

Development of Cukurova Delta Lagoons for Sustainable Conservation of Biodiversity in Adana

Review CEO Approval and Make a recommendation

Basic project information

GEF ID
12274
Countries
Türkiye
Project Name
Development of Cukurova Delta Lagoons for Sustainable Conservation of Biodiversity in Adana
Agencies
FAO
Date received by PM
1/29/2026
Review completed by PM

Program Manager
Celine Augereau ep Coisy
Focal Area
Multi Focal Area
Project Type
MSP

CEO Approval Request

Part I - General Project Information

1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared

Agency Response

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

Secretariat comment at CEO Endorsement Request

04/23/2026

Cleared.

02/10/2026

Not cleared

The project does not align with CCM eligibility criteria under objective 1.4 (see comments below). While the activities may have limited adaptation co-benefits, they do not correspond to CCM eligibility criteria. Please remove tag to CCA and CCM Rio markers. Change BD Rio marker from Significant objective 1 to Principal objective 2.

Agency Response

Agency response - 23 April 2026:

The Rio Markers have been revised in line with the provided guidance. The CCM and CCA markers have been removed, as the project does not meet CCM eligibility criteria and climate-related benefits are considered co-benefits. The biodiversity marker has been upgraded to ?Principal (2)?, reflecting the project?s primary focus on biodiversity conservation and ecosystem restoration, as clearly articulated in the objective and Components 1 and 2.

2. Project Summary.

a) 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?

b) Does the summary capture the essence of the project, is well written and is it within the max. of 250 words?

Secretariat comment at CEO Endorsement Request

04/23/2026

a) Cleared.

02/10/2026

a) Not cleared.

Please describe the ecosystems and biodiversity to be targeted. The current situation regarding the global significance of the biodiversity targeted is not detailed nor justified. Please describe the landscapes in regards of global situation (Hotspot of BD, KBA, Global 200, Ramsar, WH site, endemic plant area...), identifying main ecological corridors, describing the trends and issues in terms of BD degradation and conservation.

The current summary does not really describe the drivers of BD loss and how the project will tackle those to reverse the trend of BD loss. Please provide elements of analysis of the situation and explain how the project will, through the different components address those drivers.

b) Not cleared. See comments on alignment and revise the summary.

Agency Response

Agency response - 23 April 2026:

a & b) The project summary (Paragraphs 1-4) has been revised, within the word limit margin, to clearly describe the global significance of the Chukurova Delta lagoons, including Ramsar sites and critical habitats for migratory birds and endangered species. It now identifies key drivers of biodiversity loss (unsustainable fisheries, pollution, sedimentation and climate change) and explains how Components 1-4 address these through governance, restoration, sustainable practices and monitoring.

3. Project Description Overview

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?

c) Are gender dimensions, knowledge management, and M&E included within the project components and appropriately funded?

d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?

e) Is the PMC equal to or below 10%? If above 10%, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

05/04/2026

b) Cleared.

c) Cleared.

04/23/2026

a) Cleared.

b) Not cleared. Please consider using the same wordings and names in the text of the description overview and the diagram of ToC. Indeed, while the concept of integrated landscape approach is well present in the project description overview, it does not appear anymore in the diagram, either in the approach detailed in the description of the project. Please correct the text and diagram consistently.

c) Not cleared. The budget for M&E budget is still 5.5% of GEF resources. Please address the previous comment.

d) Cleared.

e) Cleared.

02/10/2026

a) Not cleared. The Project is more LD and BD focused. Please revise the Project objective consistently.

b) Not cleared. Please see comments on box 6C and 5B c. The Theory of Change does not clearly explain the long term impacts expected by the project and the assumptions. The project's logic is not well explained, please revise.

c) Not cleared. Please revise making gender dimensions more visible in the design framework.

M&E budget is currently 5.5% of GEF resources. Typically such projects would carry M&E budgets of 5%. Please adjust.?

d) Not cleared. Please correct co-financing contribution to make it enter in the threshold of 10%, currently it is 11.11 %.

e) Not cleared. Please correct co-financing contribution to make it enter in the threshold of 10%, currently it is 11.11 %.?

Agency Response

Agency response - 01 May 2026:

b) The project description and Theory of Change (ToC) have been revised to ensure full consistency in terminology and conceptual framing. The concept of integrated landscape management has now been systematically reintroduced and aligned across both the narrative description and the ToC diagram. Specifically, the same wording is used to describe the approach linking land, lagoon, and marine systems, and this is now explicitly reflected in the ToC pathways, components, and outcomes.

c) M&E budget has been revised accordingly.

Agency response - 23 April 2026:

a) The project objective has been revised to ensure clarity and consistency with the project's primary focus on biodiversity conservation and land management. It now clearly emphasizes ecosystem restoration, improved lagoon management, and sustainable practices as means to deliver biodiversity and land degradation benefits.

b) The Theory of Change has been revised to clearly articulate the project logic, including causal pathways from activities to outputs, outcomes and long-term impacts, as well as key assumptions. Components, outcomes and outputs have been streamlined and aligned to demonstrate a coherent progression from enabling conditions to on-the-ground interventions and sustained behavioral change, consistent with the core indicators. The revisions primarily strengthen the document through clearer articulation of the theory of change, improved alignment with GEF-8 priorities, and more detailed descriptions of components and activities. They also enhance clarity on governance arrangements, stakeholder engagement, and gender considerations, while providing more detailed explanations of restoration and monitoring approaches.

c) The project has been revised to strengthen the integration of gender dimensions across the design framework, including in stakeholder engagement, capacity building, and governance mechanisms. In addition, the M&E budget has been adjusted.

d-e) The co-financing contribution to PMC has been corrected.

