

Building institutional and local capacities to reduce wildlife crime and to enhance protection of iconic wildlife in Malaysia

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

10597

Countries

Malaysia

Project Name

Building institutional and local capacities to reduce wildlife crime and to enhance protection of iconic wildlife in Malaysia

Agencies

UNDP

Date received by PM

3/18/2022

Review completed by PM

7/22/2022

Program Manager

Hannah Fairbank

Focal Area

Biodiversity

Project Type

FSP

PIF
CEO Endorsement

Part I ? Project Information

Focal area elements

1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?

Secretariat Comment at CEO Endorsement Request

July 29, 2022 HF:

On Gender: It is well noted that the project has carried out a relevant gender analysis and that it has incorporated gender considerations across the different project components. It seems that the Agency overlooked to complete the gender tags. Please complete these, indicating which gender results areas they expect to contribute towards.

July 22, 2022 HF:

Comments cleared.

June 18, 2022 HF:

- 1.) In the Taxonomy section, please indicate which Gender Results Areas the project will contribute to.
- 2.) Please make the project duration and the project start and end dates consistent. Please either correct the project duration (it currently reads 60 months whereas the start and end dates indicate 72-month project duration), or correct the project start/end dates.

April 6, 2022 HF:
Yes.

Agency Response

UNDP 15 July 2022

1) The selected Gender Results Areas in the Taxonomy Section have been highlighted in green for clarity.

2) The reference to the project period in the ProDoc is in the cover page, and in the CER document is in the UNDP Risk Register, Risk 8 on p90. This has been changed to 72 months as requested. This same entry has been changed in Annex 5 of the ProDoc.

Project description summary

2. Is the project structure/design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?

Secretariat Comment at CEO Endorsement Request

June 22, 2022 HF:

All comments cleared.

April 6, 2022 HF:

1.) Please remove the detail/references to the GWP components from the project Components in Table B.

Outcome 1:

2.) 1.1.1 Unclear why the ESIA/SESA is being conducted under this project Component 1? As this seems to be environmental safeguard work/assessment and as such this should be through the project's PMC and not within project activity funds. Please clarify/revise.

3.) 1.1.2 Please further clarify the relationship between the "MYTTF", the "national level coordination platform" and "MyWEN" as they seem to have potentially overlapping functions/roles.

4.) Output 2.3: for those activities for which GEF won't be supporting through this project, please either: a.) Redact them entirely; or b.) Specify that **GEF resources will not support this activity.**

5.) Several activities 3.2.1/4.3.1 seem to include activities that are essential elements of the implementation of social safeguards for the project, which should be funded through PMC rather than project funds for components/activities. Please revise.

6.) Component 5 was added to the project during PPG, when in fact these activities should not fall within the scope of the project components, when instead they should be planned and budgeted for under Project Management Costs (PMC). Please see Pg 49 of: [Guidelines on the GEF Project and Program Cycle Policy](#) GEF/C.59/Inf.03 July 20, 2020. Please redact Component 5, re-budget and revise, ensuring that M&E activities are included in a separate table with budget figures included.

Agency Response

We wish to clarify that the approach towards ensuring that UNDP and GEF Social and Environmental Safeguard (SES) Standards are met in this project design is the same as used for all previously approved GEF project submissions, namely, to integrate the safeguard risk management measures into the technical components. There is no requirement under GEF policy to cover the cost of SES work (assessments and management plans) under PMC, which would be inconsistent with the SES policy and with UNDP's approach of integrating SES requirements into project design (for efficiency, effectiveness, co-benefits, etc.). The GEF project cycle guidelines do not list safeguards work in the list of execution functions eligible for funding by the GEF portion of PMC (p53) and also say (p17): *While the M&E budget can be charged for the monitoring and evaluation of the project performance, Environmental and Social Safeguards (ESS), Gender action plan and Stakeholder engagement plan, the Project Preparation Grant or project funds should cover the design; with project funds used for the implementation of ESS, gender and stakeholder engagement requirements.* [original emphasis]

KeTSA, as the IP for this project, provided the following clarification:

There is an ongoing regional effort to coordinate the implementation of CITES through the ASEAN Expert Group On CITES. To strengthen the implementation of CITES regionally, another mechanism was created, i.e. the ASEAN Wildlife Enforcement Network (ASEAN-WEN). Recently, these two groupings have now been combined under the ASEAN Working Group on CITES and Wildlife Enforcement (AWG CITES and WE).

