufficiently developed output. Please revise. "2. Actions to enable coordination with on-going initiatives and projects" is not a sufficiently developed output. Please revise. "3. Training to strengthen the capacity of the (i) Ohrid Hydro-Biological institute on reporting obligations under the EU directives (ii) Municipalities on sustainable tourism (iii) Port authorities" is not a sufficiently developed output. Please revise. "4. Actions to mainstream Gender in project execution" is not a sufficiently developed output. Please revise. "5. Knowledge management approach is developed and implemented, and participation in GEF IW LEARN activities" is not a sufficiently developed output. Please revise.	Changes are made as per advice - see below, in the Project Description / 5. Project Components, Outputs from 5 down to 3; apart from project design related, simplifies the project structure and its management. ? Old Outputs (Dec 2025 PIF): - o Output 1: Communication and awareness raising and engagement. - o Output 2: Actions to enable coordination with on-going initiatives and projects. - o Output 3: Training to strengthen the capacity of the (i) Ohrid Hydro-Biological institute on reporting obligations under the EU directives (ii) Municipalities on sustainable tourism (iii) Port authorities. - o Output 4: Actions to mainstream Gender in project execution. - o Output 5: Knowledge management approach is developed and implemented, and participation in GEF IW LEARN activities. ? New Outputs (March 2026 PIF): - o Output 4.1.1: Gender mainstreaming and gender strategic communication activities, developed and implemented, and sustainability. - o Output 4.1.2: Targeted capacity development of authorities to support application of project development. - o Output 4.1.3: Knowledge products developed and implemented, including participation in IW Co-LEARN Notes.
Component 4. There is no co-financing secured and allocated to this Component.	This is addressed. See table in section Indicative

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

Secretariat's Comments

19th of January 2026 (thenshaw):

Gender: No. "Actions to mainstream Gender in project execution" is not sufficient for gender actions in a GEF project. Gender mainstreaming, including women empowerment must be embedded across all project components, with dedicated outputs. See TDPS project for guidance.

Under Output 1.1, please consider how relevant gender equality aspects may be included in knowledge products and tools to be developed.

KM: No. The outputs are not sufficiently developed. See comments in above section.

M&E: No. There are no outputs associated with M&E. The M&E outcome is not phrased as an outcome. Please see TDPS for guidance. Further, \$56,000 dedicated to M&E activities is not sufficient.

30th of April 2026 (thenshaw):

Gender: Addressed

KM: Please see comments below on KM

M&E: Please see comments below on M&E.

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30: Thank you. Comments below are noted and addressed as per advice.

Jan 19:

"Actions to mainstream Gender in project execution" is not sufficient for gender actions in a GEF project. Gender mainstreaming, including women empowerment must be embedded across all project components, with dedicated outputs. See TDPS project for guidance. Under Output 1.1, please consider how relevant gender equality aspects may be included in knowledge products and tools to be developed.

This is addressed. See under B. Project Description Outputs. Instead of Output 1.1 two Outputs under empowerment and balance.

The project now embeds gender mainstreaming across the entire design, utilizing a strategy that ranges from the top-down to the-ground economic interventions.

- Strategic Framework and Foundational Planning

Drawing on lessons learned from work under the previous project, the project integrates gender strategies at the earliest stages. During the Preparation Grant (PPG) phase, a dedicated Gender Strategy is developed alongside a gender-responsive stakeholder analysis. The Gender Strategy informs the deliverables under Output 4.1.1. The Plans will be developed during the implementation phase and will include a set of actions to ensure women's participation across all stages of the project. Women's groups to participate in a Gender Community of Practice and engage institutional Gender Focal Points in co-management and governance.

- Data Collection, Policy, and Governance (Component 1)
Gender considerations are integrated into the project design.

●Output 1.1.3 (Transboundary monitoring program) will collect data to support equitable policy responses across the basin.

●Output 2.1.2 (Harmonization of protected areas) will engage technical groups to align zoning and regulations across the basin.

●Output 2.1.4 (Master Plan) requires the development of an inclusive, gender-balanced working groups and community-based organizations.

- On-the-Ground Empowerment and Livelihoods
The project actively connects ecosystem restoration efforts to specific field interventions:

●Output 3.1.2 (Precision agriculture) is designed to support women-led businesses and will prioritize women-led agricultural businesses and building that actively engages women in soil and water conservation institutions to design micro-credit mechanisms that support women's empowerment.

●Output 3.1.5 (Illegal fishing monitoring) features community-based enforcement and protected area managers. It actively engages community enforcement and explicitly ensures that all procurement (e.g., cameras, boats) are accessible and suitable for use by women.

- Capacity Building, Knowledge Management, and Communication
To address these impacts, the project ensures that institutional arrangements are gender-responsive:

●Output 4.1.2 (Capacity building for authorities) will address specific gender-differentiated capacity needs with local municipalities and will aim at including 50% women.

●Knowledge Management: The project will develop a platform for inclusive learning across the basin.

●Output 5.1.1 (Monitoring and Evaluation) establishes a system to track technical and governance outcomes. This includes a gender lens to inform adaptive management, which ties direct

Knowledge Management: The outputs are not sufficiently developed. See comments in above section.	This is addressed. See: (i) table in section Indicatio Description/5. Project Components, Outcomes and Knowledge products developed and disseminated along with lessons learned, including participatio Experience Notes. The description should be read Description/8. Knowledge Generation and Manag
M&E: There are no outputs associated with M&E. The M&E outcome is not phrased as an outcome. Please see TDPS for guidance. Further, \$56,000 dedicated to M&E activities is not sufficient.	This is addressed. See: (i) table in section Indicatio Description/5. Project Components, Outcomes and \$150,000 is now dedicated to M&E activities.

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

19th of January 2026 (thenshaw):

(a) No. There is no co-financing included.

(b) No. There is no co-financing included.

(c) Yes

30th of April 2026 (thenshaw):

(a) Please secure additional co-financing sources during PPG to ensure co-financing contributes to adequately funding the components.

(b) Yes

7th of June 2026 (thenshaw): Addressed

10th of June 2026 (thenshaw): Funds allocated from co-financing to PMC are 4.6%, while from GEF Resources are 5.0% - for a co-financing of \$29,400,000, the co-financing resources to be allocated to PMC must be \$1,470,000 to achieve 5.0% (instead of \$1,355,784). Please amend.

12th of June 2026 (thenshaw): Addressed

Agency's Comments

June 12 2026:

Thank you for your comment, well received! Please kindly note that revision has been made accordingly in the PIF and portal.

April 30:

Thank you. Additional co-financing of USD 1 M from UNDP and USD 1.5 M from the Government of Albania, have been secured during the current PIF review period. Additional co-financing sources will be sought during PPG phase for the funding of the components.

Jan 19:

This is addressed, see tables in ?Indicative Co-financing section?, and allocation of co-financing in ?Indicative Project Overview? sections.

Proportionality principle: The co-financing figure -see Table and Notes under section ?Indicative Co-financing?- deriving from the subtraction of co-financing from projects that contribute to achieving the envisaged results under Outcome 3, is allocated among the 4 components in a way that is proportional to the allocation of the GEF budget. The cofinancing figure for Component 3 comprises both the amount derived from projects supporting the achievement of Outcome 3 and the proportionally allocated share of the GEF budget, as outlined above.

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

19th of January 2026 (thenshaw):

(a) Please support the environmental problems and drivers narrative with scientific evidence/citations throughout section.

Please follow the TDPS PIF as template, with each problem clearly identified and explained and backed with scientific evidence.

The Drin SAP implementation project includes an activity on Ohrid. Please explain the dynamics between that activity and this project. It is the reviewer's understanding that the Ohrid activity under the Drin SAP project will now be repositioned to another geographic area of the extended Drin.

(b) Partly. This needs to be much more fleshed out. See TDPS PIF as template.