4. Project Outline

A. Project Rationale

- a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?
- b) Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?
- c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?

Secretariat comment at CEO Endorsement Request

05/04/2026

a) Cleared.

04/23/2026

a) Not cleared. The biodiversity targeted has been described but, please address in full the comment, by completing with the description of the existing different management plans in place in the protected areas and explaining the project's links with them.

b) Cleared.

02/10/2026

a) Not cleared.

Please describe the ecosystems and biodiversity to be targeted, targeted from ecological features more than climate perspectives. The current situation regarding the globally significance of the biodiversity targeted is not detailed nor justified. Please describe the landscapes in regards of global situation (Hotspot of BD, KBA, Global 200, Ramsar, WH site, endemic plant area...), identifying main ecological corridors, describing the trends and issues in terms of BD degradation and conservation in an integrated landscape approach. The deltas targeted are protected areas (national parks), and the improvement of management planned does not appear link to the management plan of the protected areas.

Drivers of environmental degradation are well described.

b) Not cleared. Please precise for each stakeholder its role in detail in the project (governance, concertation, decision...), and precise if they already have been concerted, in a table for example.

c) NA

Agency Response

Agency response - 01 May 2026:

a) The project rationale has been revised to clarify that, while protected area and regulatory frameworks are in place, fully operational integrated lagoon management plans are currently lacking and implementation remains fragmented. The project will build on these existing frameworks by developing and operationalizing integrated lagoon management plans aligned with protected area objectives and fisheries regulations, thereby strengthening management effectiveness and coordination.

Agency response - 23 April 2026:

a) The Project Rationale has been revised to strengthen the ecological description of the target system, clearly presenting the ?ukurova Delta lagoons as globally significant coastal wetland ecosystems, including Ramsar sites and Key Biodiversity Areas, and highlighting their role as ecological corridors for migratory species. The revised text emphasizes biodiversity values, conservation status, and integrated landscape dynamics, and clarifies linkages with existing protected area management frameworks, while maintaining the analysis of key degradation drivers.

b) The stakeholder section has been revised to clearly specify the roles and responsibilities of each stakeholder, including government institutions, cooperatives, private sector, and local communities, across governance, implementation, and decision-making processes. Their contributions to project outcomes are now detailed, and a structured description of stakeholder engagement and consultation has been included.

5 B. Project Description

5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the thrust and basis (including scientific) of the proposed solutions, how they provide a robust solution and listing the key assumptions underlying these?

b) 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?

c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks are properly justified? Is there an indication of why the project approach has been selected over other potential options?

d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?

f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?

g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this MSP)?

h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?

i) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component description/s?

j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?

l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

05/04/2026

a) Cleared.

c) Cleared.

i) Cleared.

k) Cleared.

04/23/2026

a) Not cleared. Please consider using the same wordings and names in the text of the description overview and the diagram of ToC. Indeed, while the concept of integrated landscape approach is

well present in the project description overview, in the titles, it does not appear anymore in the diagram, either in the approach detailed in the description of the project. It has a significant impact on the logic of the approach and the way the project address the drivers of BD loss at landscape level. Please correct and improve the text and diagram consistently.

b) Cleared.

c) Not cleared.

- Component 1: It is still not clear how this component will address drivers of degradation and prevent new degradations at landscape level, including landscape and seascape use planning. Links with improvement of agricultural practices are not obvious. Please, consider clarifying actions dedicated to agricultural and terrestrial planning, and to improvement of policies.

- Component 2, 3, 4: Cleared.

d) Cleared.

f) Cleared.

g) Cleared. The project has been revised with a clarified logical approach to address drivers of BD loss at landscape level. It will ensure resilience by improving land and sea use planning and improving practices, restoring degraded ecosystems, and promoting changes in practices and knowledge.

h) Cleared

i) Not cleared. Please address the comment: review the Gender Action Plan which still referred to Output 1.3.2 and Output 3.2.3. These outputs are not in the project document and the GAP and the Prodoc still mention them in the budget.

j) Cleared.

k) Not cleared. See comment above on improvement of agricultural policies, planning and practices.

l) Cleared. With the restructuring the project demonstrates the capacity to transform the current system, by addressing drivers of BD loss and promoting new integrated approach and practices.

02/10/2026

a) Not cleared. See comments above and below regarding the integrated landscape approach and BD alignment to make clearer the logic of the project, and revise the ToC consistently. This should clearly demonstrate the impacts of the project on drivers of environment degradation, and its capacity to reach long term objectives in terms of ecosystems and BD conservation in the targeted areas. In particular the approach should link the protected areas targeted by the project to the management and improvement of practices expected by the project.

b) Not cleared. Please precise in a table how the project will complete or build on previous initiatives in the country or in the areas targeted.

c) Not cleared. Please, for each components precise clearly the outputs and activities to be implemented.

