



## **Biodiversity protection through the Effective Management of the National Network of Protected Areas**

### **Part I: Project Information**

**GEF ID**

10351

**Project Type**

FSP

**Type of Trust Fund**

GET

**CBIT/NGI**

CBIT **No**

NGI **No**

**Project Title**

Biodiversity protection through the Effective Management of the National Network of Protected Areas

**Countries**

Comoros

**Agency(ies)**

UNDP

**Other Executing Partner(s)**

Ministry of Environment, Agriculture and Fisheries (MEAF)

**Executing Partner Type**

Government

**GEF Focal Area**

Biodiversity

**Taxonomy**

Focal Areas, Biodiversity, Protected Areas and Landscapes, Terrestrial Protected Areas, Community Based Natural Resource Mngt, Coastal and Marine Protected Areas, Species, Threatened Species, Financial and Accounting, Payment for Ecosystem Services, Conservation Trust Funds, Conservation Finance, Natural Capital Assessment and Accounting, Biomes, Mangroves, Tropical Rain Forests, Coral Reefs, Sea Grasses, Influencing models, Convene multi-stakeholder alliances, Strengthen institutional capacity and decision-making, Deploy innovative financial instruments, Stakeholders, Type of Engagement, Participation, Information Dissemination, Consultation, Partnership, Communications, Awareness Raising, Public Campaigns, Behavior change, Private Sector, SMEs, Individuals/Entrepreneurs, Local Communities, Civil Society, Academia, Community Based Organization, Non-Governmental Organization, Beneficiaries, Gender Equality, Gender results areas, Access to benefits and services, Access and control over natural resources, Participation and leadership, Capacity Development, Knowledge Generation and Exchange, Gender Mainstreaming, Sex-disaggregated indicators, Women groups, Gender-sensitive indicators, Capacity, Knowledge and Research, Targeted Research, Learning, Indicators to measure change, Adaptive management, Knowledge Exchange

**Sector**

**Rio Markers**

**Climate Change Mitigation**

Climate Change Mitigation 0

**Climate Change Adaptation**

Climate Change Adaptation 1

**Submission Date**

11/19/2021

**Expected Implementation Start**

6/30/2022

**Expected Completion Date**

6/30/2027

**Duration**

60In Months

**Agency Fee(\$)**

382,326.00

**A. FOCAL/NON-FOCAL AREA ELEMENTS**

<b>Objectives/Programs</b>	<b>Focal Area Outcomes</b>	<b>Trust Fund</b>	<b>GEF Amount(\$)</b>	<b>Co-Fin Amount(\$)</b>
BD-2-7	Address direct drivers to protect habitats and species and Improve financial sustainability, effective management, and ecosystem coverage of the global protected area estate GEFTF	GET	4,024,479.00	25,854,156.00
<b>Total Project Cost(\$)</b>			<b>4,024,479.00</b>	<b>25,854,156.00</b>

## B. Project description summary

### Project Objective

To conserve terrestrial and marine biodiversity by strengthening management of the Union of Comoros newly created Protected Areas Network through effective co-management with communities for sustainable development

<b>Project Component</b>	<b>Financing Type</b>	<b>Expected Outcomes</b>	<b>Expected Outputs</b>	<b>Trust Fund</b>	<b>GEF Project Financing(\$)</b>	<b>Confirmed Co-Financing(\$)</b>
--------------------------	-----------------------	--------------------------	-------------------------	-------------------	----------------------------------	-----------------------------------

Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing(\$)	Confirmed Co-Financing(\$)
COMPONENT 1. INSTITUTIONS AND GOVERNANCE SYSTEMS	Technical Assistance	<p><b>Outcome 1.</b> Systemic, institutional, technical and operational capacities strengthened to ensure effective management of the national network of protected areas, as indicated by:</p> <p><u>PA co-management capacities:</u></p> <p><i>a) Evolution of the institutional capacities, as measured by the scores based on UNDP scorecard on capacity development for GEF projects for capacities related to 1: Mobilization capacities: DGEF from 89% to 89% and NP Agency from 56% to 78% 2: Capacity to generate, access and use information and knowledge: DGEF from 67% to 80% and NP Agency from 53% to 80%</i></p>	<p><b>Output 1.1</b> The capacity of the new PA agency (Comoros National Parks), the DGEF, and the co-management committees to implement and enforce laws, regulations, and management systems related to the PA network is strengthened.</p> <p><b>Output 1.2</b> Master plans for terrestrial and marine areas within PAs harmonize relevant sectoral plans and strategies (fisheries, agriculture, forestry, tourism) with biodiversity and ecosystem service conservation priorities, and reduce inter-community disputes.</p> <p><b>Output 1.3</b> An investment framework and financing strategy is developed and implemented to support the long-term management of the PA system</p> <p><b>Output 1.4</b></p>	GET	715,570.00	1,236,065.00

Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing(\$)	Confirmed Co-Financing(\$)
COMPONENT 2. CAPACITIES FOR CO-MANAGEMENT OF THE NATIONAL PAS NETWORK AT SITE LEVEL	Technical Assistance	<p><b>Outcome 2</b> Increased protection of endemic and key species and habitats through improved management effectiveness across the national PA Network, as indicated by:</p> <p><i>Area (hectares) of forest ecosystems restored in terrestrial PAs through:</i> (i) assisted natural regeneration in the Karthala NP from 0 to 3000 ha, Mont Ntringui NP from 0 to 800 ha, Moh?li NP from 0 to 3000 ha by end-of-project (ii) reforestation with native species in the Karthala NP from 15.6 to 30 ha, Mont Ntringui NP from 9.5 to 15 ha, Moh?li NP from 4.5 to 8 ha by end-of-project (iii) control of invasive alien species (IAS) in the Karthala NP from 0 to 6 ha, Mont</p>	<p><b>Output 2.1</b> Protocols for biodiversity monitoring and data collection are developed and applied, including the operationalization of a national database on biodiversity.</p> <p><b>Output 2.2</b> Management tools (including management plans for key terrestrial and marine species used) are drafted, approved and implemented in the PAs</p> <p><b>Output 2.3</b> Effective community-based co-management models and partnerships are identified, documented, evaluated, adapted and applied at specific sites within the PA network</p> <p><b>Output 2.4</b> Blue and green carbon stocks assessed and monitored across the PA network</p>	GET	1,479,298.00	12,919,831.00

Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing(\$)	Confirmed Co-Financing(\$)
COMPONENT 3. COMMUNITY LIVELIHOODS WITHIN THE NATIONAL PROTECTED AREA NETWORK	Technical Assistance	<p><b>Outcome 3.</b> Through capacity building and partnership, directly or within value chains, private companies and local communities generate new sources of income based on the sustainable valuation of ecosystem goods and services within PAs, as indicated by:</p> <p><i>Number of beneficiaries within local communities in national parks, disaggregated by gender and disability status (PWD), who report at least a 25% increase in baseline incomes from adoption of sustainable livelihood options, thanks to new partnerships established with private companies that promote ecosystem goods and services within PAs, including fishers on</i></p>	<p><b>Output 3.1</b> Nature-based value chains with real potential for consolidation or sustainable expansion based on a partnership between the private sector and local communities, responding to a strong local market demand, are assessed and selected to provide increased incomes for local community members and contribute directly to the protection of biodiversity</p> <p><b>Output 3.2:</b> Strengthened capacities of local community members to provide goods and services that meet the needs and standards required for integration into sustainable PA-related value chains, by taking an entrepreneurial approach</p> <p><b>Output 3.3</b> Mutually beneficial partnerships between local</p>	GET	935,646.00	7,880,800.00

Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing(\$)	Confirmed Co-Financing(\$)
COMPONENT 4. KNOWLEDGE MANAGEMENT, M&E, AND GENDER AND PEOPLE WITH DISABILITIES (PWD) EQUITY	Technical Assistance	<p><b>Outcome 4</b> Effective knowledge sharing supports learning across project stakeholders, Comoros and regional SIDS as indicated by:</p> <p><i>At least twenty (20) village communities within national parks -by end-of-project- where members seek project support or apply knowledge and solutions shared through the project, outside targeted intervention sites or pilot sites (total of 74 villages in PAs) from a 0 baseline.</i></p> <p><b>Outcome 5</b> Increased opportunities for women and PWD to benefit from ecosystem goods and services in PAs and to integrate nature-based value chains linked to PAs, as indicated</p>	<p><b>Output 4.1</b> Technical knowledge and lessons learned from project experiences are compiled and evaluated to increase the effectiveness of project implementation and translated into knowledge products and disseminated within project sites, across Comoros, and among regional SIDS to strengthen the capacities of all biodiversity conservation stakeholders</p> <p><b>Output 4.2</b> National ownership and pride in the Comoros PAs through increased public perception of the richness and uniqueness of the biodiversity and landscapes and the value of the ecosystem services they provide</p> <p><b>Output 5.1</b> Gender and PWD action plans are implemented, monitored and evaluated</p>	GET	702,325.00	2,550,707.00



Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing(\$)	Confirmed Co-Financing(\$)
				<b>Sub Total (\$)</b>	<b>3,832,839.00</b>	<b>24,587,403.00</b>

**Project Management Cost (PMC)**

	GET		191,640.00		1,266,753.00	
	<b>Sub Total(\$)</b>		<b>191,640.00</b>		<b>1,266,753.00</b>	
	<b>Total Project Cost(\$)</b>		<b>4,024,479.00</b>		<b>25,854,156.00</b>	

Please provide justification

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

<b>Sources of Co-financing</b>	<b>Name of Co-financier</b>	<b>Type of Co-financing</b>	<b>Investment Mobilized</b>	<b>Amount(\$)</b>
GEF Agency	UNDP TRAC	Grant	Investment mobilized	400,000.00
Recipient Country Government	General Directorate of Environment and Forests (MAFETH)	Public Investment	Recurrent expenditures	7,294,156.00
Recipient Country Government	National Directorate of Agriculture and Livestock Strategy (MAFETH)	Public Investment	Recurrent expenditures	7,500,000.00
Recipient Country Government	National Directorate of Tourism and Hospitality	Public Investment	Recurrent expenditures	500,000.00
Recipient Country Government	National Directorate of Waste Management	Public Investment	Recurrent expenditures	250,000.00
Recipient Country Government	CRDE Hamalengo-Diboini	In-kind	Recurrent expenditures	750,000.00
Civil Society Organization	Dahari NGO	In-kind	Recurrent expenditures	4,000,000.00
Civil Society Organization	AIDE NGO	In-kind	Recurrent expenditures	750,000.00
Civil Society Organization	Banda Bitsi Association	In-kind	Recurrent expenditures	500,000.00
Civil Society Organization	Union of Chambers of Commerce, Industry and Agriculture	In-kind	Recurrent expenditures	150,000.00
Private Sector	Eco-Massiwa	In-kind	Recurrent expenditures	300,000.00
Civil Society Organization	House of Civil Society Organizations	In-kind	Recurrent expenditures	700,000.00

<b>Sources of Co-financing</b>	<b>Name of Co-financier</b>	<b>Type of Co-financing</b>	<b>Investment Mobilized</b>	<b>Amount(\$)</b>
Civil Society Organization	UMAMA Association	In-kind	Recurrent expenditures	400,000.00
Civil Society Organization	Regional Association for Forest Management and Development	In-kind	Recurrent expenditures	300,000.00
Civil Society Organization	Association for the Protection of the Gombessa	In-kind	Recurrent expenditures	200,000.00
Civil Society Organization	MAEECHA NGO	In-kind	Recurrent expenditures	820,000.00
Civil Society Organization	Ulanga Ngazidja	In-kind	Recurrent expenditures	300,000.00
Civil Society Organization	Women's Sustainable Development and Food Security Platform	In-kind	Recurrent expenditures	170,000.00
Recipient Country Government	Mitsamiouli Commune	Public Investment	Recurrent expenditures	570,000.00
<b>Total Co-Financing(\$)</b>				<b>25,854,156.00</b>

**Describe how any "Investment Mobilized" was identified**

The investments mobilized as co-financing are resources committed for the period of implementation of the GEF project by the implementing partner, the GEF agency itself (UNDP in this case) and by other non-GEF sources and which are essential to achieve the objectives of the project. The amounts have been accounted for taking into account specifically the budgeted costs for the planned interventions that will directly contribute to the expected results of the GEF project, excluding recurring expenditures. The investments mobilized are presented in Table 5 of the GEF-UNDP Project document on Co-financing which details contributions to the project activities and outputs. Also, the complementarities between this project and those with which partnerships will be established as co-financing are detailed in Table 3 of the GEF-UNDP Project Document.