30th of April 2026 (thenshaw): Addressed

Agency's Comments

(a) Please support the environmental problems and drivers narrative with scientific evidence/citations throughout section. Please follow the TDPS PIF as template, with each problem clearly identified and explained and backed with scientific evidence.	This is addressed as per advice. See PIF under Project Description/sections 1.1-1.4 and particularly 1.4 <u>need to be addressed</u>. Extensive citations of individual project's baseline is not drawn from dispersed literature reports that have already assembled and synthesized explicitly listed as the foundational references for scientific data provided are the same in multiple single piece of information would need to cite multiple to complicate the narrative without adding new science based on solid scientific research and analysis by experts: - The findings of the "Conservation and Sustainable Management of the Prespa and Shkodra/Skadar (CSBL)" Technical Assistance in particular those related to fisheries management - The report on Water Quality Monitoring in Prespa sub-basins (2017) and the findings of the first GEF/UNDP Drin Project and feeding into the - The Lake Ohrid Watershed Management Plan monitoring programme that was conducted across (2019) covering physico-chemical, hydro-morphological Ohrid and its tributary rivers, implemented in the development of the LOWMP. - The Study for the valorization of the Lake Ohrid 2021 - The Strategic Recovery Plan for the Natural Heritage (2030) prepared by the governments of Albania and - The joint State of Conservation Report, submitted by Albania to the UNESCO World Heritage Centre - The joint World Heritage Centre, ICOMOS Operational Guidelines for the Assessment of Natural and Cultural Heritage of the Ohrid Region (hereafter "Joint Mission Report"). - Information and data provided by Albania? through email exchange.
(b) Partly. This needs to be much more fleshed out. See TDPS PIF as template.	This is addressed as per advice. See table in section Project Outline/A. Project Rationale/1. Baseline and four Barriers thoroughly described there. The way forward under B. Project Description/1.3 Theory of Change

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

19th of January 2026 (thenshaw):

- (a) "Financially, the project is designed to be catalytic". Without co-financing, the project cannot be catalytic. Please secure an acceptable co-financing ratio.

Please explain the reasoning for this project as an additionality to the ongoing Drin SAP implementation.

(b) Yes

(c) See (a) . Please provide a much more robust narrative of the baseline. See TDPS PIF as template.

Further, what are the lessons learned from these past investments that fed into the development of this PIF?

Please provide a detailed box on the the framework of the Drin Coordinated Action for the implementation of the Drin MoU and how this project will be implemented within that framework.

Please include the Annex 3 table in the PIF and describe how the project will build off each of these efforts.

(d) Partly. This needs to be much more fleshed out. See TDPS PIF as template. Please also include the Annex 4 list of stakeholders directly in the PIF. Please display this list as a table, with one column dedicated to describing the roles that each will play in the new project (i.e, indicatively which outputs).

30th of April 2026 (thenshaw): Addressed.

However, please see comment in next section on stakeholders mapped to output delivery.

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30:

Thank you. Comments below are noted and addressed as per advice.

Jan 19:

(a) "Financially, the project is designed to be catalytic". Without co-financing, the project cannot be catalytic. Please secure an acceptable co-financing ratio.	This is addressed as per advice. See table in section FINANCING TABLES /Indicative Co-financing
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(a) Please explain the reasoning for this project as an additionality to the ongoing Drin SAP implementation.

The proposed Lake Ohrid project is designed (i) to support sustainable management of the Lake Ohrid Basin and (ii) to not duplicate but to act as a targeted, sub-basin operation. The project established by the Drin SAP contributing in the implementation of the project provides macro-level basin-wide tools and (ii) the additionality of downscaling, refining, and applying the project to the globally significant ecosystem of Lake Ohrid, which is a key element of the Agreement.

The reasoning for this additionality and synergy is provided in the Rationale / 2. Project Fit within the Current Land Use Framework, projects and the subsection *Implementation of the Project within the Framework*), as well as in B. Project Description and the subsection *Additionality*.

The proposed project takes into consideration the existing Drin SAP Outputs designed to -not only avoid duplication but to complement and the Drin CODA framework. More specifically, the project will:

- Technical and Scientific Downscaling (Component 1): To develop the basin-wide scientific tools developed by the Drin SAP for application:

- Output 1.1.2 (Hydrological and hydraulic modeling): To take the comprehensive Drin basin hydrological modeling and downscale/refine it to ensure (i) scientific robustness and balance (ii) alignment across the Drin Basin.

- Output 1.1.3 (Transboundary monitoring program): To integrate the broader Drin Monitoring Programme that applies the transboundary monitoring data generated by the Drin SAP using the basin-wide Drin Information Management System (DIMS) SAP project.

- Integrated Governance and Policy Alignment (Component 2): Projects are intertwined to ensure sub-basin efforts are aligned across the Basin:

- Output 2.1.3 (Updated Lake Ohrid Management Plan): The LOWMP will be deliberately structured so that it complements the addendum to the broader national Drin (Albania) Management Plan.

- Institutional Coordination: The Lake Ohrid project will establish a Committee. Because nominated representatives of the overarching Drin Core Group (DCG), the project will ensure the basin-wide decision-making of the DCG (which is a formal "Drin Commission").

- On-the-Ground SAP Targets (Component 3)

- Outputs 3.1.1, 3.1.2, and 3.1.3 (Wetlands, precision agriculture, and water quality): The project establishes broad pollution reduction targets for the project and the additionality of targeted, localized investments to contribute to achieving those Drin basin-wide pollution reduction targets.

- Social Inclusion and Gender (Component 4)

- Output 4.1.1 (Gender Action Plan): To ensure a gender-responsive approach will establish groups that will participate directly in the project established by the Drin SAP project. This ensures the project at the sub-basin level while contributing to the basin-wide project. Ultimately, as noted in the PIF's Additionality section, the project will build momentum of the Drin initiatives to fill "critical gaps" in the investment needed for effective transboundary management that has been delayed without sub-basin specific support.

(c) See (a). Please provide a much more robust narrative of the baseline. See TDPS PIF as template.
Further, what are the lessons learned from these past investments that fed into the development of this PIF?
Please provide a detailed box on the the framework of the Drin Coordinated Action for the implementation of the Drin MoU and how this project will be implemented within that framework.
Please include the Annex 3 table in the PIF and describe how the project will build off each of these efforts.

(d) Partly. This needs to be much more fleshed out. See TDPS PIF as template. Please also include the Annex 4 list of stakeholders directly in the PIF. Please display this list as a table, with one column dedicated to describing the roles that each will play in the new project (i.e, indicatively which outputs).

Changes are made as advised - see also response PIF under *Project Rationale / 2. Project Fit within the Current Landscape*.

(i) Alignment with national priorities: The national priorities have been taken into consideration so as the project in the two countries is given in Annex 2.

(ii) Building on previous GEF and non-GEF investments: The project builds on achievements by previous and ongoing projects and in line with those implemented in Albania and North Macedonia. The project is aligned to the objectives and activities of the project in Albania and North Macedonia. The Project will build on/ be benefited from these efforts. (See *Project Fit within the Current Landscape*).

(iii) Regional cooperation: The project will be implemented within the Drin Coordinated Action for the implementation of the Drin MoU, in line with regional efforts for the sustainable management of the Drin. The framework is being used to coordinate actions related to the Drin. The project will be implemented within the Drin Coordinated Action. (See *Project Rationale / 2. Project Fit within the Current Landscape*).

(iv) Lessons were drawn for the design of the project from the Drin Project as these are presented in its Terminology. The project builds on lessons from GEF projects such as the TDPS Phase I, and the Drin Project in Albania and North Macedonia for the management of the Drin. In some detail in this section (*Project Rationale / 2. Project Fit within the Current Landscape*) the way that the project integrated the combined lessons learned is detailed.

Stakeholders? list now updated under section 7 ? The project was developed through discussions with hotel owners (PS) and CSOs by the project team. Still these discussions formulated the content of the project. Still these discussions there is no evidence to put forward at this stage a list of stakeholders. The team will follow up with the PS and CSOs during the project implementation.