To coordinate and cooperate with the regional group, Malaysia formed the Malaysia Wildlife Enforcement Network (MY-WEN) in 2009 to strengthen

cooperation among law enforcement agencies at federal and state levels throughout the country in the management, law enforcement and legal trade of fauna and flora. According to its TOR, the MY-WEN committee meets once a year and is chaired by the Deputy Secretary General of KeTSA. MY-WEN can be considered a high-level implementation task force that focuses on coordinated enforcement to ensure that legal trade of endangered flora and fauna takes place in accordance with CITES from the customs entry points to the market place.

On the other hand, MyTTF is a newly established high-level policy and decision-making body mainly related to the conservation of the Malayan tiger. Its role and relationships with other bodies are still evolving. At the inaugural MyTTF meeting chaired by the Honorable Prime Minister in January 2022, two other Committees were also formed: MyTTF Implementation Committee chaired by the Honorable Minister of KeTSA and the MyTTF Technical Committee chaired by the Director General of DWNP.

Therefore, MyTTF and MY-WEN will complement each other. Since both come under the purview of KeTSA, the functions of MyTTF and MY-WEN will be further streamlined to minimize overlap and to strengthen their complementary roles.

Changes have been made to Output 1.1 in CER p40-41 and ProDoc p42.

Output 2.3 activities have been revised as requested, by specifying which activities will not be supported by GEF resources.

Changes have been made to Output 2.3 in CER p52 and ProDoc p53-54

Please see the response to item 2.) above.

6). The M&E activities and the corresponding budget have already been included in ProDoc Section VI M&E Plan, as well as CER *Section 9) Monitoring and Evaluation*.

Kindly note that the updated UNDP ProDoc template specifies that M&E must be presented as a separate component. This is to emphasise the importance of M&E in achieving and communicating results, to align the M&E system with results-based management and to promote evaluative knowledge and learning around results. This is common practice, as proven by the many UNDP supported projects that have been endorsed with M&E included under their technical components. ???

In addition to the above, please note that the suggestion to include M&E under PMC seems to contradict the GEF project cycle guidelines, which clearly state that *monitoring of project indicators and periodic monitoring report are ineligible for GEF Funding under PMCs* (see Table C of the GEF Project Cycle Guidelines, Pg 53).

We therefore propose that no change is made with respect to this item, consistent with our previous GEF submissions.

3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Co-financing

4. Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat Comment at CEO Endorsement Request

July 22, 2022 HF:

Comments cleared.

June 28, 2022 HF:

Please make the following changes to designation of co-financing:

? Sabah Wildlife dept \$3,293,000: change ?Recurrent expenditures? to ?Investment mobilized?

? Sabah Wildlife dept \$3,097,000: change ?Investment mobilized? to ?Recurrent expenditures?

? Pelindung Alam Malaysia \$3.5M: change ?Recurrent expenditures? to ?Investment mobilized?

June 22, 2022 HF:

Comment cleared.

Please note: For future submissions, there is a function in the portal to make each of the co-finance letters available via a link in the "evidence" column of Table C (see below) which has not been done for the co-finance letters for this project that are present in the document tab.

C. Sources of Co-financing for the Project by name and by type

Sources of Co-financing	Name of Co-financier	Type of Co-financing	Investment Mobilized	Amount(\$)	Evidence
Recipient Country Government	Ministry of Energy and Natural Resources	In-kind	Recurrent expenditures	24,500,000.00	
Recipient Country Government	Ministry of Energy and Natural Resources	Public Investment	Investment mobilized	25,000,000.00	
Recipient Country Government	Sabah Wildlife Department	Public Investment	Recurrent expenditures	3,293,000.00	
Recipient Country Government	Sabah Wildlife Department	In-kind	Investment mobilized	3,097,000.00	
Recipient Country Government	Sarawak Forestry Corporation	In-kind	Recurrent expenditures	1,450,000.00	

April 6, 2022 HF:

- 1.) Please ensure that co-finance letters are linked to Table C in the CER.

Agency Response

UNDP 15 July 2022

Designation of co-financing for Sabah Wildlife Department and Pelindung Alam Malaysia has been adjusted in the CER and ProDoc as requested.

?UNDP 05/19/2022

- 1) Thanks for the suggestion. Co-finance letters correspond to the information provided in Table C of the CER. No changes are needed.

GEF Resource Availability

5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?

Secretariat Comment at CEO Endorsement Request April 6, 2022 HF:

Yes.

Agency Response

Project Preparation Grant

6. Is the status and utilization of the PPG reported in Annex C in the document?

Secretariat Comment at CEO Endorsement Request

July 22, 2022 HF:

Comment cleared.

June 18, 2022 HF:

PPG expenditure/committed: Please provide a breakdown of the activities budgeted, spent, and committed during PPG. Although it's clear that only \$69,724.87 were spent and \$130,275.13 are committed, the expenditure categories for budgeted, expended vs committed should be provided.

April 6, 2022 HF:

Yes.