**D. Trust Fund Resources Requested by Agency(ies), Country(ies), Focal Area and the Programming of Funds**

<b>Agency</b>	<b>Trust Fund</b>	<b>Country</b>	<b>Focal Area</b>	<b>Programming of Funds</b>	<b>Amount(\$)</b>	<b>Fee(\$)</b>	<b>Total(\$)</b>
UNDP	GET	Comoros	Biodiversity	BD STAR Allocation	4,024,479	382,326	4,406,805.00
<b>Total Grant Resources(\$)</b>					<b>4,024,479.00</b>	<b>382,326.00</b>	<b>4,406,805.00</b>

**E. Non Grant Instrument**

NON-GRANT INSTRUMENT at CEO Endorsement

---

Includes Non grant instruments? **No**

Includes reflow to GEF? **No**

**F. Project Preparation Grant (PPG)**

PPG Required **true**

**PPG Amount (\$)**

100,000

**PPG Agency Fee (\$)**

9,500

<b>Agency</b>	<b>Trust Fund</b>	<b>Country</b>	<b>Focal Area</b>	<b>Programming of Funds</b>	<b>Amount(\$)</b>	<b>Fee(\$)</b>	<b>Total(\$)</b>
UNDP	GET	Comoros	Biodiversity	BD STAR Allocation	100,000	9,500	<b>109,500.00</b>
<b>Total Project Costs(\$)</b>					<b>100,000.00</b>	<b>9,500.00</b>	<b>109,500.00</b>

## Core Indicators

**Indicator 1 Terrestrial protected areas created or under improved management for conservation and sustainable use**

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)
54,084.00	61,815.00	0.00	0.00

**Indicator 1.1 Terrestrial Protected Areas Newly created**

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
0.00	0.00	0.00	0.00

Name of the Protected Area	WDP A ID	IUCN Category	Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
----------------------------	----------	---------------	----------------------------	--	----------------------------	---------------------------

**Indicator 1.2 Terrestrial Protected Areas Under improved Management effectiveness**

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
54,084.00	61,815.00	0.00	0.00

Name of the Protected Area	WDP A ID	IUCN Category	Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)	METT score (Baseline at CEO Endorsement)	METT score (Achieved at MTR)	METT score (Achieved at TE)
----------------------------	----------	---------------	----------------------	----------------------------------	----------------------------	---------------------------	--	------------------------------	-----------------------------

Name of the Protected Area	WDP A ID	IUCN Category	Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)	METT score (Baseline at CEO Endorsement)	METT score (Achieved at MTR)	METT score (Achieved at TE)
Akula National Park Karthala National Park	125689 555576145	SelectProtected area with sustainable use of natural resources	26,214.00	26,214.00			53.00		
Akula National Park Moh?li National Park (Mlejelele Forest	125689 313046	SelectProtected area with sustainable use of natural resources	16,170.00	27,687.00			59.00		
Akula National Park MontNtringui National Park	125689 555576147	SelectProtected area with sustainable use of natural resources	11,700.00	7,914.00			47.00		

**Indicator 2 Marine protected areas created or under improved management for conservation and sustainable use**



Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)
58,490.00	54,762.00	0.00	0.00

**Indicator 2.1 Marine Protected Areas Newly created**

Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
0.00	0.00	0.00	0.00

Name of the Protected Area	WDP A ID	IUCN Category	Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
----------------------------	----------	---------------	----------------------------	--	----------------------------	---------------------------

**Indicator 2.2 Marine Protected Areas Under improved management effectiveness**

Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
58,490.00	54,762.00	0.00	0.00

Name of the Protected Area	WDP A ID	IUCN Category	Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)	METT score (Baseline at CEO Endorsement)	METT score (Achieved at MTR)	METT score (Achieved at TE)
----------------------------	----------	---------------	----------------------------	--	----------------------------	---------------------------	--	------------------------------	-----------------------------

Name of the Protected Area	WDP A ID	IUCN Category	Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)	METT score (Baseline at CEO Endorsement)	METT score (Achieved at MTR)	METT score (Achieved at TE)
<b>Akula National Park</b> Coelacanth Marine Park	<b>125689</b> 555576144	<b>Selected</b> Protected area with sustainable use of natural resources	9,276.00	9,276.00			43.00		
<b>Akula National Park</b> Mitsamiouli-Ndroud? NP	<b>125689</b> 555697862	<b>Selected</b> Protected area with sustainable use of natural resources	2,314.00	2,314.00			40.00		
<b>Akula National Park</b> Moh?li Marine Park	<b>125689</b> 313046	<b>Selected</b> National Park	40,400.00	36,675.00			59.00		
<b>Akula National Park</b> Shissiwani National Park	<b>125689</b> 555576146	<b>Selected</b> Protected area with sustainable use of natural resources	6,500.00	6,497.00			53.00		

**Indicator 3 Area of land restored**

<b>Ha (Expected at PIF)</b>	<b>Ha (Expected at CEO Endorsement)</b>	<b>Ha (Achieved at MTR)</b>	<b>Ha (Achieved at TE)</b>
0.00	6871.00	0.00	0.00

**Indicator 3.1 Area of degraded agricultural land restored**

<b>Ha (Expected at PIF)</b>	<b>Ha (Expected at CEO Endorsement)</b>	<b>Ha (Achieved at MTR)</b>	<b>Ha (Achieved at TE)</b>

**Indicator 3.2 Area of Forest and Forest Land restored**

<b>Ha (Expected at PIF)</b>	<b>Ha (Expected at CEO Endorsement)</b>	<b>Ha (Achieved at MTR)</b>	<b>Ha (Achieved at TE)</b>
	6,871.00		

**Indicator 3.3 Area of natural grass and shrublands restored**

<b>Ha (Expected at PIF)</b>	<b>Ha (Expected at CEO Endorsement)</b>	<b>Ha (Achieved at MTR)</b>	<b>Ha (Achieved at TE)</b>

**Indicator 3.4 Area of wetlands (incl. estuaries, mangroves) restored**

<b>Ha (Expected at PIF)</b>	<b>Ha (Expected at CEO Endorsement)</b>	<b>Ha (Achieved at MTR)</b>	<b>Ha (Achieved at TE)</b>

**Indicator 5 Area of marine habitat under improved practices to benefit biodiversity (excluding protected areas)**

<b>Ha (Expected at PIF)</b>	<b>Ha (Expected at CEO Endorsement)</b>	<b>Ha (Achieved at MTR)</b>	<b>Ha (Achieved at TE)</b>