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

19th of January 2026 (thenshaw):

(a) Please match objective phrasing presented in this section with the objective displayed in the project overview table.

Please recast the Theory of Change Diagram along lines of TDPS PIF

(b) See comments above re: output and outcome phrasing.

The description of indicative activities is sparse. Please see TDPS PIF as template and populate this section accordingly. A full review of the project logic will then be carried out.

Further:

Consider a more integrated approach across the proposed outputs, particularly those focused on analyses and planning under Components 1 and 2, which currently read as stand-alone activities rather than parts of a coherent planning and implementation pathway.

While the proposed outcomes and technical approaches are generally sound and aligned with the Significant Water Management Issues (SWMIs) identified under the 2019 Lake Ohrid Water Management Plan (LOWMP), the proposal does not yet sufficiently demonstrate why and how these approaches are expected to be effective. Many of the outcomes outlined in Section 1.5, including improved knowledge generation, development of policy and legal instruments, reinstatement of the Lake Ohrid Committee (which appears not to be well functioning), pollution reduction measures, and enhanced stakeholder engagement, are broadly similar to those pursued during the development of the LOWMP in 2019 and its initial implementation phase (2020-2025).

The proposal would benefit from a clearer articulation of whether and to what extent the LOWMP Programme of Measures for 2020-2025 was implemented, and what has changed since 2019 that would enable the proposed approaches to deliver stronger and more durable results. In particular, clarification is requested on:

- ? How the proposed systemic framework differs in practice from previous LOWMP implementation efforts, and why it is expected to be more effective;
- ? Which local or national institutional, political, financial, or technical constraints identified during or after the LOWMP process have been resolved or are now enabling implementation;
- ? How the proposed Master Plan, policy instruments, and strengthened/capacitated Lake Ohrid Committee will move beyond planning and coordination to ensure enforceable action and sustained implementation; and
- ? How the project will avoid repeating previously observed gaps, such as limited uptake of policy tools, weak transboundary coordination, or insufficient translation of knowledge into decision-making.

Strengthening the justification along these lines would increase confidence that the proposed outcomes will meaningfully alter the baseline and accelerate progress toward addressing the SWMIs and achieving the agreed environmental objectives.

30th of April 2026 (thenshaw):

Component 1 - Addressed

Component 2 - Output 2.1.1. For the Joint Fishery Management Plan, the ambition should include "approved by the countries" rather than "submitted to the countries". Given the country ownership of this project, "approved" should be achievable. The project should revise the management plan with country input until it is approved. Please revise the output accordingly.

Similarly for Output 2.4, given country ownership in the project, the Master Plan and Tourism Development Plan should reach approval under the project. Please revise accordingly and also clarify "operationalized", as the assumption is approval before operationalization.

Component 3 -

For the demonstration outputs, please include the socialization and scaling potential elements in the output phrasing.

Please edit the description of Output 3.1.2.

For Output 3.1.4, please recast this output phrasing to less focus on feasibility studies and engineering design (which are not typically funded with the GEF increment) to investment roundtables for port and waterway infrastructure. How much would these feasibility studies cost? Can they be covered through co-financing leveraged through this project?

For Output 3.1.5, please clarify for whom the equipment will be purchased and utilized by. Please better phrase this output to capture the proposed outputs, which include protocols and awareness raising.

Component 4 This component needs restructuring. The Gender Action Plan and Stakeholder Engagement Plan are developed during PPG, not through project activities. These Plans are then implemented through all activities and then monitored via the PCU. Gender elements need to be captured throughout the four components. This output could focus on the gender community of practice and then outreach and communications strategy. For the latter, please ensure that there is a two-way exchange mechanism in place. Please provide some tentative activities under the outreach and communications element.

Please ensure KM is a standalone Component 4, although KM can also be crosscutting in the other Components. It seems appropriate that this Component should mimic the structure of Component 4 of the Chu Talas SAP Implementation PIF. Please revise accordingly.

M&E: Please restructure this Component to mimic the M&E outputs and activities in the Chu Talas SAP Implementation PIF.

***Importantly, stakeholder contributions to deliver each output must be reflected. Again, please use the Chu Talas SAP as the model (Para 41. Key Stakeholders).

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30:

This is addressed as per advice. See in PIF under Project Description/ 4 Theory of Change. The development of the latter follows closely the advice included in the STAP's Theory of Change Primer?

Component 2 - Output 2.1. Thank you. The Output title is amended and an activity for the approval of the plan by the responsible national authorities is included in the text of the Output.

Component 2 - Output 2.4. Thank you, the title of the Output and text is revised so as to reflect that the Master Plan and Tourism Development Plan should reach approval under the project. The operationalization will be achieved through the existing activity (v) that reads as follows *'facilitation of the legal and administrative integration of the Master Plan into the legally binding spatial plans and local developmental strategies of the respective municipalities in Albania and North Macedonia'*. Spatial plans are national level legally binding documents the implementation of which is done by designated authorities following specific

procedures. Integrating the Master Plan provisions in these operational documents will result in the implementation of the Master Plan provisions in a structured way.

Component 3 ?

Socialization and scaling potential elements are included in the phrasing of Output 3.1.1. and the output description.

Output 3.1.2. Thank you. The socialization and scaling potential elements are now included in the output phrasing. The description of Output 3.1.2. was edited accordingly.

Output 3.1.4. Thank you. This output will be financed entirely through the North Macedonia STAR allocation and is of high political priority. We appreciate the guidance regarding the eligible use of the GEF increment and fully agree that the ultimate objective is to mobilize investments for addressing environmental pressures. In response, we have revised Output 3.1.4 as follows:

- Output 3.1.3 reads now: *Investment documentation developed and financing mobilization actions undertaken for the reconstruction/rehabilitation of Ohrid town's port and waterway infrastructure, reducing pressure on the littoral ecosystem.*
- The development of detailed engineering design documents through the GEF grant has been removed, as no dedicated co-financing has been identified at this stage. However, we still recognize that detailed engineering designs remain a strict prerequisite for construction, and we will actively seek to identify dedicated co-financing specifically for these designs during the PPG phase.
- To conduct effective discussions with potential investors, financing institutions, and donors, specific enabling documentation is required. Therefore, we have added the development of such documentation (e.g., a project fiche including feasibility considerations for potential donors and investors, an Investment and Financial Structuring Roadmap, and an Environmental and Social Safeguards scoping) to enable the investment maturing into a bankable package.
- The identification of, and targeted meetings with, possible investors, financing institutions, and donors (the equivalent of investment roundtables) have also been included.

Component 3 - Output 3.1.5. Equipment will be purchased for and utilized by authorities responsible for the enforcement of fisheries legislation and regulation in each of the countries. Output text is amended accordingly. Output phrasing is revised to capture the proposed outputs, which include protocols and awareness raising.

Component 4 ? Thank you. Component 4 is restructured to mimic the respective component of Chu Talas PIF. The Gender Action Plan and Stakeholder Engagement Plan are no longer referred to as activities to be implemented through this component. KM is a standalone Component 4 including communications and capacity building activities. Chu Talas PIF include three outputs. Adapting/adjusting these for the Ohrid PIF, the first two are integrated into one including knowledge management, communications (including a two way exchange mechanism and a list of tentative activities) and a gender community of practice to serve as a dedicated gender mainstreaming knowledge management tool. A second output focuses on capacity building activities. The third focuses on IW:LEARN level and wider transboundary knowledge exchange contributions, including participation in IW:LEARN activities. The ?nowledge Generation and Management section that existed in the PIF is removed and is not any longer a stand-alone sub-chapter; the deleted text is integrated in component 4.

M&E: Done as per advice.

*****Key stakeholders:** Thank you. Part of the information is already included in the Ohrid PIF under ?Indicative Implementation Arrangements?. A column is added in the existing table 3 in Lake Ohrid PIF under section 7. Stakeholder Engagement and Co-benefits listing the Outputs to which each stakeholder group is expected to contribute in, thus linking stakeholder contributions to deliver each output. Additionally, related text is included to indicate which key stakeholders that will contribute what under each output.