- Component 1: It is not clear how this component will build on elements provided by component 2 on policies improvement and strategic planification. And also, how the project will ensure long term restoration by addressing drivers of degradation and preventing new degradations. The

outcome 1.3 based on governance improvement is supposed to ensure long term success but does not seem sufficient. Outcome 1.2, by creating buffer zones, does not intend to diminish the quantity of intrants, one of the drivers of BD loss. Precise if environmental impacts studies will be carried out to ensure fully success to actions of restoration. Please, consider clarifying actions dedicated to sustainable practices as it is not clear if the actions on development of new practices in agriculture are expected to decrease level of intrants coming in the lagoons (ex: definition of new guidance or new policies). Clarify the outputs. Currently it seems that a Strategy and only trainings are proposed to farmers, but definition of practices collectively adopted is not explicit.

Please consider dedicating this component only on restoration, definition of good practices and community engagement.

- Component 2: Please clarify what kind of new policies and guidance will be implemented. Precise if new land/sea use planification will be designed. Currently only analysis of gaps and a roadmap of policy improvement is planned to be delivered, and trainings. Precise content of the management plan expected for the lagoons as it expects to address resources management, sustainable use and BD conservation.

Please consider addressing in this component all outputs and activities linked to planification, new policies, strategies, (definition of buffer zones, protected areas, fishing prohibited areas...), improvement of practices

- Component 3: Please precise the roles of Research institutions and Turkish Universities in providing and collecting data. Precise if the youth will be involved in that program of monitoring and if Universities will use information in their curriculum or research.

This component integrates in output 3.1.2 a revision of Fishing prohibited areas.

Please consider dedicating this component 3 only to Monitoring, Evaluation and knowledge, and addressing all actions of planification, strategy, conservation in component 2. This one should include: Definition of new strategy, planification (definition of buffer zones, protected areas, fishing prohibited areas...), new policies, new practical guidelines .

Please also consider gathering all actions of knowledge production, transmission and trainings in the same component.

d) Not cleared. Please describe the baseline scenario and the project incremental reasoning.

e) Cleared.

f) Not cleared. Please revise the table with BD and LD FA, even if source of funds remains CC star (full flexibility).

g) Not cleared. Currently the project does not clearly demonstrate its impacts on drivers of BD and environmental degradation. Please revise the project consistently with comments provided on alignment and components.

h) Not cleared.

Please develop on role of research institutes and universities and the place they will give to youth in collecting and analyzing data, and in the curriculum.

Also precise role of women in decision making, in governance, in communication and awareness, trainings. Are they trainees or teachers ?

In addition, while it is well noted that SEP elaborates on the roles of NGOs, cooperatives, and farmer association, please incorporate information on project approach and plans to engage and

consult local communities and local fishers and farmers and other beneficiaries in project implementation.

i) Not cleared. Kindly ensure that knowledge products to capture lessons learned and best practices in advancing women's empowerment in knowledge products produced, and in reports and evaluation (PIR, MTR, TE).

Please review the Gender Action Plan which referred to Output 1.3.2 and Output 3.2.3. These outputs are not in the project document. Please amend as needed.

The GAP notes: "The project budget will allocate specific and sufficient resources to ensure the implementation of the above Gender Action Plan..." However, a budget of 1,730.00 does not seem to be sufficient to carry out the gender-specific measures indicated in the GAP and the prodoc. Please elaborate on how it will ensure implementation? Are there other resources not reflected in the GAP which the Agency plans to tap? Please explain.

On Core Indicator 11, 30% share of women among the beneficiaries is below GEF Partnership ambition. Could the Agency consider increasing this closer to parity?

j) Not cleared. See comments above on knowledge and precise in Component 3 the communication and knowledge strategy to be developed, precisising the publics and tools.

k) Not cleared. The project does not clearly address the policy coherence. Please provide an analysis of current policies harmful to environment and biodiversity and precise how the project will address these issues. Please explain how you will work with different ministries and administrations to explore and provide consistency in new policies and guidelines.

l) The project need to be revised to fully demonstrate its transformative and innovative approach.

Agency Response

Agency response - 01 May 2026:

a) This has been addressed. The Theory of Change diagram and narrative have been revised to consistently reflect the integrated landscape management approach, ensuring alignment in terminology and logic across the project description and visual representation.

c) Thank you for this comment. The Theory of Change and Component 1 have been revised to clarify how landscape-level drivers of degradation are addressed and prevented.

Component 1 now explicitly includes agricultural policies and land-use planning in the gap analysis, addressing key drivers such as nutrient runoff and sedimentation. It also strengthens the integration of biodiversity into land and seascape planning, ensuring alignment between surrounding production systems and lagoon conservation objectives.