**Indicator 5.1 Number of fisheries that meet national or international third party certification that incorporates biodiversity considerations**

<b>Number (Expected at PIF)</b>	<b>Number (Expected at CEO Endorsement)</b>	<b>Number (Achieved at MTR)</b>	<b>Number (Achieved at TE)</b>

Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)
	5		

Type/name of the third-party certification

Comoros National Parks? sustainable and fair-trade national certification for octopus, rock lobster, crayfish, mangrove crab and demersal fisheries taking place in the national parks

Indicator 5.2 Number of Large Marine Ecosystems (LMEs) with reduced pollutions and hypoxia

Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (achieved at MTR)	Number (achieved at TE)
0	0	0	0

LME at PIF	LME at CEO Endorsement	LME at MTR	LME at TE
------------	---------------------------	------------	-----------

Indicator 5.3 Amount of Marine Litter Avoided

Metric Tons (expected at PIF)	Metric Tons (expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)
-------------------------------------	--	-------------------------------------	------------------------------------

Indicator 6 Greenhouse Gas Emissions Mitigated

Total Target Benefit	(At PIF)	(At CEO Endorsement)	(Achieved at MTR)	(Achieved at TE)
Expected metric tons of CO <sub>2</sub> e (direct)	0	4768755	0	0
Expected metric tons of CO <sub>2</sub> e (indirect)	0	0	0	0

Indicator 6.1 Carbon Sequestered or Emissions Avoided in the AFOLU (Agriculture, Forestry and Other Land Use) sector

Total Target Benefit	(At PIF)	(At CEO Endorsement)	(Achieved at MTR)	(Achieved at TE)
Expected metric tons of CO <sub>2</sub> e (direct)		4,768,755		

Total Target Benefit	(At PIF)	(At CEO Endorsement)	(Achieved at MTR)	(Achieved at TE)
Expected metric tons of CO <sub>2</sub> e (indirect)				
Anticipated start year of accounting		2022		
Duration of accounting		20		

Indicator 6.2 Emissions Avoided Outside AFOLU (Agriculture, Forestry and Other Land Use) Sector

Total Target Benefit	(At PIF)	(At CEO Endorsement)	(Achieved at MTR)	(Achieved at TE)
Expected metric tons of CO <sub>2</sub> e (direct)				
Expected metric tons of CO <sub>2</sub> e (indirect)				
Anticipated start year of accounting				
Duration of accounting				

Indicator 6.3 Energy Saved (Use this sub-indicator in addition to the sub-indicator 6.2 if applicable)

Total Target Benefit	Energy (MJ) (At PIF)	Energy (MJ) (At CEO Endorsement)	Energy (MJ) (Achieved at MTR)	Energy (MJ) (Achieved at TE)
Target Energy Saved (MJ)				

Indicator 6.4 Increase in Installed Renewable Energy Capacity per Technology (Use this sub-indicator in addition to the sub-indicator 6.2 if applicable)

Technology	Capacity (MW) (Expected at PIF)	Capacity (MW) (Expected at CEO Endorsement)	Capacity (MW) (Achieved at MTR)	Capacity (MW) (Achieved at TE)

Indicator 11 Number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment

	Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)
Female	4,000	4,020		
Male	4,000	4,428		
Total	8000	8448	0	0

Provide additional explanation on targets, other methodologies used, and other focal area specifics (i.e., Aichi targets in BD) including justification where core indicator targets are not provided

## Part II. Project Justification

### 1a. Project Description

1) the global environmental and/or adaptation problems, root causes and barriers that need to be addressed (systems description);

The global environmental problems and their root causes have simply been described in more detail (in Section II of ProDoc- Development challenge, and especially in Annex 18 ? Analysis of threats to biodiversity in the Comoros national parks. Barriers to implement the long-term solution are basically the same, the only significant changes being the inclusion of the absence of a financing mechanism to support the PA system as part of Barrier #1 as it is considered as a systemic-level capacity issue, and addition of gender and persons with disabilities (PWD) issues as part of Barrier #4. The context related to the financing of the PA system has changed since the elaboration of the Concept Note, as the financial situation of the PA system is highly precarious and is now critical, especially since the process of creating an environmental fund for the Comoros (the FEC), which began several years ago, encountered a succession of dead ends, in particular the decision of the Madagascar trust fund (FAPBM) to refuse to merge the two funds for the management of an amount earmarked for the Comoros PAs, after feasibility studies and negotiations that lasted more than two years, and the partial and then total withdrawal of the allocation of 1.5 million euros pledged by a donor.

2) the baseline scenario and any associated baseline projects;

As presented in the concept note, the key baseline project is the UNDP-GEF project (PIMS 4950) that established the national system of protected areas, including the adoption of a law on protected areas (PAs) and a national strategy for expanding the PA network, the creation of a national agency to manage the PA network, and the establishment of 5 new PAs. While the national context of the pandemic had an impact on the rate of implementation, interventions remained focused on expected results as formulated in the project document. However, the relative contributions of other projects may differ somewhat since the context of the pandemic affected the development and implementation of several initiatives, some of which were delayed or cut short, and therefore their actual contribution to the project. In the Project Document, Section IV on Results and Partnerships, Table 3 provides an updated list of the contributions from other projects and interventions to the achievement of project results.

3) the proposed alternative scenario with a brief description of expected outcomes and components of the project;

The project design closely resembles the original concept note that was approved by the GEF. The description of the project components is included in Section IV ? Results and Partnerships of the GEF-UNDP Project Document. Minor changes were made to the project outcomes and outputs, which do not represent a significant departure from the project strategy as defined originally in the Project Concept Note, nor will they have an impact on the use of the funds originally budgeted. These changes are described as follows:

Concept Note Formulation	Project Document Formulation	Comments
--------------------------	------------------------------	----------