Jan 19:

(a) Please match objective phrasing presented in this section with the objective displayed in the project overview table. Please recast the Theory of Change Diagram along lines of TDPS PIF	This is addressed as per advice. See in PIF under development of the latter follows closely the adv Primer?
(b) See comments above re: output and outcome phrasing.	This is addressed as per advice; see responses to and outcome phrasing and structure.
(b) The description of indicative activities is sparse. Please see TDPS PIF as template and populate this section accordingly. A full review of the project logic will then be carried out.	This is addressed as per advice. See in PIF under Outcomes and Outputs. The description of the ou

(b) Further:

Consider a more integrated approach across the proposed outputs, particularly those focused on analyses and planning under Components 1 and 2, which currently read as stand-alone activities rather than parts of a coherent planning and implementation pathway.

This is addressed as per advice. An integrated approach was not adequately evident due to the level of (co) version. Please see below explanations on the level of sections in the revised PIF where this integrated approach is easier reference of the reviewer.

The PIF addresses the need for an integrated approach to mutually reinforcing "Science-to-Policy" pathways. "governance reform without an evidence base is unsustainable".

Here is how this integrated approach is operationalized:

- Establishing a Sequenced "Science-to-Policy" Framework: Instead of treating analyses and planning as disconnected, the PIF presents them as a sequenced process. The generator of the foundational scientific evidence is the analysis of reforms in Component 2. The PIF explains that the analysis will contribute to and provide the basis for the transition that will be developed under Component 2".

- Direct Output-to-Output Linkages

There are direct, functional bridges between the science and planning tools (Component 2):

- Fisheries Management: The joint fish stock assessment of a coordinated effort... together with Output 2.1.1 to negotiate and establish fishing quotas, minimum catch limits, and a harmonized Joint Fishery Management Plan (Output 2.1.2).

- Lake Ohrid Management Plan (LOWMP): The climate-informed hydrological models generated under Output 2.1.1 are explicitly listed as the inputs needed to update the WFD-compliant LOWMP (Output 2.1.3).

- The Master Plan: The overarching Master Plan integrates scientific data, basin assessments, and monitoring data to develop plans developed under Component 2 to guide spatial planning.

- Enforceable Protocols: The culmination of these efforts is the development of enforceable protocols. "Building on the scientific foundations established under Component 2, the PIF outlines the management tools developed under Component 2 to the Lake Ohrid Agreement.

References in the PIF where this integrated approach is detailed:

- B. Project Description/4. Theory of Change: The PIF details the paragraphs explaining the sequenced strategy for Science-to-Policy and Management Cooperation and the "Alignment".

- A. Project Rationale/2. Project Fit within the Country Context: The sub-sections titled "- Harmonizing Institutions and Policies" and "- Capitalizing on Science for Evidence-Based Management" will drive the unified transboundary strategies and actions.

- B. Project Description/5. Project Components, Outputs, and Indicators: The descriptions for Component 1 and Component 2 detail this system of descriptions for Outputs 1.1.4, 2.1.1, 2.1.3, 2.1.4, and the analyses to the resulting planning instruments.

While the proposed outcomes and technical approaches are generally sound and aligned with the Significant Water Management Issues (SWMIs) identified under the 2019 Lake Ohrid Water Management Plan (LOWMP), the proposal does not yet sufficiently demonstrate why and how these approaches are expected to be effective. Many of the outcomes outlined in Section 1.5, including improved knowledge generation, development of policy and legal instruments, reinstatement of the Lake Ohrid Committee (which appears not to be well functioning), pollution reduction measures, and enhanced stakeholder engagement, are broadly similar to those pursued during the development of the LOWMP in 2019 and its initial implementation phase (2020-2025).

The proposal would benefit from a clearer articulation of whether and to what extent the LOWMP Programme of Measures for 2020-2025 was implemented, and what has changed since 2019 that would enable the proposed approaches to deliver stronger and more durable results.

In particular, clarification is requested on:

? How the proposed systemic framework differs in practice from previous LOWMP implementation efforts, and why it is expected to be more effective;

? Which local or national institutional, political, financial, or technical constraints identified during or after the LOWMP process have been resolved or are now enabling implementation;

? How the proposed Master Plan, policy instruments, and strengthened/capacitated Lake Ohrid Committee will move beyond planning and coordination to ensure enforceable action and sustained implementation; and

? How the project will avoid repeating previously observed gaps, such as limited uptake of policy tools, weak transboundary coordination, or insufficient translation of knowledge into decision-making.

Strengthening the justification along these lines would increase confidence that the proposed outcomes will meaningfully alter the baseline and accelerate progress toward addressing the SWMIs and achieving the agreed environmental objectives.

In the revised PIF, we have significantly strengthened the proposal to explicitly articulate why past implementation was insufficient and to propose a structural, enforceable shift in basin governance. Below is a brief description of how these points are addressed:

a. Extent of LOWMP 2020-2025 implementation: The proposal now includes a detailed baseline assessment of what has been achieved and what is needed for broader success.

•Implementation progress: A dedicated table has been added to the PIF under "1. Baseline Description" (see table: *Progress of LOWMP since its adoption*). It explains that there has been progress from national level action.

•The constraint: The PIF explains that the adoption of the LOWMP is constrained by a fundamental administrative and legal discrepancy: sub-basin do not coincide with the official River Basin. The LOWMP can be legally developed according to the national law, but the LOWMP was done as a demonstration activity under the project, not as lessons for the development of joint management plans at the Basin level. The demonstration was successful in that the countries agreed to develop a Drin Basin wide Management Plan, with objectives among sub-basin management plans (that align with national management plans).

b. How the proposed systemic framework differs from previous: The PIF explains administrative constraints that hindered the previous approach: creating "standalone" transboundary documents that do not fit into national legal architectures.

•Under Output 2.1.3 (*An updated Lake Ohrid Management Plan for the management of the watershed in accordance with the law*) designed to bypass the previous boundary mismatch, the PIF explains that it can be formally adopted as a "legally recognized" management plan for the Black Drin (North Macedonia) river basin management plan.

c. Moving beyond planning to ensure enforceable action: The PIF explains regional cooperation and the joint body, backed by the project, to ensure enforceable action.

•Legally Binding Protocols: As described in Section 1.1.4, the PIF explains the move from mere planning to binding governance. Output 2.1.3 (*Agreement related to (i) monitoring and information exchange, (ii) joint management, developed and presented to the littoral countries, and (iii) joint management and managerial outputs into formal, legally binding protocols*) and the Agreement.

•Enforceable Spatial Planning: To enable integration of the environmental objectives of the LOWMP with the local development strategies, Output 2.1.4 (*A Master Plan for Lake Ohrid is developed and implemented*) integrates spatial plans and local development strategies. d. Avoiding past gaps and translating knowledge into decision-making: The PIF explains "insufficient translation of knowledge into decision-making" as a "Science-to-Policy" Theory of Change (detailed in Pathway 1 and Pathway 2).

•Direct Output-to-Output Linkages: Component 2.1.4 is a prerequisite for the governance of the scientific baselines established in Output 1.1.4 (*A joint fishery management plan is developed and implemented*). The foundational input to negotiate the quotas and gear management is the joint fishery management plan.

•Institutional Uptake and Ownership: To avoid the project highlights the linkages between the Lake Ohrid Core Group (DCG) at the political level. Capacity building is provided to the DCG members to ensure their role in the governance of the Lake Ohrid.

strengthened through its engagement in the project. The political interest and importance placed, is the commitment to allocate USD 1 million of its GEF STAR resources (3.1.3 and 3.1.4). The Deputy Prime Minister of Myanmar will support the enhancement of official cooperation with the project.

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

19th of January 2026 (thenshaw): Yes, but PIF needs substantial revision to reflect this additionality.

30th of April 2026 (thenshaw): Addressed

Agency's Comments See changes described above and the revised PIF.