Capacity-building activities have been updated to include the application of integrated landscape management in sectoral planning. These revisions clarify how Component 1 supports both addressing existing degradation and preventing new pressures, with clear links to sustainable agricultural practices under Component 2.

i) The Gender Action Plan has been revised to align with the updated project design and results framework. Actions now reflect the current components and outputs (notably 2.2.1, 2.2.2, 2.2.3, 3.1.1, and 3.2.2), with clearer links to integrated landscape management, sustainable fisheries, and agricultural practices. Outdated references and activities have been removed, and gender targets have

been harmonized (minimum 40% women participation). These revisions ensure consistency with the project's theory of change and implementation approach.

k) Component 1 has been revised to more clearly address agricultural policies, planning, and practices as key drivers of degradation. The gap analysis now explicitly includes agricultural policies and land-use planning frameworks, identifying impacts such as nutrient runoff and sedimentation. In addition, policy and regulatory measures have been strengthened to integrate biodiversity considerations into agricultural and land-use planning, improving alignment between production systems and lagoon conservation objectives. These revisions clarify how Component 1 contributes to addressing and preventing degradation at the landscape level, with clear links to the implementation of sustainable agricultural practices under Component 2.

Agency response - 23 April 2026:

a) The Theory of Change has been significantly revised to clarify the project logic, including causal pathways linking interventions to reduced drivers of degradation and long-term biodiversity conservation outcomes. It now better reflects the integrated landscape approach and explicitly links protected area management with improved practices in surrounding landscapes, supported by clear assumptions and evidence-based interventions. The revised structure more clearly reflects the project logic, moving from strengthening the enabling environment (Component 1 on policy, governance and capacity), to implementation of on-the-ground interventions (Component 2), and to improved stakeholder practices and behaviors (Components 3 and 4), ultimately leading to sustained biodiversity and climate resilience outcomes.

b) The Project document has been revised to include a structured table detailing how the project builds on and complements ongoing and previous initiatives (GEF and non-GEF), clearly indicating synergies, gaps addressed, and added value in the targeted areas. Please refer to the table under Paragraph 119, Section C.

c) All components have been restructured to better reflect the project's causal logic and Theory of Change:

Component 1 (Enabling environment): Now focuses on policy, regulatory frameworks, and institutional capacity, establishing the foundation for effective and sustained implementation. This was previously addressed under a different component but has been brought forward to reflect its role as a prerequisite for downstream interventions.

Component 2 (Implementation): Now consolidates all on-the-ground interventions, including ecosystem restoration, lagoon management planning, zoning measures (e.g. buffer zones, fishing restrictions), and sustainable production practices. This ensures a clear link between actions and the main drivers of degradation.

Component 3 and 4 (Knowledge, monitoring and capacity): Now focuses on monitoring systems, data generation, knowledge management, and capacity development, ensuring adaptive management and long-term sustainability. Roles of research institutions and learning mechanisms have been clarified.

This restructuring improves coherence, avoids overlaps, and strengthens the logical flow from enabling conditions to implementation and sustained behavioral change. Brief descriptions of the components are provided in paragraphs 44-57, while detailed activities under each outcome are presented from paragraph 58 onward.

d) The Project document has been revised to clearly describe the baseline scenario (in the project rationale section), including ongoing national investments and existing management efforts in the lagoon systems. The incremental reasoning has been strengthened to explain how GEF support addresses key gaps such as integrated landscape management, restoration at scale, and coordinated governance thereby enabling delivery of global environmental benefits, particularly in biodiversity conservation and ecosystem resilience.

f) Thank you for the comment. The financing tables have been revised to reflect the Biodiversity and Land Degradation focal areas. The revised table ensures consistency with project objectives and demonstrates a cost-effective allocation of resources.

g) The Components have been revised as per the above comments.

h) The Project document has been revised to further detail stakeholder roles under each Component activity. The role of research institutions and universities is now clarified, including their involvement in data collection, analysis, and knowledge dissemination, with opportunities for youth engagement through training, research, and field activities. Gender dimensions have been strengthened, specifying women's roles not only as beneficiaries but also as active participants in decision-making, governance structures, training, and awareness activities. In addition, the approach to stakeholder engagement has been expanded to clearly describe how local communities, fishers, farmers, and cooperatives will be actively consulted and involved throughout project implementation.

i) The framework for Gender Analysis and Gender Action Plan (Annex K attached separately) provides the basis for the further Gender Analysis and the Gender Action Plan to be implemented in the project activities. The Gender Action Plan will subsequently be revised based on the findings of the Gender Analysis that will be conducted during the inception phase of the project. Furthermore, the Gender Action Plan has been developed in alignment with the project's logical framework.