Concept Note Formulation	Project Document Formulation	Comments
<p>Outcome 1.1 Institutional, technical and operational capacity to implement the legal and institutional framework of the national Protected Areas Network (PAN)</p>	<p><b>Outcome 1:</b> Systemic, institutional, technical and operational capacities strengthened to manage the national protected area system</p>	<p>The formulation of Outcome 1 was adjusted to include <u>systemic</u> capacities which relate to policies and legislative frameworks. The implementation of the Framework Law on Environment, the Law on Protected Areas and of other laws related to biodiversity and environmental protection is hampered by the fact that there are very few regulatory texts that provide the essential information regarding governance, implementation and enforcement.</p>
<p>Output 1.1.1 Capacity of the new PA agency (Comoros National Parks), DGEF, and Co-management Committees to implement and enforce laws (including national laws and implementation mechanisms regarding CITES, regulations and management systems relating to the PAN is strengthened.</p>	<p><b>Output 1.1</b> The capacity of the new PA agency (Comoros National Parks), the DGEF, and the co-management committees to implement and enforce laws, regulations, and management systems related to the PA network is strengthened.</p>	<p>The University of the Comoros is responsible for the implementation of CITES legislation and is currently reviewing the status of the species concerned. Since this activity is already supported and given the importance of some urgent challenges to ensure the continuity of the protected areas system, which is the focus of this project, including the operationalization of a financing mechanism for the PA system and the development of alternative livelihoods to enable local communities to cease unsustainable uses of resources, it was decided to allocate project resources to activities that directly contribute to improving the co-management of protected areas and not to include this activity. Therefore, in line with STAP's advice, the project will not address national laws and implementation mechanisms of the CITES convention.</p>



Concept Note Formulation	Project Document Formulation	Comments
<p>Output 1.1.2 Strengthened strategic coordination of agencies, institutions, key ministries (Finance, Tourism, Artisanat) is facilitated to support the effective implementation of PAN management plans.</p>	<p>(removed)</p>	<p>The Agency will hold this coordination role thanks to its multistakeholder composition. The National Parks Agency was created on June 20, 2021 and is responsible for managing protected areas in accordance with the Law on the PA System including, among other things, recommending to the Minister in charge of PAs modifications to existing PAs (on its own initiative or that of other administrations), coordinating the studies and consultations required for such modifications, and <u>developing and maintaining the institutional dialogue necessary to ensure the integration of PAs in the development framework of the country</u>, including the promotion of ecotourism activities in accordance with the PA Development and Management Plans. The composition of the Agency enables it to fulfill this coordination role. Indeed, the members of the Agency bring together people who represent the State and the Regional and Local Authorities concerned by PAs, including the various ministries in charge of PAs, Tourism, Budget and Finance, Scientific Research, Fisheries and Aquaculture, and Agriculture, Governorates, Communes, Local Communities, Groups and Associations of Operators in the ecotourism and fisheries sectors, NGOs and local and international associations whose fields of activity are consistent with the purpose of the Agency, personalities with skills relevant to the purpose of the Agency and donors. With this composition, the debates on the respect for the integrity of protected areas can take place and be resolved within the Agency. Depending on the issues involved, the agency may invite, among others, representatives of the following institutions as personalities with relevant skills: the Land Service within the General Administration of Taxes and Domains, the National Directorate of Planning and Infrastructure (Ministry of Regional Planning and Urban Planning, in charge of Land and Land Transport), and the National Agency for the Promotion of Investments (within the Ministry of Economy, Investments, Energy, in charge of Economic Integration, Tourism and Handicrafts).</p>

Concept Note Formulation	Project Document Formulation	Comments
<p>Output 1.1.3 National strategies, development plans and sectoral programmes are harmonized, biodiversity priorities are integrated, and management and operationalisation of the new PAN is supported.</p>	<p><b>Output 1.2</b> Master plans for terrestrial and marine areas within PAs harmonize relevant sectoral plans and strategies (fisheries, agriculture, forestry, tourism) with biodiversity and ecosystem service conservation priorities, and reduce inter-community conflicts.</p>	<p>Harmonization of strategies and sectoral programmes at the national level is beyond the scope of this project. This product, as formulated, involves the integration of concerns for biodiversity conservation into all national strategies, development plans and sectoral plans of sectors that are relevant to PAs - in addition to the operationalization of the management of the PA network, which involves a whole different set of interventions.</p> <p>It is proposed to anchor this harmonization in a tangible way in i) the development of an integrated land use plan at the level of PAs, and ii) the harmonization of land and resource use prescriptions within the various zones delimited in this plan with the relevant jurisdictions, including in fishing, agriculture, and tourism.</p> <p>The project will therefore address this issue at the level of PAs which are governed, above all legislations, by the Law on Protected Areas. This law has precedence over other legislative tools for the use of land and resources within PAs. The planning and monitoring of land and resource uses within PAs will be harmonized with other jurisdictions such as Fisheries, Agriculture, and Tourism, through the participatory development of integrated land use plans, involving national and regional representatives of the relevant directorates. Furthermore, collaboration between these directorates and the National Parks Agency will become effective through the joint signing of agreements for the co-management of resources used by local communities.</p> <p>Major threats such as building a national road across the core area of a forest PA, leading to the destruction of hectares of primary forest and the irreversible fragmentation of key habitats for globally threatened species, is not due to insufficient harmonization of sectoral priorities, but rather to lack of understanding of the economic value and of the vulnerability of ecosystems and the services they provide.</p>

Concept Note Formulation	Project Document Formulation	Comments
<p>Output 1.1.4 An Investment Framework and Financing Strategy is developed to support long-term PAN management.</p>	<p><b>Output 1.3</b> An investment framework and financing strategy is developed and implemented to support the long-term management of the PA system</p>	<p>?Implementation? is added to stress the need to effectively mobilize funding for the Environmental Fund through this output and its purpose extended to address the ?system? rather than only the network to stress the need to support the NP Agency operations. The financial situation of the PA system is highly precarious and constitutes the main challenge for the future of Comoros? PAs. PA related tourism, which was expected to generate financing in the protected areas, is not yet developed. The process of creating an environmental fund for the Comoros (the FEC), which began several years ago, has encountered a succession of dead ends, in particular the decision of the Madagascar trust fund FAPBM to refuse to merge the two funds for the management of an amount earmarked for the Comoros PAs, after feasibility studies and negotiations that lasted more than two years, and the partial and then total withdrawal of the allocation amount of 1.5 million euros pledged by a donor.</p>
<p>Output 1.1.5 Strengthened participation of the private sector and public/private partners in conservation of the Comoros? biodiversity</p>	<p><b>Output 1.4</b> Strengthened participation of institutional partners and the private sector in supporting the national PA system and the implementation of PA development and management plans through the establishment of long-term partnerships</p>	<p>The only change is to make the goal of partnerships more focused by targeting more specifically the implementation of PA management and development plans rather than biodiversity in general.</p>
<p>Output 2.1.3 Successful community co-management models and partnerships are identified, co-adapted and applied at selected sites within the PAN (e.g. in partnership with NGOs/CBOs working on the ground, such as Dahari</p>	<p><b>Output 2.3</b> Effective community-based co-management models and partnerships are identified, documented, evaluated, adapted and applied at specific sites within the PA network</p>	<p>The specific reference to Dahari was removed as several models or approaches have been identified, Dahari?s approach is one of them. The main aspect of this output is the assessment of these models before making recommendations for their adaptation across the PA network.</p>