Agency Response

UNDP 15 July 2022

As requested, breakdown of budget lines is now provided in Annex C of the CER, also figures have been updated as of 15 July 2022.

Core indicators

**7. Are there changes/adjustments made in the core indicator targets indicated in Table E?
Do they remain realistic?**

Secretariat Comment at CEO Endorsement Request

July 22, 2022 HF:

Comment cleared.

June 22, 2022 HF:

1.) Comments cleared.

2.) Comment partially addressed. Please include this response and clarification in the Portal itself-indicator section-(rather than just the review sheet and document attachments) to ensure consistency throughout.

April 6, 2022 HF:

1. In the core indicator section of the Portal entry, the Anticipated start year of accounting should be 2022 or 2023 (and not 2042) and the Duration of

accounting is missing. Please complete and correct.

2. The overall result of ~3 Mt CO₂e is reasonable but it is not clear where the areas used in EX-ACT tool come from (691 ha, 240,793 ha, 6,000 ha?). We couldn't see them in the Prodoc nor in the CEO ER. The areas to be considered in the EX-ACT tool (where the forest degradation is reduced due to improved management) need to be clarified in the Portal entry, either in the alternative scenario if the areas benefit from different activities/outputs or at least under the Global Environmental Benefits section. This includes explaining how the Agency get these numbers of hectares and what activities will be implemented on these areas.

Agency Response

UNDP 15 July 2022

Clarification has been provided in the indicator section of the portal

UNDP 05/19/2022

1. The core indicator section of Portal entry has been corrected as requested.
2. We note that the areas referred to are stated in Worksheet 5 / Section 5.1 on Forest Degradation and Management of the EX-ACT Workbook (Annex 12a of the ProDoc). The aggregate climate co-benefits all relate to the 902,484 ha (GEF Core Indicator 1) of terrestrial protected areas covered by the project. Specifically, the climate co-benefit is derived from carbon sequestered and emissions avoided (GEF Core Indicator 6.1) by the healthier forest stands resulting from improved management effectiveness of these protected areas. This is mentioned in the CER as: "The improved security of the project's targeted protected areas (mainly primary tropical rainforest) as a result of the project interventions will reduce the incidence of encroachment and forest degradation, resulting in carbon sequestration and avoided deforestation benefits totaling 3,004,688 tCO₂-eq. The area breakdown in EX-ACT Worksheet 5 refers to the varying states of forest conditions within these PAs, which have been based on the PPG consultations and will be reconfirmed during implementation using GIS and remote sensing data analysis. The varying climate co-benefits are due to the forest stands' initial states and expected natural regeneration / recovery during the total accounting period of 20 years. There are no specific intervention treatments intended for these different states of forest condition under this project beyond ensuring their continued protection from encroachment, therefore this is covered in the alternative scenario through references to improved management effectiveness of the targeted protected areas, which will be reflected in Core Indicator 1 and the project Results Framework in CER Annex A.

Part II ? Project Justification

1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

Secretariat Comment at CEO Endorsement Request

April 6, 2022 HF:

Yes.

Agency Response

2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:

Comment cleared.

April 6, 2022 HF:

Please include a brief baseline scenario statement in section "2) the baseline scenario and any associated baseline projects" of the CER. Currently this section doesn't actually address the baseline scenario but instead starts with discussion of public agencies.

Agency Response

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UNDP 05/19/2022

The baseline scenario section 2) of the CER has been elaborated as requested, based on material in Prodoc Annex 26.

3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?

Secretariat Comment at PIF/Work Program Inclusion

April 6, 2022 HF:
Yes.

Agency Response

4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?

Secretariat Comment at CEO Endorsement Request

April 6, 2022 HF:
Yes.

Agency Response

5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:
Comment cleared.

April 6, 2022 HF:

1.) Please clearly state the incremental/additional cost reasoning for this project in the CER.

Agency Response

UNDP 05/19/2022

The incremental cost reasoning has been elaborated in the CER as requested ? see section 5) incremental/additional cost reasoning (p61-65)

6. Is there further and better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:
Comment cleared.

April 6, 2022 HF:

1.) Please revise the GEBs section to clearly state and then elaborate the global environmental benefits for biodiversity of this project (would not include institutional capacity changes etc).

Agency Response

UNDP 05/19/2022

The GEBs section of the CER (p61-65) has been elaborated as requested. See also Prodoc Strategy Section p31-32.

7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?

Secretariat Comment at CEO Endorsement Request

April 6, 2022 HF:

Yes.

Agency Response

Project Map and Coordinates

Is there an accurate and confirmed geo-referenced information where the project intervention will take place?

Secretariat Comment at CEO Endorsement Request

April 6, 2022 HF:

Yes.