The budget allocation for gender-related activities has been reviewed and clarified to ensure that adequate resources are mobilized across components, including capacity building, stakeholder engagement, and knowledge management activities. The ProDoc also reflects mainstreaming of gender across all outputs, leveraging broader project resources to support implementation of the Gender Action Plan. In addition, the target for Core Indicator 11 has been revised to increase women's participation, moving closer to parity in line with GEF ambitions.

j) The Project document has been revised to further detail the knowledge management and communication approach under Component 3, including the development of a structured strategy that specifies target audiences, communication tools, and dissemination pathways. It now clearly outlines how knowledge products, lessons learned, and best practices will be generated, shared, and used to support stakeholder engagement and replication.

k) The project has been revised to strengthen the analysis of policy coherence, identifying gaps and inconsistencies in existing policies related to fisheries, agriculture, and water management that may contribute to environmental pressures. The project now clarifies how it will support harmonization of policies and regulations, including through inter-institutional coordination mechanisms and engagement with relevant ministries and authorities to ensure alignment with biodiversity conservation objectives.

l) The project has been revised to better articulate the project's transformative approach, highlighting the shift from fragmented, sectoral management to an integrated landscape approach linking policy, restoration, and sustainable practices. It also emphasizes innovation through ecosystem-based management, adaptive monitoring systems, and multi-stakeholder governance, with clear pathways for replication and scaling up at national and regional levels.

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project.

a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?

b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?

c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).

Secretariat comment at CEO Endorsement Request

04/23/2026

a) Cleared.

b) Cleared.

02/10/2026

a) Yes, cleared. Please revise the legend: it seems that there is an inversion on Flow fund and Flow report.

b) Cleared. Please answer the question in the portal

Will the GEF Agency play an execution role on this project?

c) Cleared.

Agency Response

Agency response - 23 April 2026:

a) The legend has been corrected to properly reflect the distinction between 'Flow of Funds' and 'Flow of Reports,' ensuring consistency with the institutional arrangements and funds flow diagram.

b) The question has been answered by confirming that FAO will not have an execution role within the project.

5.3 Core indicators

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 targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

05/04/2026

a) Cleared.

04/23/2026

a) Not cleared.

The comment has not been used for CI 1. The maps provided show terrestrial part for which agricultural measures may be implemented in buffer zones, or at least those areas are terrestrial protected areas under improved management, or restoration. Please correct. (New regulations should apply to the whole protected areas not only a part, as they could be considered as improvement of management for those protected areas, even in buffer zones).

In the previous version, 500 Ha of new marine protected areas were programmed. Please justify why this has disappeared from the targets, or correct the table. As the project is BD focused, this is an important CI.

02/10/2026

a) Not cleared. Considering the numbers of deltas targeted and their status of national parks and KBA, please revise the indicators used and the targets which appears considerably low regarding the areas targeted.

CI 1 could be used for terrestrial parts of the deltas (Terrestrial protected areas created or under improved management effectiveness)

CI 2.2: the target is very low considering the scope of the project and surface of the deltas, and the ambition to address new policies and new guidance on practices. New regulations should apply to the whole protected areas not only a part, as they could be considered as improvement of management for those protected areas, , even in buffer zones.

Agency Response

Agency response - 01 May 2026:

We confirm that we have aligned the Core Indicators in line with your guidance (following an email exchange):

The full extent of Akyatan and Yumurtal?k protected areas is reported under CI 2.2 (marine protected areas under improved management effectiveness), given their official designation and the lack of disaggregated spatial data.

All restoration activities are reported under CI 3.4 (area of wetlands under restoration).

Areas under sustainable agricultural practices (GAP) in surrounding landscapes (outside the PA) are reported under CI 4.3 (area of landscapes under sustainable land management in production systems).

Agency response - 23 April 2026:

a) The core indicators and targets have been revised to better reflect the scale and ambition of the project across the lagoon systems.

Targets for improved management effectiveness (CI 2.2) have been adjusted [34,653 ha] to align with the full extent of targeted protected areas and associated marine ecosystems. The use of additional relevant indicators has also been reviewed to ensure consistency with the types of interventions (including governance, restoration, and sustainable practices).

CI 3.4 now includes the restoration of 100 ha of degraded wetlands; CI 4 - adoption of improved practices across 50 ha of production landscapes; as a co-benefit of the project's contribution to climate change mitigation, GHG emission reductions are estimated at approximately 7,993 tCO₂e. In addition, the project will enhance ecosystem resilience, improve water quality, and support sustainable livelihoods, benefiting over 1,900 people [CI 11].

Overall, the targets have been strengthened to remain realistic while better capturing the project's contribution to global environmental benefits.

5.4 Risks

a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?

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 and consistent with requirements set out in SD/PL/03?

Secretariat comment at CEO Endorsement Request

04/23/2026

a) Cleared.

c) Cleared.

1) Cleared. The comment states that "There are no local communities defined as minorities in the region" and that consultations took place to identify the main stakeholders.

2) Cleared.

3) Cleared.

02/10/2026

a) Not cleared. Please include additional information in the risk table on risk related to stakeholders beyond gender issues.

b) Cleared.

c) Not cleared. It is acknowledged that the ESS supporting documents (checklist, ESMF, stakeholder engagement plan, and minutes of validation workshop) have been included and that the overall ESS risk level is classified as Moderate.