Concept Note Formulation	Project Document Formulation	Comments
-	<b>Output 2.4</b> Blue and green carbon stocks assessed and monitored across the PA network	This output was added to estimate carbon stocks in forests, mangroves, coral reefs and seagrass beds in the first year of the project to provide the baseline data required to assess the feasibility to access carbon markets through global mechanisms and include this approach into the resource mobilization strategy of the Comoros Environment Fund. This could also serve as an incentive for politicians and decision-makers to respect the integrity of ecosystems in PAs.

Concept Note Formulation	Project Document Formulation	Comments
<p>Outcome 3.1 Increased area under sustainable CBNRM and improved local capacity to generate nature-based livelihoods</p>	<p><b>Outcome 3.</b> Through capacity building and partnership directly or within value chains, private companies and local communities generate new sources of income based on the sustainable valuation of ecosystem goods and services within PAs.</p>	<p>The focus of this outcome is extended to value chains that include sustainability, profitability, equity, and CBNRM. Component 3 has been slightly reoriented to respond to STAP and other reviewers concerns and to recommendations expressed in targeted workshops with focus groups early in the project preparation process, but above all to ensure that tangible benefits are enjoyed by local communities and provide adequate incentives to give up activities that are detrimental to species and ecosystems. The project also takes into account the recommendations of 6 community workshops that took place as part of the GEF ID 10351 project to assess the impacts of IGAs developed by environmental projects over the past 23 years in the Comoros. These workshops brought together 120 beneficiaries of IGAs and private sector representatives. Beyond the fact that more than 75% of funded IGAs no longer exist, findings include that the limited number of IGA ideas (options whose feasibility and impact had not been assessed before their implementation) resulted in the replication of the same unsuccessful models from one village to another, and the communities supported did not feel accountable for the financial support they received.</p> <p>To address the above, the component 3 of the project is focusing on partnerships between private businesses and community cooperatives directly or through the development or expansion of nature-based value chains and the strengthening of their capacities to ensure the sustainability and profitability of the livelihoods for local communities. The issue of land and resource tenure will be addressed under component 1 and local capacities for sustainable management of natural resources will be strengthened under component 2.</p> <p>The project is aligned with STAP guidance to generate local and global benefits, including</p> <p>? <u>Helping strengthen community land and resource tenure</u>: The Project will contribute to clarify the issue of land tenure, particularly to ascertain the extent of community land ownership, or village terroirs, within the National Parks through output 1.2 on the development of master plans for terrestrial and marine/coastal areas within protected areas, and more specifically sub-outputs 1.2.1 on the participatory delineation and mapping of village terroirs within protected areas, the translation of the georeferenced coordinates of the PA</p>

<b>Concept Note Formulation</b>	<b>Project Document Formulation</b>	<b>Comments</b>
<p>Output 3.1.1 Study carried out on ecosystem services that are provided at the new PAs, results are shared and community understanding is enhanced for informed decision making</p>	<p>(removed)</p>	<p>Ecosystem valuation studies are being conducted by the UdC with the support of academics from Madagascar. These are lengthy, technically complex, and involve costly surveys required to collect data and carry out related analyses, with uncertain results as regards the intended result which is to guide local communities? decision-making. National capacities to carry them out are limited. Such studies were conducted for one ecosystem service, i.e. water, on one island (Mwali), by scientists of the University of Comoros with the support of scientists from Madagascar and results are difficult to understand for non-scientists and unconvincing for the country's authorities and even less for local communities. The issue was discussed with members of the PA Agency and it was agreed that the theoretical economic value of an ecosystem would not be a convincing argument to promote conservation. The project rather proposes to support the development or expansion of value chains in partnership with the private sector to provide sustainable livelihoods and tangible income to the most vulnerable people with the expected result that the development of alternative livelihoods will enable local communities to cease unsustainable uses of resources. Yet, the value of the ecosystems in national parks on the blue and green carbon markets will be assessed under Output 2.4, including through global mechanisms such as the Global Coral Reef Fund.</p> <p>It was thus decided to allocate project resources to activities that directly contribute to improving the co-management of protected areas and not to include this activity. The purpose of convincing local communities of the value of healthy ecosystems and biodiversity will be best served by developing sustainable livelihoods through nature-based value chains (Outcome 3), and the purpose of convincing government authorities of the value of integral ecosystems and biodiversity will be best served by an assessment of the monetary value of healthy terrestrial and coastal / marine ecosystems in blue and green carbon markets (Output 2.4).</p>

Concept Note Formulation	Project Document Formulation	Comments
<p>Output 3.1.2 Nature-based livelihood options that will provide long-term security are identified, developed and turned into income-generating activities.</p>	<p><b>Output 3.1</b> Nature-based value chains with real potential for consolidation or sustainable expansion based on a partnership between the private sector and local communities, meeting a strong local market demand, are assessed and selected to provide increased incomes to local community members and contribute directly to biodiversity protection</p>	<p>Changes made in line with explanations provided for outcome 3.</p>
<p>Output 3.1.3 Training provided to re-develop and refine artisanal skills within communities, to enhance the value of natural forest and coastal resources for biodiversity-friendly alternative income-generating activities.</p>	<p><b>Output 3.2:</b> Building the capacity of local community members to provide goods and services that meet the needs and standards required for integration into sustainable PA-related value chains, by taking an entrepreneurial approach.</p>	<p>Changes in outputs under the component 3 are in line with the findings of the community workshops that took place as part of the GEF ID 10351 project to assess the impacts of IGAs developed by environmental projects over the past 23 years in the Comoros. Beyond the fact that more than 75% of funded IGAs no longer exist, findings include that the limited number of IGA ideas (options whose feasibility and impact had not been assessed before their implementation) resulted in the replication of the same unsuccessful models from one village to another, and the communities supported did not feel accountable for the financial support they received. Local communities expressed the wish to be supported to identify and develop new livelihood options.</p>
	<p><b>Output 3.4</b> Strengthening the business capacities of private enterprises whose operations are linked to PA resources, in order to ensure the sustainable expansion of value chains that have a high potential to provide increased incomes for local community members and contribute directly to biodiversity protection</p>	<p>Except for Eco-Massiva, which has developed its activities for a few years and which even serves an international market, the small businesses that work with local communities within national parks are small and established relatively recently. All have expressed a keen interest in receiving support to strengthen their entrepreneurial capacities so that the expansion of their activities through partnership with local communities is sustainable, both environmentally, socially and economically. Strengthening business capacities of private enterprises has been identified as a key priority by the private sector focus group as part of the PPG process.</p>