Agency Response

Child Project

If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?

Secretariat Comment at CEO Endorsement Request

April 6, 2022 HF:

Yes.

Agency Response

Stakeholders

**Does the project include detailed report on stakeholders engaged during the design phase?
Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?**

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:

Comment cleared.

April 6, 2022 HF:

1.) Annex 7-Stakeholder Engagement Plan should elaborate an actual plan for engagement, including means of engagement, timing etc. Currently it is challenging to follow what is exactly planned in terms of stakeholder engagement once this project is endorsed. This is particularly essential given the low level of engagement with members of IPLCs in project sites, the need for robust FPIC and the nature of the project activities. Please provide further clarification/detail/elaboration of concrete plans for this in the CER and Annex 7.

Agency Response

UNDP 05/19/2022

1.) An additional table has been included in the Stakeholder Engagement Plan in **Annex 7** stating the means of engagement, timing, responsibilities and location for the relevant stakeholder groups according to project Output, as requested. The table is detailed and lengthy, therefore it has not been pasted into the CER, but it is referred to. Pre-commencement requirements for activities specified in the ESMF (**Annex 8**) involving SESA, ESIA and FPIC have been listed, and the ESMF (**Annex 8**) has been elaborated with additional tables spelling out these requirements.

Gender Equality and Women's Empowerment

Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities? If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:

Comment cleared.

April 6, 2022 HF:

1.) As a result of the powerful findings of the gender analysis, please further describe/highlight measures that will be taken to ensure that IWT enforcement activities in particular-take a human rights-based approach-including to gender mainstreaming/sensitivity/protection/empowerment for women generally and indigenous women specifically.

Agency Response

UNDP 05/19/2022

1.) The Gender Action Plan (**Annex 9**) aims to address the risks identified in the Gender Analysis. The Action Plan specifies a position within KeTSA for a **Gender and Community Safeguard Officer** (who will be the project's lead Gender Focal Point). This position will play a lead role in creating the coordinating structure across the project sites and dealing with state lead agencies and enforcement partners. The responsibility at the State level lead agency (DWNP, SFC, SWD) is the **Gender and Community Safeguard Focal Person**. While the responsible persons at the community level are the **Community Gender and Safeguard focal persons**. The aim for having this embedded structurally is to provide a systematic approach for guidance and ensure early detection of risk before it escalates.

The Gender and Community Safeguard Officer will work with subcontracted consultants to produce a training module based on *a human rights-based approach to wildlife law enforcement - including gender mainstreaming / sensitivity / protection / empowerment for women generally and indigenous women specifically* (see Activities 1.2.2, 2.1.3 and budget notes 5D, 5E, 12B).?The training module will be a compulsory handbook/online course for the relevant enforcement officers, at both central and site levels. The Gender and Community Safeguard Officer will also assist project partners to comply with the FPIC requirements in the ESMF (Prodoc **Annex 8**).

The project will identify **Gender and Community Safeguard Focal Persons** in the lead agencies for each Component and in the project landscapes. For example, there will be one focal person in the project site in the SFC and one focal person in the Sarawak project landscape; one focal person in the Sabah Wildlife Department (SWD) and one focal person in the Sabah project landscape; one focal person in DWNP and one in each of the three tiger landscape sites in the Peninsula. Their role is to ensure that staff involved in the various enforcement-related activities in the project have received prior training on gender and indigenous rights, and to conduct regular briefings, liaison and spot-checks with communities in the project sites to identify any risks. The information

from these activities should be reported regularly to the Gender and Community Safeguard Officer.

Furthermore, the **Gender and Community Safeguards Officer** is responsible for ensuring that indigenous and local communities in the project sites have access to a fair and anonymous grievance redress mechanism (see **Annex 8 ESMF** - section 6.2 for details).

Finally, these gender specialists will regularly receive trainings on safeguards and gender, they will also have access to the multiple safeguards and gender tools as well as to the knowledge and advisory networks available in UNDP and in the GWP Coordination Program / the World Bank.

Private Sector Engagement

If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?

Secretariat Comment at CEO Endorsement Request
April 6, 2022 HF:

Yes.

Agency Response **Risks to Achieving Project Objectives**

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

Secretariat Comment at CEO Endorsement Request
June 23, 2022 HF:
All comments cleared.