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

19th of January 2026 (thenshaw):

(a) Please describe the indicative institutional setting, including potential national executing partners and the value add of GWP-Med leading execution support. See TDPS PIF as template.

(b) N/A

(c) No. This section is not populated.

(d) No. See comments above.

30th of April 2026 (thenshaw):

(a) " PCU hosted by GWP tentatively comprising a Project Manager, two Project Officers (one for each littoral countries), a Project Assistant, a Communication Officer and a Gender Officer." At first blush, there are too many positions for a lean and efficient PCU. To be further explored in PPG.

It is envisioned that national government institutions will fulfill the "responsible partner" modality?

(c) The section is not populated in the Portal. It is still blank (see below). Please include project baseline under project rationale and include coordination with ongoing initiatives under the "Coordination and Cooperation with Ongoing Initiatives and Project" section.

Coordination and Cooperation with Ongoing Initiatives and Project.

Does the GEF Agency expect to play an execution role on this project?

If so, please describe that role here. Also, please add a short explanation to describe cooperation with ongoing initiatives and projects, including potential for co-location sharing of expertise/staffing

(d) See reviewer response above.

7th of June 2026 (thenshaw): Partly addressed.

Two Project Officers, in addition to a project manager, is not efficient. Please scale down to one Project Manager and one technical project officer that can serve in both littoral countries. This can be revisited during PPG.

10th of June 2026 (thenshaw): Addressed

Agency's Comments

UNDP Response, 10 June 2026:

Addressed as per advice.

April 30:

(a) Thank you. Your advise is appreciated. The text is revised: the PMU will tentatively comprise a Project Manager and two Project Officers. The rest of the services will be provided by consultants. The synthesis of the PMU will further explored in PPG. Text is amended in the PIF chapter Indicative Implementation Arrangements to reflect the changes.

(b) National and local institutions/organizations (scientific institutions/universities and local authorities) will be engaged using the Responsible Partner modality. These and their roles will be identified in detail, discussed and agreed upon during PPG phase. Text is amended accordingly in the PIF chapter ?Indicative Implementation Arrangements?.

(c) UNDP as the GEF Agency, will not play an execution role on this project. For the short explanation on cooperation with ongoing initiatives and projects please see section 1.3 and Table 2 -p25. We also added specific text under the respective PIF section.

(d) Thank you. See responses to the reviewers? advice above.

Jan 19:

(a) Please describe the indicative institutional setting, including potential national executing partners and the value add of GWP-Med leading execution support. See TDPS PIF as template.	This is addressed as per advice. See description of potential national executing partners and the value add at the end of the section <i>B. Project Description</i> / 5. above section ?Indicative Implementation Arrangements of the reviewer under ?1. <i>General Project Information table correctly populated??</i> Building on almost 20 years of continuous work, the combination of scientific, technical, institutional and the project?s capacity to deliver integrated results, its role as Secretariat of the Drin MoU and executing partner, equipped it with deep understanding of transboundary relationships with national and local institutions, monitoring, modelling, and evidence-based basin management, harmonized policy, legal, and technical instruments, operational presence and networks in both Albanian and manage field-based demonstrations, coordinate work and engage local users in adopting sustainable practices in fisheries, and tourism. Its proven experience in developing and facilitating multi-sectoral dialogue, mobilizing scientific stakeholder engagement ensures coherent implementation of community-driven activities. By combining basin management implementation capacities, GWP?Med substantially ensures that project interventions are not only technically sound, socially accepted, and scalable across the wider I
(c) No. This section is not populated.	The description of potential coordination and cooperation with other bilateral/multilateral initiatives can be found in the PIF: - <i>A. Project Rationale</i> / 2. <i>Project Fit within the Corda and non-GEF investments</i>. Under this subsection, it details how the proposed Lake Ohrid project will build on existing projects. It details coordination with: •GEF-Financed Projects: Such as the new GEF/UNEP GEF/UNDP DIKTAS regional karst aquifer project in North Macedonia, and the GEF/UNDP •Bilateral/Multilateral Initiatives: Such as project (risk management), SIDA (ADAPT nature-based management), (waste management, flood directives, Natura 2000) (PONT). - <i>A. Project Rationale</i> / 2. <i>Project Fit within the Corda</i>. This subsection (along with the embedded table <i>Coordination within the Drin CORDA Framework</i>) provides an overview to coordinate operationally, institutionally, and technically and the GEF Drin SAP project. - "<i>Annex 3: Recent and ongoing baseline project activities of the project</i>", contains the detailed objectives of the initiative.
(d) No. See comments above.	This is addressed as per advice of the reviewer ? KM under the section of the Review Sheet: ?3 <i>Implementation dimensions, knowledge management, and monitoring components and appropriately funded??.</i>

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

19th of January 2026 (thenshaw):

(a) Core Indicator 11 must be targeted in this investment. Please include.

Indicator 7.4 must be targeted in this investment. Please set as "1".

Please assess and include target for 7.2 and 7.3. See drop down menu to determine selection.

Indicator 7.1 is noted as no TDA/SAP developed, yet there is the Drin SAP, of which Ohrid is part. Please revise and explain how the project will support this wider SAP implementation.

Please include WDPA ID for Core Indicator 1 target.

(b) It would be helpful to clearly associate the targeted results listed under the various Core Indicators sub-indicators with the corresponding outputs and components. Currently, the linkages between activities, outputs, and targeted results only become apparent upon reading the Core Indicator section, making it difficult to track how specific interventions generate the targeted results.

Regarding the alignment of targeted results and indicators, a review of the Baseline Description, Project Outcomes, and other relevant sections indicates that the 42,000 ha reported under Core Indicator 1 (protected areas) correspond to areas that are already legally established and will be placed under improved management. Accordingly, this target should be reported under sub-indicator 1.2 rather than 1.1. Otherwise, at the PPG phase, it will be necessary to clearly explain where and which new protected areas will be legally established. Similarly, the activities associated with the 9,000 ha target currently listed under sub-indicator 4.1 relate to production landscapes under sustainable land management. This target should therefore be reassigned to sub-indicator 4.3. The agency is also encouraged to explore a more ambitious target under sub-indicator 4.3 and assess opportunities for co-financing that could support an increased level of ambition.

30th of April 2026 (thenshaw):

(a) Core Indicator 7 is addressed

Core Indicator 11 is addressed

Core Indicator 1 is addressed

(b) The CI4 explanation in the PIF states "CI 4 - Area of landscapes under improved practices: CI-4 will be reported for areas where improved agricultural and water management practices are implemented under Output 3.1.2. These include the piloting and upscaling of precision agriculture demonstrations designed to optimize water use, conserve soil, and reduce nutrient and toxic pollution runoff into the basin. At PIF stage, a tentative estimate of 8,000 hectares across both countries is proposed, subject to refinement during PPG once pilot areas are confirmed." Yet the below matrix mentions that this target pertains to "the upper part of the Sateska river (the river diverted to flow into the lake) where the project will employ nature-based solutions to address erosion and alleviate the resulting pressures to the lake's ecosystem." It

seems the former would target 4.3 and the latter would target 4.1. Please explain/revise. Can both be targeted to increase the ambition of this Core Indicator (which the Agency has not addressed)? It looks like Output 3.1.2 would target CI 4.3 and and Output 3.1.3 would target CI 4.1.

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30:

Thank you. The text in the PIF is updated to read as follows: CI-4.1 will be reported for areas (upper Sateska basin) where nature-based solutions will be applied under Output 3.1.3. for reducing diffuse nutrient loading and sedimentation. At PIF stage, a tentative estimate of 8,000 hectares is proposed, subject to refinement during PPG once pilot areas are confirmed.

Further, CI-4.3 will be reported for areas where improved agricultural and water management practices are implemented under Output 3.1.2. These include the piloting and upscaling of precision agriculture demonstrations designed to optimize water use, conserve soil, and reduce nutrient and toxic pollution runoff into the basin. At PIF stage, a tentative estimate of 202 hectares is proposed that accounts for the agricultural area that will be covered through upscaling of the precision agricultural practices (tentatively 1/5 of the agricultural area in Ohrid lake watershed), subject to refinement during project implementation once the initial phase of pilot activities that will determine the scalability of the activities is finalized.