<b>Concept Note Formulation</b>	<b>Project Document Formulation</b>	<b>Comments</b>
Output 3.1.4 The necessary processes and mechanisms required to ensure tangible (and maximum) benefits accrue to targeted communities are identified and set up		This output has been merged with output 3.3 on mutually beneficial partnerships.



Concept Note Formulation	Project Document Formulation	Comments
<p>Output 3.1.5 Partnerships with private sector (for investments into value chain development for selected products) developed and appropriate joint venture agreements finalized (based on feasibility studies to be carried out) to reduce threats to vulnerable ecosystems within selected PAs</p>	<p><b>Output 3.3</b> Mutually beneficial partnerships between local producer/harvesters/fishermen cooperatives (men and women) and private sector actors are developed with the support of the Mayors and the PA Agency to support the growth of the selected value chains and to develop equitable partnership agreements (based on the feasibility studies carried out) that contribute to the reduction of threats to the ecosystems within PAs</p>	<p>?Public-private venture is a mode of financing by which a <u>public authority</u> calls on <u>private service providers</u> to finance and manage equipment providing or contributing to a public service. The private partner receives in return a payment from the public partner or from the users of the service it manages.? Such partnership is not yet the preferred model in Comoros due to the still limited development of the private sector and limited resources of the Government to support the country?s protected areas system and commit in such agreements. The private sector is largely informal, counting around 65,000 individual production units with an average of 2.1 workers per unit, predominantly in agriculture and retail trade. Private sector is still incipient in Comoros and has little capacity to finance conservation in the framework of corporate responsibility schemes. Private businesses are mostly small and focused on retail. Also, joint ventures are generally temporary arrangements whereas the project will seek to support the establishment of <u>long-term mutually beneficial partnerships</u>. Therefore, it was decided to target small start-ups whose activities are based on natural resources in the national parks and to support them through capacity building, close support, and to develop long-term partnership with local communities to help them expand their operations and ensure they are sustainable. The resulting value chains are expected to provide reliable sources of income to local community cooperatives. The formulation of the outputs to achieve Outcome 3 was adjusted to reflect this objective.</p> <p><u>In addition</u>, the project will implement these interventions to benefit local communities from all PAs in the national network rather than selected PAs. The local communities are very sensitive to the lack of equity in the support of a project, whether it is between the islands or between the different PAs of the network. The choice of IGAs takes this aspect into account and favors activities that can be developed or strengthened over more than one PA.</p>

Concept Note Formulation	Project Document Formulation	Comments
	<p><b>Output 3.5</b> Development of a marketing strategy -for all products developed in connection with PAs- focused on biodiversity protection, fair trade, and branding in connection with PAs</p> <p><b>Output 3.6</b> Support for the start-up of value chains</p>	New outputs added in line with explanations provided for outcome 3.
-	<p><b>Outcome 5:</b> Opportunities increase for women and people with disabilities (PWD) to benefit from ecosystem goods and services in the protected areas (PAs) and to integrate nature-based value chains that are linked to the PAs</p>	This outcome was added to highlight expected results related to women's empowerment under component 4.
Output 4.1.1 Gender empowerment strategy developed and used to guide project implementation and M&E at all levels of project activities	<p><b>Output 5.1</b> Gender and PWD action plans are implemented, monitored, evaluated and adapted.</p>	Inclusiveness relates to women but also to people living with a disability (PWD). In addition to the Gender action plan, an action plan will be developed, implemented, evaluated and adapted to generate specific benefits for PWDs.
Output 4.1.2 Public awareness on ecosystems/species conservation and the value of the PAN raised through targeted outreach and education campaigns		This output has been merged with the 4.1.4 output in the new formulation of the 4.1 output.
<p>Output 4.1.4 Lessons learned disseminated locally (ie at project sites), across Comoros and among regional SIDS</p> <p>Output 4.1.5 Participatory M&amp;E and learning system developed and implemented for adaptive project management</p>	<p><b>Output 4.1</b> Technical knowledge and lessons learned from project experiences are compiled and evaluated to increase the effectiveness of project implementation and translated into knowledge products and disseminated within project sites, across Comoros, and among regional SIDS to strengthen the capacities of all biodiversity conservation stakeholders</p>	These activities have been merged and integrated under output 4.1

4) alignment with GEF focal area and/or Impact Program strategies;

No change.

5) incremental/additional cost reasoning and expected contributions from the baseline, the GEFTF, LDCF, SCCF, and co-financing;

The total expected contribution from the GEFTF increased from \$4,390,805 to \$4,406,805, with the addition of the remaining funds in the country portfolio envelope. The total amount of confirmed co-funding (\$25,454,156) is practically the same as that announced in the concept note (\$24,400,000) but the respective contributions differ between the different groups of partners. Higher grant and in-kind contributions were confirmed from NGOs through activities and funded projects that contribute to the project objectives. These contributions are presented in Table 5 ? Co-financing and contributions to the project, in Section VIII ? Financial Planning and Management of the ProDoc.

Furthermore, the following narrative presents changes in the baseline scenario since the PIF and GEF contribution to provide global benefits:

Baseline scenario. To reduce the pressures on biodiversity, the country has initiated the establishment of a system of protected areas. The GEF ID 5062 / UNDP PIMS 4950 project made it possible to set up a legal and strategic framework on PAs and increase the protected areas to 61,815 ha of terrestrial areas and 54,762 ha of marine areas within national parks (corresponding respectively to 25% of the land territory and 6% of the territorial waters), has set up a system of co-governance in which all stakeholders, including local communities, are effectively represented and take part in management decisions, established an agency responsible for the management of the PA network and has contributed to increase the capacities of stakeholders involved in the co-management of the PAs. In recent years, the surveys carried out in national parks have shown the stability of populations of Livingstone's Fruit Bat and of the three Otus species, allowed to increase knowledge on populations of species of global importance such as *Eulemur Mongoz* and whales and dolphins that frequent Comorian waters, and have shown an increase in the use of beaches and seagrass beds by sea turtles, a decrease in the poaching of marine turtles, and a decrease in the rate of deforestation within the protected areas.