April 6, 2022 HF:

Social and Environmental Safeguards & Risks:

- 1.) Is Risk 11 'moderate' as the text seems to state, or 'low' as the table depicts? Please make consistent.
- 2.) It is unclear why several of the risks were deemed as 'moderate' risks versus substantial. Including: Enforcement personnel, community forest guards and informers may face occupational safety and health risks during the course of enacting their duties; and Existing conflicts related to land use and/or ownership could be exacerbated or reignited by project. Given the planned activities/scope of the project, why aren't these considered substantial project risks?
- 3.) Ensure that local communities are fully engaged-meeting FPIC standards- **prior to any project activities start in each area on a ?GO/NO-GO? basis.** Please include clearly in CER, ProDoc and related annexes.
 - 3.) **Include local social and gender specialists in the project team,** and **ensure presence on the ground and establishment of a direct line of communication with the indigenous and non-indigenous communities.** Please include in CER, ProDoc and project budget accordingly.
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 - 4.) **Enforcement units should also include gender and indigenous cultural sensitized members** to improve communication and flag potentially risky situations before they escalate. Please include in CER, ProDoc and project budget accordingly.

Agency Response

UNDP 05/19/2022

1.)The text of the Risk Register for SESP Risk 11 has been corrected to indicate a Low risk, consistent with the table rating. This was also adjusted in ProDoc Annex 5.

2.) Individual risk ratings of Low, Moderate, Substantial or High, are established through application of an impact matrix which combines a risk's significance with its probability. "Significance" is rated on a scale of 1 - 5, according to defined criteria relating to such things as the number of people likely to be affected, the spatial extent of the impact, its likely duration, reversibility, etc. The probability of a risk is similarly rated 1 - 5, again according to pre- defined criteria. The methodology can perhaps appear rigid and formulaic, but is used to ensure consistency and to avoid, as far as possible, subjective judgements. Please refer to pages 16-17 of UNDP's SES toolkit:https://info.undp.org/sites/bpps/SES_Toolkit/SES%20Document%20Library/Uploaded%20October%202016/UNDP%20SESP_2019%20UPDATE_Rev%20April%202022.pdf

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The two risks cited are both rated as having Impacts of 3, and Probabilities of 2, producing an overall rating of Moderate. Impact level 3 is defined as being "Intermediate" i.e. "medium magnitude, limited in scale and duration". The risks were judged not to meet the criteria required for the second-highest Impact rating of 4, which is "Extensive" and "of considerable magnitude, spatial extent and duration", or 5, which is "Extreme". The probability rating of 2 refers to impacts that are of "low likelihood". Higher likelihood ratings are: 3 = Moderately Likely; 4 = Very Likely, and 5 = Expected. Given the Impact rating of 3, the highest likelihood rating of 5 (ie. near-certainty) would be required for the Impact x Probability to produce a risk rating of "Substantial". Near-certainty is not envisaged.

It is important to note that the project's overall SES risk rating is taken from the highest-rated single impact. The project as a whole is rated as **Substantial**, and it is that rating that determines the level and extent of impact mitigation. The overall rating of Substantial dictates that the project will benefit from further screening, Strategic Environmental and Social Assessment, and Environmental Impact Assessments, in addition to further stakeholder engagement and the development of Indigenous Peoples Plans. The assessments will include further review of the SESP, and risk levels and impact mitigation approaches can be adjusted where required.

3.) The Environmental and Social Management Framework for the project (ProDoc **Annex 8**) has been revised with the provision of additional tables (Tables 4, 5 & 7) which list all project activities that have pre-commencement requirement(s) for SESA, ESIA and FPIC. The lists of activities are provisional in that they may be added to during the Assessment and FPIC processes. These tables have been used to inform reference to these requirements in the CER Sections on GEF Alternative Strategy, and Stakeholder Engagement; and Prodoc sections on Results and the Stakeholder Engagement Plan (Prodoc **Annex 7**).

4.) As mentioned in the response above (on gender-related risks), the proposed structure for ensuring the protection of women and sensitization to indigenous cultures will embed a Gender and Community Safeguard Officer within the lead agency (KeTSA) as well as have Gender and Community Safeguard Focal Persons in each of the Component lead agencies (DWNP, SFC, SWD) and on site. Their role is to ensure that enforcement personnel are trained in sensitization to both gender and indigenous rights

and to maintain direct lines of communication with the Gender and Community Safeguard Officer, Community Focal Points and other community members in the project landscapes. The project also aims to increase women and indigenous participation as part of mainstreaming.

Currently in Malaysia there are no such dedicated or trained personnel within the government agencies that specialize in gender and indigenous sensitization related issues. Therefore, this project will contribute towards strengthening agency capacity to deal with these issues in line with the UNDRIP Human-Rights framework and in a professional manner. To ensure that suitable personnel are identified, we recommend that a selection committee is set up by UNDP and KeTSA including established gender and indigenous national experts to interview and hire the Gender and Community Safeguard Officer. There are women officers and rangers which include members of the indigenous communities. Such suitable candidates within the participating agencies should be considered for the Gender and Community Safeguard Focal Persons roles in law enforcement.