Jan 19:

(a) Core Indicator 11 must be targeted in this investment. Please include. Indicator 7.4 must be targeted in this investment. Please set as "1". Please assess and include target for 7.2 and 7.3. See drop down menu to determine selection. Indicator 7.1 is noted as no TDA/SAP developed, yet there is the Drin SAP, of which Ohrid is part. Please revise and explain how the project will support this wider SAP implementation. Please include WDPa ID for Core Indicator 1 target. (b) It would be helpful to clearly associate the targeted results listed under the various Core Indicators sub-indicators with the corresponding outputs and components. Currently, the linkages between activities, outputs, and targeted results only become apparent upon reading the Core Indicator section, making it difficult to track how specific interventions generate the targeted results. Regarding the alignment of targeted results and indicators, a review of the Baseline Description, Project Outcomes, and other relevant sections indicates that the 42,000 ha reported under Core Indicator 1 (protected areas) correspond to areas that are already legally established and will be placed under improved management. Accordingly, this target should be reported under sub-indicator 1.2 rather than 1.1. Otherwise, at the PPG phase, it will be necessary to clearly explain where and which new protected areas will be legally established. Similarly, the activities associated with the 9,000 ha target currently listed under sub-indicator 4.1 relate to production landscapes under sustainable land management. This target should therefore be reassigned to sub-indicator 4.3. The agency is also encouraged to explore a more ambitious target under sub-indicator 4.3 and assess opportunities for co-financing that could support an increased level of ambition.	This is addressed as per advice. Please see under table. The figure 9,000 ha was corrected to 8,000 (the river diverted to flow into the lake) where the address erosion and alleviate the resulting pressure indicator is populated with the 8,000 ha figure. This is currently under revision through the GEF Drin S Management Plan (LOWMP) that plays the role of scientific basis for the design and implementation under Component 1 will lead to the update of the TDA (hence CI 7.1 is rated 2). With regard to the participation of Inter-Ministerial Committees to be developed as part of Component 2 under the c (specifically Outputs 2.1.1, 2.1.2, 2.1.3, 2.1.4, and Fishery Management Plan, the harmonization of the formulation of an overarching Master Plan and of Protocols to the Lake Ohrid Agreement. These to the enhancement of the role of the existing (he the overall improvement of the framework for the being the means for enhancing the <i>Level of Regional Institutions to support its implementation</i>. There (hence CI 7.4 is rated 4). WDPa is 16347 and is
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5.5 NGI Only: Is there a justification of financial structure and use of financial instrument with concessionality levels?

Secretariat's CommentsN/A

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

19th of January 2026 (thenshaw):

(a) No. The risk matrix needs to include a much more well-articulated assessment of risk and identification of mitigation measures. See TDPS PIF as template.

(b) No. The overall risk rating of low cannot be possible if the ESS risk is rated substantial. Please review and consider whether a substantial risk rating is indeed merited. Please explain how the overall risk rating was determined based on a weighting of all risk categories.

(c) No. ESS is rated as substantial, yet the risk matrix rates in low. Please make congruent. Please revise and consider whether a substantial risk rating is indeed merited. Please explain how the overall risk rating was determined based on a weighting of all risk categories.

30th of April 2026 (thenshaw):

(a) For the capacity risk over the long term, this project should be building capacity of institutions by empowering them to execute some project activities. Hence the reasoning for including national institutions as executing entities in the front matter of the PIF.

For fiduciary, "GWP has demonstrated sound fiduciary performance for more than 2 decades of various projects implementation.". Please explain who conducted this assessment to justify this claim.

(b) Not addressed. The overall risk rating must be substantial if there is a substantial ESS risk. Please revise.

(c) The section pasted below must also reflect this substantial ESS risk rating.

Environmental and Social Safeguard (ESS) Risks

We confirm that we have provided indicative information regarding Environmental and Social risks associated with the proposed project or program and any measures to address such risks and impacts (this information should be presented in Annex D).

Yes

Overall Project/Program Risk Classification

PIF	CEO Endorsement/Approval	MTR	TE
Medium/Moderate			

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30:

New: (a) For the capacity risk over the long term, this project should be building capacity of institutions by empowering them to execute some project activities. Hence the reasoning for including national institutions as executing entities in the front matter of the PIF. For fiduciary, "GWP has demonstrated sound fiduciary performance for more than 2 decades of various projects implementation." Please explain who conducted this assessment to justify this claim.	(a) Thank you, your input is acknowledged. See responses and local institutions in the execution of the project that phase. Indeed an overall assessment for fiduciary performance. This is a statement that is based on the fact that GWP has implemented; there were no findings that would question EA. Further GWP has undergone a micro-assessment for UNDP/GWP Drin SAP project. A Sida evaluation of the positive results https://gwpo-gwp.org/wp-content/uploads/2020/01/final-report-issued-by-sida-1.pdf. Since an overall assessment 20 years was not conducted to support this statement, the table as follows: <i>GWP has undergone a micro-assessment of the SAP project. It has demonstrated sound fiduciary performance in the implementation of the foundational GEF Drin I Project.</i>
New: (b) Not addressed. The overall risk rating must be substantial if there is a substantial ESS risk. Please revise.	Thanks, the overall risk is changed to 'substantial'.
New: (c) The section pasted below must also reflect this substantial ESS risk rating. 	Thank you, it has been addressed.

Jan 19:

(a) No. The risk matrix needs to include a much more well-articulated assessment of risk and identification of mitigation measures. See TDPS PIF as template.	This is now addressed ? see Table regarding Risk B. <i>Project Description / Safeguards Rating</i>
(b) No. The overall risk rating of low cannot be possible if the ESS risk is rated substantial. Please review and consider whether a substantial risk rating is indeed merited. Please explain how the overall risk rating was determined based on a weighting of all risk categories.	This is now addressed ? see Table regarding Risk B. <i>Project Description / Safeguards Rating</i>. The environmental and social benefits through ecosystem restoration, pollution reduction. However, several activities (erosion mitigation measures, fisheries regulation, etc.) in the documents for the reconstruction/ rehabilitation of the Ohrid) have a potential for indirect, induced and cumulative impacts which is not only a transboundary water body but also a cumulative assessment of the overall risk as moderate is due to the environmental and social risks.
(c) No. ESS is rated as substantial, yet the risk matrix rates in low. Please make congruent. Please revise and consider whether a substantial risk rating is indeed merited. Please explain how the overall risk rating was determined based on a weighting of all risk categories.	This is now addressed ? see Table regarding Risk B. <i>Project Description / Safeguards Rating</i>, and

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

19th of January 2026 (thenshaw):

(a) To be determined once initial comments are addressed

(b) To be determined once initial comments are addressed

(c) To be determined once initial comments are addressed

30th of April 2026 (thenshaw): To be evaluated on next round.

7th of June 2026 (thenshaw): Addressed

Agency's Comments Comments of the reviewer are addressed as per advice included herewith, in the Review sheet ? kindly re-assess on this new basis.

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 19th of January 2026 (thenshaw): Yes

Agency's Comments

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 19th of January 2026 (thenshaw): 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

19th of January 2026 (thenshaw): Not addressed.

30th of April 2026 (thenshaw): Addressed

Please explain how this investment contributes to SDG 14 on oceans.

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30: Thank you for the remark. It does not. This was a mistake in the text. SD 14 references are removed from the PIF.

Jan 19: This is now addressed. See PIF under section ?C. Alignment with GEF-8 Programming strategies and country/regional priorities? for explanation on how the project contributes to and how it contributes to the identified target(s) of the Kunming-Montreal Global Biodiversity Framework.

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

19th of January 2026 (thenshaw): No, please see comments above and below.