The following comments are provided, and corresponding actions are requested:

1. The ESMF mentioned *?Indigenous and Local Landowners?* as key stakeholders, *?Indigenous and Local Landowners: Owners of lands within or adjacent to the Delta who are concerned with land rights, the protection of natural resources, and potential changes to land use regulations.?* (page 36). Please clarify how the presence (or absence) of Indigenous Peoples and local communities has been assessed in the project areas. This explanation will help verify the justification for the application of ESS8 across the supporting documents. If the assessment is still ongoing or requires further validation, please include a clear note indicating this.
2. The environmental and social Key risk table in the CEO Approval document said that *?Social risks primarily focus on the livelihoods of the fishers, who may face temporary access restrictions during lagoon restoration, and on gender disparities in employment opportunities.?* (page 40) Please provide livelihood restoration plan, which clearly outlines how potential temporary restrictions or impacts on fisheries and related livelihoods will be mitigated as a part of project activities with responsibility, budget and timeline at the CEO Approval stage.
3. In the Stakeholder Engagement Plan, and in relation to Comment 1 above, please describe the methodology for identifying vulnerable local communities including informal resource users including women and youth and Community based organizations (CBOs). If any vulnerable communities and CBOs have already been identified, please specify them. Additionally, provide further detail on how these communities will be meaningfully consulted and actively engaged throughout project implementation.

Agency Response

Agency response - 23 April 2026:

a) The risk assessment has been revised to include additional stakeholder-related risks beyond gender, such as potential resistance from local communities, fishers, and farmers, as well as coordination challenges among institutions. Corresponding mitigation measures such as participatory governance mechanisms, early engagement, and incentives for adoption of sustainable practices have been further detailed.

c) Regarding the comments on ESS;

1) The project will not negatively impact the living standards of the local population engaged in traditional fishing, livestock farming, and agriculture in the lagoon. However, there is no classification of minority or indigenous people in the region. On the contrary, it will contribute to the sustainable use of natural resources by providing training to the local population on the processing and marketing of fish and fishery products, as well as good agricultural practices. In addition, income diversification will be provided by offering training in new income-generating jobs to participants on a voluntary basis. There are no local communities defined as minorities in the region.

2) The deepening and canal rehabilitation activities to be carried out during the project implementation phase. The activities were being consulted to local fishers and Fisheries Cooperative officials during the preparation phase. Therefore, since the deepening and canal rehabilitation operations to be carried out in the specific zones, not the whole project area. Accordingly, the planned works will not limit or restrict collective activities during the implementation period. For this reason, it is foreseen that there will be no significant loss for the fishermen.

3) Preliminary consultations during the project preparation phase have already identified several relevant local stakeholders, including fisheries cooperatives operating in Akyatan and Yumurtal?k lagoons, local farmer groups in surrounding agricultural areas, and local environmental associations involved in wetland conservation. These organizations represent important community-based bodies that will be engaged during project implementation. Meaningful engagement will be ensured through structured consultation mechanisms, including community meetings, participatory workshops, training activities, and the establishment of a local consultation platform for lagoon management. Gender-responsive approaches will be applied to ensure the participation of women and youth, including targeted training programs and inclusive decision-making processes. These mechanisms will enable local communities and CBOs to actively contribute to lagoon restoration, sustainable fishery management and biodiversity conservation efforts.

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

Secretariat comment at CEO Endorsement Request NA

Agency Response

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

6.1 Is the project adequately aligned with Focal Area objectives, and/or LDCF/SCCF strategy?

Secretariat comment at CEO Endorsement Request

04/23/2026

Cleared.

02/10/2026

Not cleared.

- The project does not align with CCM eligibility criteria under objective 1.4, as it does not target high carbon ecosystems such as mangroves, peatlands, seagrass ecosystems, but sand lagoon and performs water-related resilience activities (sand and sediment works to optimize water flow) with negligible impact on carbon sequestration, and on a negligible hectareage. This is complemented

by fisheries focused work which has mainly an adaptation entry point and little relevance to mitigation. While the activities may have adaptation co-benefits, they do not correspond to CCM eligibility criteria.

At this point it is the most relevant to re-program the funds towards BD and LD focal areas using full flexibility.

(If you still consider climate change mitigation to be your priority, you will have to target another ecosystem with high carbon potential, and target activities on its protection and/or restoration in a cost-effective way, aligning activities with those outlined in the Programming directions under objective CCM 1.4 on nature based solutions with high mitigation potential).

- From the BD FA perspective, the project is aligned with the programming directions Objective one: To improve conservation, sustainable use, and restoration of natural ecosystems, Biodiversity Mainstreaming in priority sectors. To be fully aligned, the project should be adapted and revised to adopt an integrated landscape and seascape approach that permit multiple tools and strategies to respond to drivers of BD loss. Currently project design doesn't clearly demonstrate how it includes the important BD areas, natural or protected in a landscape/seascape approach, designing new land/sea use planification to protect the BD, new management rules and new practices in the areas targeted. Support to projects focused on mainstreaming BD in priority sectors is based on:

- Spatial and land/sea-use planning to ensure that land, freshwater, and marine resource use is appropriately situated to optimize production without undermining or degrading biodiversity.

- Improving and changing production practices to be more biodiversity-positive and to promote sustainable use of biodiversity in agriculture, forestry, fisheries...

- Developing policy and regulatory frameworks that remove subsidies harmful to biodiversity and provide incentives for biodiversity-positive land and resource use.

Please update the project consistently, including the deltas with their status of protected areas in the scope of the project to address the landscape in its full components.