This has been reflected in the gender mainstreaming section, social and environmental risks section, and gender analysis and action plan (**Annex 9**).

5.) KeTSA has provided the following comment on gender and cultural sensitization in wildlife law enforcement: KeTSA appreciates and recognizes the importance of law enforcement agencies being sensitive to gender and indigenous and local community issues. Within the agencies, DWNP has several women officers and rangers, including rangers from the Orang Asli community. PSPC and JNPC have also undertaken similar efforts. Since 2019, KeTSA through DWNP has hired several hundred Orang Asli under the VETOA (Veterans and Orang Asli) to assist the law enforcement agencies in undertaking patrolling especially at priority tiger habitats. KeTSA will make efforts to increase the number of women in law enforcement. KeTSA hopes the project can support various capacity building activities to sensitize law enforcement staff regarding this matter, including provision of specific courses probably through IBD of DWNP.

Further to KeTSA's comment, the project has incorporated the following systematic measures for building capacity for gender and indigenous cultural sensitization and safeguarding within the relevant agencies and communities (as described above):

Gender and Community Safeguard Focal Persons in the lead agencies, in the field LE teams, and in relevant communities in the project landscapes

a national project position (**M&E, Gender and Safeguards Officer**) that will oversee the appointment, training and coordination of these focal persons

Gender and Community Safeguard Focal Persons from the communities based in the project landscapes, together with the **Gender and Community Safeguard Focal Persons** based at the respective State lead agencies (DWNP, SWD, SFC) will be put in place to monitor the presence and role of the enforcement units with respect to gender and indigenous cultural issues. Additionally, the project-related wildlife law enforcement units will have to undergo regular gender and indigenous cultural sensitization training. Also, the enforcement units will work closely with the **Community Gender and Safeguards Focal Persons** in the communities to generate awareness of the module on gender and indigenous cultural sensitization as well as to regularly organize activities in the villages on conservation laws. We envisage the enforcement units playing a larger role in developing rapport with related communities through engaging in community development projects, education and promotion of conservation, rather than solely being engaged in anti-poaching activities. With the communities, the aim is to take an inclusive approach - looking at enforcement personnel and members of the community as collaborators against poaching. In this respect, we will highlight gender sensitization to ensure women in the project sites are not made vulnerable and that the enforcement units are seen to carry out their duties with the utmost concern for professional conduct at all times.

The project will also identify a person in each of the enforcement units at each of the project sites who can be the Field Liaison with the **Community Gender and Safeguards Focal Persons** in the communities, to facilitate changes in awareness and organizational culture within these enforcement units.

In this way, the project will fully utilise the national **Gender and Community Safeguards Officer's** expertise in developing organizational capacity in mainstreaming gender and indigenous/community sensitization within the participating agencies in wildlife protection law enforcement. This may pave the way towards the acceptance of such an office as the norm in KeTSA, DWNP, SWD, SFC and other related enforcement agencies.

In line with the above approach, **Gender and Community Safeguard Focal Points** will be identified in the related agencies at central and project landscape levels, under the overall guidance of the **Gender and Community Safeguards Officer** based in KeTSA. These agency focal points will also work with the **Community Gender and Safeguards Focal Persons** in each Project Landscape.

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The key person leading the change is the **Gender and Community Safeguards Officer** at KeTSA. The main documents and structure she or he design will be aimed at continuously exposing members of the enforcement units to a human rights-based approach, and to ensure compliance, an independent grievance redress mechanism with an open-door policy will be established (see **Annex 8 ESMF** for details).

Gender and Community Specialist	Agency/Landscapes	Funded by	Notes	Job Description
Main Specialist	KeTSA	Project	Identified and hired by UNDP and KeTSA	Develop guideline for the project to implement the gender and community specialist role through the respective agencies, Civil Society and communities.
Agency Focal Person	SFC SWD DWNP	SFC SWD DWNP	Identified and assigned by UNDP and respective agencies	Job description will be formulated with guidance from the main specialist.

Field Enforcement Unit Focal Persons	DWNP, SFC, SWD, other agencies as appropriate	Respective Agencies	Identified and assigned by Agency Focal Points	Job description will be formulated with guidance from the main specialist.
Community Focal Persons	Belum-Temengor Endau-Rompin Taman Negara SSL Greater Maliau Basin	Project	Identify from local community. Where possible women members from the community will be hired as the gender and community focal person.	Job description will be formulated with guidance from the main specialist.

Finally, these gender specialists will regularly receive trainings on safeguards and gender, they will also have access to the multiple safeguards and gender tools as well as to the knowledge and advisory networks available in UNDP and in the GWP Coordination Program / the World Bank.