7th of June 2026 (thenshaw): Addressed

Agency's Comments Comments of the reviewer are addressed as per advise included herewith in the Review sheet ? kindly re-assess on this new basis.

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

Secretariat's Comments

19th of January 2026 (thenshaw): Partly. Please follow TDPS PIF as template.

30th of April 2026 (thenshaw): Please explain whether the stakeholders in both countries consulted have validated this version of the PIF, which is a substantial change from the November/December 2025 period. Importantly, if this has not happened, please carry out this validation before resubmission and document in the PIF accordingly.

7th of June 2026 (thenshaw): As the PIF is now returned to the proponents for minor revision, please now include a reference to the June 3 Drin Stakeholders Conference consultations and any outcomes.

10th of June 2026 (thenshaw): Addressed

Agency's Comments

UNDP Response, 10 June 2026:

In response to the reviewer's feedback, the following text has been added to the PIF: The revised PIF was presented and further consulted with stakeholders during a two hours session in the framework of the 10th Drin Stakeholders Conference in Struga, Ohrid, North Macedonia, on 4 June 2026. A film was used to communicate the need for action ([The Plan to Save Europe's Oldest Lake.mp4](#)) and a presentation introduced the *actions -that would be possibly supported by the GEF- to address environmental and socio-economic pressures on the basin and strengthening the sustainable management of Lake Ohrid watershed*. A moderated discussion enabled feedback from the stakeholders regarding the development of scientific knowledge to drive transboundary governance reforms, including new joint plans as well as the means to use to bridging macro-level policies with localized nature-based solutions to strengthen the region's overall water security. The stakeholders appreciated the effort and agreed that the theory of change and planned project structure and activities are the appropriate and necessary means to address the identified root causes of environmental degradation, implement the priorities of the Lake Ohrid Watershed Management Plan, and enable effective transboundary management. During the session, stakeholders were provided with an overview of the GEF project cycle, including the preparation and approval process. It was clarified that upon GEF approval of the Lake Ohrid PIF, further inclusive consultations will take place during the Project Preparation Grant (PPG) phase to formulate the detailed project design. The consultation engaged a total of 67 stakeholder representatives (34 female and 33 male) from across the Drin Riparians,

including 18 (11 female and 7 male) from North Macedonia and 10 (7 female and 3 male) from Albania. Having the perspectives of stakeholders from beyond the immediate Lake Ohrid littoral countries was beneficial both for the project structure discussions and for strengthening strategic linkages with the wider Drin Basin level.

April 30:

The revised PIF was discussed and consulted during the closure meeting of the regional project ?Integrated Climate Resilient Transboundary Flood Risk Management in the Drin River Basin (Albania, North Macedonia, Montenegro)?, that was held on 17 April 2026 in Tirana, with the members of the Drin Group (officially appointed representatives of ministries responsible for water management) that participate in this AF Project Board.

Although the PIF text has undergone extensive revisions, its core design and structure -as agreed with stakeholders and national authorities-remains the same.

GWP and UNDP utilize the communication channels already established for the GEF Drin Project, reinforced by GWP's role as the Secretariat of the Drin Core Group. Through this ongoing collaboration, GWP and UNDP proactively consult with national authorities and key stakeholders on any politically sensitive issues and any changes to the PIF that are linked with obligations the countries will undertake as a result of this project. These communication channels have been used during the PIF revision rounds.

The PIF will be presented and further consulted with about 100 stakeholders (average number of participants in the Drin Conferences) in a session focused on the Management of the Lake Ohrid (3 June), that is included in the forthcoming 10th Drin Stakeholders Conference that will take place in Struga, Ohrid, North Macedonia, 3-4 June 2026. As this will occur post PIF resubmission these consultations will be included in the PPG

Jan 19: Related information is amended in the revised PIF. Please see PIF under section *D. Policy requirements/Stakeholder Engagement*.

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 19th of January 2026 (thenshaw): Yes

Agency's Comments
Focal Area allocation?

Secretariat's Comments 19th of January 2026 (thenshaw): Yes

Agency's Comments
LDCF under the principle of equitable access?

Secretariat's CommentsN/A

Agency's Comments
SCCF A (SIDS)?

Secretariat's CommentsN/A

Agency's Comments
SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat's CommentsN/A

Agency's Comments
Focal Area Set Aside?

Secretariat's CommentsN/A

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
19th of January 2026 (thenshaw): Partly. The IW contribution to PPG is not tagged to North Macedonia only. It is for the regional activities involving both countries. Please revise.

PPG Amount (\$) ⓘ		PPG Agency Fee (\$)							
150,000		14,250							
GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Programming of Funds ⓘ	Grant / Non-Grant	PPG(\$)	Agency Fee(\$)	Total PPG Funding(\$)	
UNDP	GET	North Macedonia	International Waters	International Waters: IW-3	Grant	117,390	11,152	128,542.00	
UNDP	GET	North Macedonia	Biodiversity	BD STAR Allocation: BD-1	Grant	8,480	806	9,286.00	
UNDP	GET	North Macedonia	Land Degradation	LD STAR Allocation: LD-1	Grant	24,130	2,292	26,422.00	
Total PPG Amount						150,000.00	14,250.00	164,250.00	

30th of April 2026 (thenshaw): Addressed

Agency's Comments Thank you, this is revised now.

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

19th of January 2026 (thenshaw): No. Total co-financing ratio is blank. A GEF investment will not move forward without an acceptable co-financing ratio (aspiration is 1:7). Please include indicative co-financing at PIF stage.

30th of April 2026 (thenshaw):

(i) It is concerning that there is no co-financing from Albania. Please include this commitment at PIF stage.

(ii) Public Investment cannot be recurrent expenditures. Please revise "Public Enterprize ?National Forests, North Macedonia?"

(iii) Please include a UNDP co-financing contribution

(iv) Please consolidate Public Investment lines from "Ministry of Environment and Physical Planning, Noth Macedonia"

(v) The footnote descriptions are not easy to follow, as the footnote numbering is not captured in the co-financing table. Please revise the detailed explanation to "Municipality of Ohrid, North Macedonia. This co-financing is.....". etc.

(vi) Please secure additional sources of co-financing during PPG from CSOs, NGOs, universities etc to demonstrate a mobilized partnership for this investment.

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30:

New: (i) It is concerning that there is no co-financing from Albania. Please include this commitment at PIF stage. (ii) Public Investment cannot be recurrent expenditures. Please revise "Public Enterprise ? National Forests, North Macedonia?" (iii) Please include a UNDP co-financing contribution (iv) Please consolidate Public Investment lines from "Ministry of Environment and Physical Planning, North Macedonia" (v) The footnote descriptions are not easy to follow, as the footnote numbering is not captured in the co-financing table. Please revise the detailed explanation to "Municipality of Ohrid, North Macedonia. This co-financing is. ". etc. (vi) Please secure additional sources of co-financing during PPG from CSOs, NGOs, universities etc to demonstrate a mobilized partnership for this investment.	(ii) Done ? see Indicative Co-financing table (iii) Done ? see Indicative Co-financing table (iv) Done ? see Indicative Co-financing table (v) Done ? see Indicative Co-financing table (vi) Advice is noted. We will strive to secure additional demonstrate a mobilized partnership for this investment
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Jan 19: This is now addressed. See response in your comments above and related tables in the PIF (?Indicative Co-financing? under Annex A, and allocation of co-financing in ?Indicative Project Overview? under General Project Information sections) as well as description of proportionality.

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

19th of January 2026 (thenshaw): Yes

Agency's Comments

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

Secretariat's Comments

19th of January 2026 (thenshaw): Partly.

The Albania LOE is uploaded to the Documents tab but it is not uploaded through the Portal. Only the North Macedonia is uploaded. See screenshot:

Record of Endorsement of GEF Operational Focal Point (s) on Behalf of the Government(s):

Name	Position	Ministry	Date
Betim Lamallari	GEF Operational Focal Point	Ministry of Environment and Physical Planning, Republic of North Macedonia	12/18/2025

30th of April 2026 (thenshaw): Addressed

Agency's Comments It is uploaded now. Thank you.