Agency Response

Agency response - 23 April 2026:

The project has been revised to align fully with Biodiversity and Land Degradation focal areas, removing the Climate Change Mitigation (CCM) focus. The design now clearly adopts an integrated landscape and seascape approach across the full extent of the ?ukurova Delta lagoon systems, including protected areas and their buffer zones.

The revised intervention logic strengthens: (i) spatial planning through lagoon management plans covering entire protected areas; (ii) biodiversity-positive practices in fisheries and agriculture (including zoning, sustainable fisheries, and buffer zones); and (iii) policy and governance frameworks to improve management effectiveness and reduce pressures on ecosystems.

These changes ensure full alignment with BD Objective 1 by addressing key drivers of biodiversity loss through coordinated land/sea planning, improved practices, and strengthened institutional frameworks across the targeted lagoon landscapes.

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 comment at CEO Endorsement Request

02/10/2026

Cleared. The project is aligned with NBSAP.

Agency Response

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 comment at CEO Endorsement Request

04/23/2026

Cleared.

02/10/2026

The project plans to create new protected areas, so please add contribution to Target 3.

Agency Response

Agency response - 23 April 2026:

The project's contribution to the Kunming-Montreal Global Biodiversity Framework has been revised to explicitly include Target 3 (30x30), reflecting its support to the expansion and improved management of protected areas within the ?ukurova Delta lagoon systems. The project contributes to this target through strengthening management effectiveness across existing protected areas and supporting the designation and operationalization of additional conservation zones (e.g., fisheries restricted areas and zoning systems), thereby increasing the extent of areas effectively conserved and managed (Paragraph 109).

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared.

Agency Response

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared.

Agency Response

8 Annexes

Annex A: Financing Tables

**8.1 GEF Financing Table and Focal Area Elements: 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 comment at CEO Endorsement Request

04/23/2026

Cleared.

02/10/2026

Not cleared. See comments above on programming of funds: please correct CC star allocation and add LD star.

Agency Response

Agency response - 23 April 2026:

The financing tables have been revised to reflect the updated programming of funds: Climate Change FA has been removed, and resources have been reallocated under Biodiversity and Land Degradation focal areas using full flexibility.

Focal Area allocation?

Secretariat comment at CEO Endorsement Request

Agency Response

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement Request

Agency Response

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response
Focal Area Set Aside?

Secretariat comment at CEO Endorsement Request

Agency Response

8.2 Project Preparation Grant (PPG)

a) Is PPG reimbursement requested and if so, is it within the eligible cap of USD 50,000?

b) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement Request

04/23/2026

a) Cleared.

b) Cleared,

02/10/2026

a)b) Not cleared. Please provide justification for use of the PPG and fill the table.

ANNEX D: STATUS OF UTILIZATION OF PROJECT PREPARATION GRANT (PPG)

Provide detailed funding amount of the PPG activities financing status in the table below:

Project Preparation Activities Implemented	GET/LDCF/SCCF Amount (\$)		Amount Committed
	Budgeted Amount	Amount Spent To date	
Total	0.00	0.00	0.00

Agency Response

Agency response - 23 April 2026:

The PPG table has been filled with the budgetary description.

8.3 Source of Funds

Does the sources of funds table match with the OFP's LOE? Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared.

Agency Response

8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy

and Guidelines? e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared.

Agency Response

Annex B: Endorsements

8.5 a) Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared.

Agency Response

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

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared

Agency Response

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

Secretariat comment at CEO Endorsement Request

08/05/2026

Cleared.

05/05/2026

Not cleared.

05/04/2026

Not cleared.

04/23/2026

Not cleared. The comment has not been addressed. Please **obtain either an email from the OFP accepting this footnote or a new LoE with the footnote.**

02/10/2026

Not cleared. Letter of Endorsement is missing the footnote "Subject to the capacity assessment by the GEF Agency" - please obtain either an email from the OFP accepting this footnote or a new LoE with the footnote.

Agency Response

Agency response - 08 May 2026:

The revised LoE is attached to the package.

Agency response - 01 May 2026:

The LoE signature process is under progress, it should be received shortly.

Agency response - 23 April 2026:

The capacity assessment process has already been completed.

8.6 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project before the PIF submission?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

Annex C: Project Results Framework

8.7 a) Have the GEF core indicators been included?

b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of the budget (too high? Too low?)

c) Are all relevant indicators sex disaggregated?

d) Is the Project Results Framework included in the Project Document pasted in the Template?

Secretariat comment at CEO Endorsement Request

05/08/2026

Cleared.

05/05/2026

Not cleared. Please address the comment consistently with the guidance. The issue is not related to the calculation of the CI it self. But, to assess improved management effectiveness, for CI 2.2, we need you to give targets on the METT. Then, a comparison is done from METT at the beginning and the end of the project, and the hectares (34653 Ha), will be reported if there is a METT score improvement.

05/04/2026

a) Not cleared. Please correct the table: GEF CI 2.2 appears twice in the table. For outcome 2.1, the indicated baseline, mid-term and final target are related to restoration, which is a confusion with CI 3.4. Please remove as it it already reported in Outcome 2.2.