This has been reflected in the social and environmental risks section, and GEF Alternative for Outputs 1.2, 2.1, 3.1 and 4.1 (See CER pages 44-45, 48-49, 53, 56 and UNDOP ProDoc Paragraphs 95, 109, 117 and 125).

Coordination

Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:

Comment cleared

April 6, 2022 HF:

1.) Table 5 is helpful, and it outlines 'intersections' of the current project and other project investments/NGO initiatives. It is notable the number of activities/amount of investment by other projects in Component 1 in policy/coordination etc. What is unclear though, is how this project will contribute and coordinate, without being duplicative with the ongoing efforts. Please address the question overall in this section, and within the coordination with other initiatives. Please actually describe what coordination is envisioned/planned.

Agency Response

UNDP 05/19/2022

1.)KeTSA has provided the following clarification: KeTSA would like to suggest the coordination with various projects be undertaken at Project Component level through the respective Project Technical Committees that will meet frequently. If needed, such matters can also be brought to the Project Steering Committees including the State PSCs for Sabah and Sarawak. KeTSA will recommend that a permanent agenda be created to ensure better coordination among related initiatives.

Accordingly, the Project Component Technical Committees will provide the mechanism for coordination between related initiatives including government-NGO coordination, in addition to the PSC, State Steering Committees for Sabah and Sarawak, UNDP CO and KeTSA. Prodoc **Annex 23** - Terms of Reference for Component-level Technical Committees states: "The purpose of these component-level Technical Committees will be to enable coordination, engagement and consultation with the diverse government and civil society stakeholders and technical experts in order that the planning and implementation of activities is well aligned with government and CSO programmes, is well informed by the relevant technical expertise, and that opportunities for synergy and knowledge exchange are realized".

See CER Institutional Arrangements section / Prodoc Section VII on Governance and Management Arrangements; and ProDoc **Annex 23**.

Consistency with National Priorities

Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:

Comments cleared.

April 6, 2022 HF:

- 1.) Please edit this given COP-15 dates remain outstanding: "Alignment with CBD Post-2020 Biodiversity Framework targets will be confirmed after these targets have been finalized and approved in May 2022"
- 2.) Please revise this section to clarify that: the GEF is not the financial mechanism for CITES, although complementary project activities may contribute to meeting CITES commitments in alignment with the GEF-7 strategy. Please revise/rework project activities accordingly.

Agency Response

UNDP 05/19/2022

?1.)The requested edit has been made to the CER section on Consistency with National Priorities (See Page 10); and Prodoc section on the same (See Paragraph 50).

2.)The requested clarification has been made to the CER section on Consistency with National Priorities (See Page 123); and Prodoc section on the same (See Paragraph 51).

Knowledge Management

Is the proposed ?Knowledge Management Approach? for the project adequately elaborated with a timeline and a set of deliverables?

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:

Comment cleared.

April 6, 2022 HF:

1.) Given the real risk of HWC, include in the KM plan that the project/project staff will join and participate in the GWP Human Wildlife Conflict (HWC) community of practice to take advantage of the practical knowledge sharing in this area.

Agency Response

UNDP 05/19/2022

1.)Project involvement in the GWP Human Wildlife Conflict (HWC) community of practice?has been added to the KM section (See UNDP ProDoc Paragraph 102 and CER pages 63 an 124-125 for details).

Monitoring and Evaluation

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

Secretariat Comment at CEO Endorsement Request

July 22, 2022 HF:

Comment cleared.

June 28, 2022 HF:

M&E and safeguards officer has been charged across the project Components and M&E budget. Please revise to charge M&E related expenses to the M&E portion of the budget only.

June 23, 2022 HF:

Comment cleared.

April 6, 2022 HF:

Yes, though please see previous comment regarding Component 5 and required changes.

Agency Response

UNDP 15 July 2022

The M&E and Safeguards Officer inputs to Components 1-4 now consist solely of safeguards related activities. The fee rate and time inputs have been adjusted and all M&E inputs are now provided in Component 5 on Monitoring and Evaluation as requested. See revisions to the Total Budget and Workplan, Budget Notes, and Prodoc Annex 6 on Technical Consultancies.

Benefits

Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

April 6, 2022 HF:

Yes

Agency Response

Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request

July 22, 2022 HF:

Comment cleared.

June 28, 2022 HF:

1.) Budget: The total for component 2 in the budget table, in Annex E, and in table B do not match. Please review and correct.

June 23, 2022 HF:

Comments cleared. PM has reviewed and approves of limited vehicle purchase.

April 6, 2022 HF:

1.) Please include the project GEF budget in the ProDOc and as an annex for review. Currently reads "To be provided by MPSU after TBWP clearance."