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

Secretariat's Comments 19th of January 2026 (thenshaw): Yes

Agency's Comments

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 N/A

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 19th of January 2026 (thenshaw): Yes

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

19th of January 2026 (thenshaw):

Please reconsider whether this project merits an overall risk rating of "Substantial", which seems unlikely based on the proposed interventions.

i. The environmental and social risk in the Key Risk table said Low. Please make these risks classification, identified risks and mitigation measures consistent between screening template and key risk table.

ii. Please ensure consultations and engagement with small scale farmers, fishermen and women, informal resource users and vulnerable population to identify potential livelihood impacts and mitigation measures including alternative livelihoods.

iii. Please consider participatory monitoring of integrated water resources

management including Indigenous Peoples.

iv. Please also consider including monitoring indicators related to livelihoods improvement of the watershed.

30th of April 2026 (thenshaw):

(i) Not addressed. The overall risk rating in the Risk Matrix table is now "Moderate", which is not in line with the Agency response below.

The ESS Risk in the Risk table is now rated "Substantial". Yet the ESS Risk rating in the section pasted below is "Moderate" and the pre-screening document is "Substantial". These must be consistent.

Environmental and Social Safeguard (ESS) Risks

We confirm that we have provided indicative information regarding Environmental and Social risks associated with the proposed project or program and any measures to address such risks and impacts (this information should be presented in Annex D).

Yes

Overall Project/Program Risk Classification

PIF	CEO Endorsement/Approval	MTR	TE
Medium/Moderate			

(ii) Addressed, but please note comment on revising Output 4.1.1. GAP and SEP outputs, as these are not project outputs embedded in a Component but rather crosscutting.

(iii) Addressed

(iv) Addressed

7th of June 2026 (thenshaw): Addressed

Agency's Comments

April 30:

New: (i) Not addressed. The overall risk rating in the Risk Matrix table is now "Moderate", which is not in line with the Agency response below. The ESS Risk in the Risk table is now rated "Substantial". Yet the ESS Risk rating in the section pasted below is "Moderate" and the pre-screening document is "Substantial". These must be consistent. 	Thank you, it has been addressed.
ii. Please ensure consultations and engagement with small scale farmers, fishermen and women, informal resource users and vulnerable population to identify potential livelihood impacts and mitigation measures including alternative livelihoods. New: (ii) Addressed, but please note comment on revising Output 4.1.1. GAP and SEP outputs, as these are not project outputs embedded in a Component but rather crosscutting	(i) Thank you. The comment is noted and consultations with women to identify potential livelihood impacts and mitigation measures will be held. See text added in table under 'Environment and Social?.' (ii) Thank you, the comment is noted and addressed. The corresponding changes in the PIF text.

Jan 19:

Please reconsider whether this project merits an overall risk rating of "Substantial", which seems unlikely based on the proposed interventions. i. The environmental and social risk in the Key Risk table said Low. Please make these risks classification, identified risks and mitigation measures consistent between screening template and key risk table.	This is now addressed ? see Table regarding Risk Rating. <i>B. Project Description / Safeguards Rating.</i> The project has environmental and social benefits through ecosystem restoration, pollution reduction. However, several activities (erosion mitigation measures, fisheries regulation, etc.) in the documents for the reconstruction/ rehabilitation of Lake Ohrid) have a potential for indirect, induced and cumulative impacts which is not only a transboundary water body but also a assessment of the overall risk as substantial is due to environmental and social risks.
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ii. Please ensure consultations and engagement with small scale farmers, fishermen and women, informal resource users and vulnerable population to identify potential livelihood impacts and mitigation measures including alternative livelihoods.	Inclusive consultations and targeted engagement users, and vulnerable populations have been emb - Section: <i>A. Project Rationale / 1. Baseline Desc</i> Under Barrier 4: Social and Capacities, the PIF s current lack of communication and inclusion prev "women and men resources users and those enga states that without embedding inclusive governan external impositions, which erodes local ownersh - Section: <i>B. Project Description / 7. Stakeholder</i> This section directly responds to the need to iden detailed stakeholder mapping table that explicitly "associations of farmers," "fishermen associatio enterprises (including local farmers and fisherme The section describes that a gender-responsive st developed right from the project preparation (PP their voices are heard, and their needs are address - Section: <i>B. Project Description / 5. Project Con</i> <i>Output 4.1.1)</i> Under Output 4.1.1 (<i>Gender mainstreaming and</i> <i>strategic communication activities, developed an</i> <i>and sustainability</i>), the PIF details the operationa states that the strategy will map and categorize "c fisheries actors, and local communities". Cruciall as community-level dialogues and structured con involvement of marginalized groups, including w - Section: <i>Project Description / 5. Project Compo</i> <i>Outputs 3.1.2 and 3.1.5).</i> Component 3 links these consultations directly to introduction to Component 3 emphasizes that the demonstrations will rely on "highly participatory men practitioners and users to ensure inclusive p •Output 3.1.2 (Precision agriculture): Provides f - farmers, actively engaging women practitioners t - safeguarding their agricultural livelihoods. •Output 3.1.5 (Fisheries enforcement): Explains - awareness campaigns will be organized among fi - adoption of best practices that "support equitable
iii. Please consider participatory monitoring of integrated water resources management including Indigenous Peoples.	There are no populations classified as (distinctive of the Basin is indigenous to the region and littor

iv. Please also consider including monitoring indicators related to livelihoods improvement of the watershed.

Linking ecosystem management directly to local livelihoods is a core strategy of this project to generate community-based results. The PIF includes the basis for tracking livelihoods during the project design phase:

- Tracking direct beneficiaries via GEF Core Indicator 11. GEF Core Indicator 11 is set to track the number of people who benefit from the project's on-the-ground demonstration activities to monitor equitable impacts.
- Monitoring and evaluation (Output 5.1.1 & PPG Phase 2). Under Output 5.1.1, the project will establish a gender-responsive Learning (MEL) system. As required for the CEC, the Results Framework will be developed during the project design work with stakeholders during the PPG phase to track progress related to livelihood improvements (e.g., specific yields from fisheries) to complement the broader livelihoods Framework.

Annex E: Rio Markers

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

Secretariat's Comments

19th of January 2026 (thenshaw):

Please carefully review the selected Rio Markers. Not every category should be labeled a significant objective. Are there any primary objectives

30th of April 2026 (thenshaw): Addressed

Agency's Comments

See Annex E: Rio Markers.

CCM is not targeted (0), CCA is significant (1), BD is principal (2), and LD is significant (1).

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments

19th of January 2026 (thenshaw):

Taxonomy classifications are incomplete. Please populate.

30th of April 2026 (thenshaw): Addressed.

Agency's Comments This is now addressed. See related tables in the PIF and Annex F: Taxonomy Worksheet.

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 N/A

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments

10th of January 2026 (thenshaw): No. Please see above comment and resubmit. Thank you.

19th of January 2026 (thenshaw): No. Please see above comments and resubmit. Thank you.

30th of April 2026 (thenshaw): No. Please see above comments and resubmit. Thank you.

29th of May 2026 (thenshaw): No. Please see above comments and resubmit. Thank you.

7th of June 2026 (thenshaw): No. Please see above comments and resubmit. Thank you.

10th of June 2026 (thenshaw): No. Please see above comment and resubmit. Thank you.

12th of June 2026 (thenshaw): Yes

Agency's Comments Thank you for the constructive comments. These are now addressed as per recommendations. Kindly re-assess on this new basis.

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

Secretariat's Comments

Agency's Comments

Review Dates

	PIF Review	Agency Response
First Review	1/10/2026	
Additional Review (as necessary)	1/19/2026	

	PIF Review	Agency Response
Additional Review (as necessary)	4/30/2026	
Additional Review (as necessary)	5/29/2026	
Additional Review (as necessary)	6/7/2026	