Please also consider revising the reporting consistently with GEF guidelines: GUIDELINES ON THE IMPLEMENTATION OF THE GEF-8 RESULTS MEASUREMENT FRAMEWORKGEF/C.62/Inf.12/Rev.01, <https://www.thegef.org/council-meeting-documents/gef-c-62-inf-12-rev-01>

The main data source for this indicator is the METT score, which is calculated using the GEF-7 BD tracking tool (<https://www.thegef.org/documents/gef-7-biodiversity-protected-area-tracking-tool>). If the score increases over the life of the project, then the protected area hectares should be counted. Any increase in METT score will satisfy the threshold for this indicator. If the METT score does not change or decreases, then the protected area hectares should not be counted. Additional analysis may further characterize increases in METT scores. METT files from projects should be provided to WCMC, which hosts the global database of METTs. For GEF indicator reporting, only the overall METT score is required.

Please provide targets for METT score at mid-term and final stage.

Please see GUIDELINES ON THE IMPLEMENTATION OF THE GEF-8 RESULTS MEASUREMENT FRAMEWORKGEF/C.62/Inf.12/Rev.01

<https://www.thegef.org/council-meeting-documents/gef-c-62-inf-12-rev-01>

June 30, 2022

4/23/2026

a) Not cleared. To be revised when CI will be updated.

c) Cleared.

02/10/2026

a) Not cleared. Please revise when project will be resubmitted.

b) Cleared.

c) Not cleared. Please correct disaggregating the relevant indicators (trainees for ex.)

d) Cleared.

Agency Response

Agency response - 08 May 2026:

The RF has been revised as requested.

Agency response - 01 May 2026:

Please kindly see our explanation of the CI calculations.

Agency response - 23 April 2026:

a & c) Annex C has fully been updated with the revised Outcomes and outputs, accordingly, the indicators have been revised and gender-sensitive indicators have been improved.

Annex E: Project map and coordinates

8.8 Are geo-referenced information and maps provided indicating where the project interventions will take place ?

Secretariat comment at CEO Endorsement Request

04/23/2026

Cleared.

02/10/2026

Not cleared. The current map does not clearly show the areas targeted for improvement of management and practices and those for restoration, in particular in terrestrial zones (agricultural areas for ex.). Please revise.

Agency Response

Agency response - 23 April 2026:

Annex E of the CEO Endorsement Document now includes the revised maps which have been updated to clearly delineate all intervention areas. It also includes spatially explicit information on (i) restoration areas, (ii) zones targeted for improved management and practices, including terrestrial/agricultural buffer zones, and (iii) protected area boundaries across all lagoon systems. Geographic coordinates have been provided accordingly, ensuring full clarity on the location and extent of project interventions.

Annex F: Environmental and Social Safeguards Screen and Rating

8.9 Have safeguard screening document and/or other ESS document(s) attached and been uploaded to the GEF Portal?

Secretariat comment at CEO Endorsement Request

02/10/2026

Cleared.

Agency Response

Annex G: GEF Budget template

8.10 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?

b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?

c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement Request

04/23/2026

a) Cleared.

c) Cleared.

02/06/2026

a) Not cleared.

- By following the GEF Template included in Guidelines, please utilize one single column namely "Responsible Entity" instead of two columns, one for SURKOOP and one for FAO.

FAO Cost Categories	Component 1	Component 2	Component 3	M&E	PMC	Total GEF	SURKOOP	FAO
5013 Consultants								

- For the expenditure category ?5650 Contracts? please use the GEF category ?Contractual Services ? Individual? or ?Contractual Services ? Company? accordingly. Please revise.

- Similarly, please revise the categories ?5024 Expendable procurement? to ?Other Operating Costs.?

- Please revise ?6100 Non-expendable procurement? to ?Goods.?

b) Cleared.

c) Considering that the project is not aligned with CC FA, please update the budget and ToR consistently, removing the Climate change expert.

Agency Response

Agency response - 23 April 2026:

a) The budget table has been revised accordingly: GEF Budget categories have been utilized, and one single "Responsible entity" column is reflected.

c) The budget has been updated in accordance with the changes on the ToC. And the CC expert is now removed from the project, as well as ToRs. Updated ToR and Budget files have been uploaded separately.

Annex H: NGI Relevant Annexes

8.11 a) 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.

b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.

c) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat comment at CEO Endorsement RequestNA

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

05/08/2026

All the comments were addressed. The project is recommended for approval.

05/05/2026

The project is not ready yet. Please address the comments.

05/04/2026

The project is not ready yet. Please address the comments.

04/24/2026

The project is not ready yet. Please address the comments.

02/10/2026

The project is not ready yet. Please address the comments and revise consistently before resubmission

9.2 Additional Comments to be considered by the Agency during the inception and implementation phase

Secretariat comment at CEO Endorsement Request

9.3 Review Dates

	1SMSP CEO Approval Response to Secretariat comments	
First Review	2/24/2026	4/23/2026
Additional Review (as necessary)	4/24/2026	5/1/2026
Additional Review (as necessary)	5/5/2026	5/8/2026
Additional Review (as necessary)	5/8/2026	
Additional Review (as necessary)	5/13/2026	