2.) Please ensure any proposed vehicle purchase is clearly included in the budget, and clear/strong justification is included for GEFSEC review.

Agency Response

UNDP 05/19/2022

This has been included in the resubmission package as requested.

2.) There is only one vehicle procurement planned for the entire project (see Budget Note 32: 4 motorbikes (4 x \$5,000) in support of patrolling and banteng monitoring across large remote landscape = \$20,000 (Outputs 4.1, 4.2).

This procurement is essential to enable patrolling and banteng monitoring activities supported by the project across the large and remote landscape of Greater Maliau Basin, which is far from any population centres, and access is often only possible along small rough tracks. Existing transportation supporting the baseline patrolling activities consists of:

Sabah Wildlife Department (SWD) Tawau office: 2 units double cab; SWD HQ in Kota Kinabalu: can assist with 1 double cab on a case by case basis. However, for enforcement SWD has only 1 double cab, which is occasionally used for patrolling but it cannot access many small roads, therefore enforcement carried out by SWD was mostly conducting road blocks at strategic points. MBCA under Sabah Foundation has only 2 Twin cabs (over 10 years old) that are used for management of PA, not dedicated for patrolling activities. Sabah Forest Department's PROTECT team has 2 vehicles (double cab) on standby for deployment and patrolling in the project site area.

Accordingly, the proposed 4 motorbikes will be extremely useful to enhance patrolling and law enforcement across this vast landscape, especially along the many small tracks that are only accessible by motorbikes.?

Project Results Framework

Secretariat Comment at CEO Endorsement Request Clear

Agency Response

UNDP 15 July 2022

The total for component 2 in the budget table, in Annex E, and in table B now matched in the portal.

GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request Clear

Agency Response

Council comments

Secretariat Comment at CEO Endorsement Request

July 22, 2022 HF:

Comment cleared.

June 23, 2022 HF:

Comment cleared. Please redact comment from India and Agency response as it is not relevant to this project.

April 6, 2022 HF:

Please include council member country with each comment and response.

Agency Response

UNDP 15 July 2022

India comment and Agency response have been redacted.

UNDP 05/19/2022

GEF Council comments have been identified by country and responses to further GEF Council comments included in the CER (See **Annex B** of the CER for details).?

STAP comments

Secretariat Comment at CEO Endorsement Request

June 23, 2022 HF:

Comment cleared.

April 6, 2022 HF:

Please include and respond to STAP comments relevant to this Child Project.

Agency Response

UNDP 05/19/2022

Responses to relevant STAP comments on the GWP II Program have been incorporated in the CER (See **Annex B** of the CER for details).

Convention Secretariat comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Other Agencies comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response

CSOs comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Status of PPG utilization

Secretariat Comment at CEO Endorsement Request Clear

Agency Response

Project maps and coordinates

Secretariat Comment at CEO Endorsement Request Clear

Agency Response

Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)

Secretariat Comment at CEO Endorsement Request

NA

Agency Response

Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)

Secretariat Comment at CEO Endorsement Request NA

Agency Response

UNDP 05/19/2022

IMPORTANT ADDITIONAL INFORMATION

In addition to the GEF Review comments, feedback was provided by a range of Malaysian government agencies that arrived after submission to GEF Secretariat. The comments received from government agencies and the UNDP PPG team's responses to these comments are detailed in the attached **Annex** to this Review Sheet. Revisions made to the documents in response to government feedback are shown in light blue highlights (versus the yellow highlights used for revisions relating to GEF comments). Care was taken to avoid substantive changes that might impact indicator targets, safeguards, etc.

GEFSEC DECISION

RECOMMENDATION

Is CEO endorsement recommended? (applies only to projects and child projects)

Secretariat Comment at CEO Endorsement Request

July 29, 2022 HF:

Please address last remaining issue regarding the "gender tags" referenced and highlighted above.

July 22, 2022 HF:

Yes. PM recommends CEO endorsement of this project.

June 28, 2022 HF:

No, please address the remaining comments in yellow highlights in the review sheet. In addition, prior to re-submission, please remove all highlights in project documentation for Council review.

June 23, 2022 HF:

Yes. PM recommends CEO endorsement of this project.

April 6, 2022 HF:

No, not at this time. Please address the comments, revise and resubmit. Please keep in mind that the second cancellation date for this project is June, 2022. Given it must be technically recommended and then go for Council 4-week review prior to endorsement, timing is getting tight.

Review Dates

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
First Review	4/6/2022	
Additional Review (as necessary)	6/28/2022	
Additional Review (as necessary)	7/22/2022	
Additional Review (as necessary)	7/29/2022	
Additional Review (as necessary)		

CEO Recommendation

Brief reasoning for CEO Recommendations