With the support of its development partners, the country will implement a set of interventions aimed at improving natural resource management, knowledge management and poverty reduction in rural areas.

Reforestation interventions are planned as part of projects whose intervention areas include areas within PAs. The Resilience and Integrated Management of Watersheds Project (funded by GEF/UNEP, 2017-2020) carried out reforestation within the watersheds of the three islands. The GCF / UNDP Climate Resilient Water Supply Project in the Comoros (2021-2027) also includes watershed reforestation interventions to protect the water supply.

Interventions are planned to improve environmental knowledge management. Thus, the regional project 'Ecosystem-based Adaptation in the Indian Ocean' including the Comoros, (funded by GCF, 2021-2030) should allow the establishment of an ecosystem profile and support the implementation of ecosystem restoration actions by civil society and improve knowledge management for sustainability and replication. The regional DIDEM program (2021-2024, funded by FFEM and GEF) will be implemented in Shissiwani and Moh?li national parks to improve negotiation and decision-making capacities and the development of sustainable management policies for coastal and marine environments based on scientific knowledge.

Interventions will be implemented to improve governance and management of natural resources and fishing capacities and provide for improved protection of marine and coastal habitats. The 'Protected

biodiversity and building resilience through effective management of the marine protected areas of the Comoros' project (funded by the Ocean'5 Fund, 2021-2023) implemented by the South African NGO WildOcean, CORDIO, the NP Agency of the Comoros, AIDE and UdC, plans to support and improve the management of marine protected areas and increase the total marine area under protection. The project 'Implementation of the strategic action program for the protection of the Western Indian Ocean from land-based sources and activities' of the WIOSAP regional program (UNEP, 2020-2023) implemented in the Shissiwani NP will help build the capacities of fishers to participate in the monitoring of coral reefs, seagrass beds and mangroves and to restore the islet of Selle. The SWIOFISH project (financed by the World Bank, 2018-2022) should allow local communities of MPAs to consolidate their participation in the co-management of fishery resources and improve the capacities of traditional fishermen through training in fishing techniques, management of fishery resources, and monitoring of co-management agreements.

Various projects will contribute to reducing rural poverty within the territories of the NPs by creating jobs, supporting agricultural production and tourism development and building entrepreneurial capacities. The 'Support for the production and resilience of family farms' project (IFAD funded, 2017-2022) enabled vulnerable smallholder farmers to improve their agricultural production and income, as well as their capacity to cope with climate change. The 'Employment Facility' project (financed by AFD, 2020-2024) aims to improve the income of the rural population by reducing food dependence on imports, developing a sustainable professional activity, whether individual or salaried, and the establishment of a range of services in rural areas. The AFIDEV project (financed by AFD, 2021-2025) provides for the development of cash crop and market garden value chains in the NPs of Moh?li, Karthala and Mont Ntringui by relaunching sustainable production, improving income of farmers and sharing of benefits - especially for women and young people - from the main export and market gardening sectors. The Integrated Tourism Framework program (multi-donor trust fund, 2019-2023) whose implementation is planned in the Karthala and Mont Ntringui NPs aims to strengthen the capacities of local communities in microenterprise management and build community-managed ecotourism infrastructure. The 'Financial Empowerment of Women' project (financed by the AfDB, 2020-2022) will be implemented in the Shissiwani and Coelacanth NPs with a view to promoting the socio-economic inclusion and entrepreneurship of women fishers and farmers. The FAO regional project 'Resilience of fishing communities' (funded by Japan, 2021-2024) aims to increase the sustainable production, marketing and productivity of small-scale fisheries, strengthen the coherence of policies and investment plans through dialogue in the fisheries sector, and promote the blue economy based on the sustainable use of marine resources and maritime transport. The project to set up a plastic waste recovery and buyback center in Moh?li (funded IOC UNDP, 2021-2023) must operationalize a financial mechanism to recover and buy back plastic waste from communities and recycle it in collaboration with the private sector.

However, all of these interventions will not be sufficient to reduce the pressures on biodiversity and the support of the GEF remains necessary to ensure the protection of biodiversity of global importance within the protected areas of the Comoros.

Indeed, without the intervention of the GEF, the survival of the system of protected areas set up and supported by a succession of projects is threatened by the absence of a sustainable funding mechanism

dedicated to the system of protected areas and to biodiversity conservation. All of the projects that support local communities in rural areas and in protected areas will reduce poverty but will not specifically benefit communities within PAs that are affected by enforcement of PA regulations that restrict their access to natural resources and the practice of activities that have adverse effects on biodiversity. Despite previous and current interventions, the legal framework for the protection of the environment and specifically that of biodiversity is incomplete (missing implementing texts) and its scope is limited because it remains insufficiently known, which gives rise to inappropriate decisions inconsistent with the legal framework. Interventions to restore terrestrial ecosystems and improve the sustainability of fishing activities are limited to small areas, and without the consistency required to restore ecosystem functions. Reforestation is carried out without strategic reforestation planning that would restore critical habitats for biodiversity. The projects are located in too small a number of villages to have an impact on the conservation of biodiversity and intervene in areas which are not a priority for the preservation of biodiversity. Most of the projects aim to increase the income of fishermen by increasing the efficiency of fishing and do not include measures to avoid overexploitation of coastal resources.

The baseline scenario thus contains a set of gaps in the face of the challenge of conserving biodiversity of global importance in the Comoros: the absence of an operational mechanism for sustainable financing to support the conservation of marine and terrestrial biodiversity within the protected areas network; the gaps in the legal framework which limit its effective enforcement for the conservation of biodiversity; the absence of a planning framework (except on the island of Mwali where a development plan is being drawn up) to ensure the consistency of the interventions, resulting in a lack of synergy and coherence in the restoration actions to restore ecosystem functions and to restore critical habitats for biodiversity; gaps in capacity for biodiversity monitoring, surveillance in PAs, and communication to promote biodiversity and the benefits it provides at local and national levels; despite all the interventions of the partners, the country still does not have a georeferenced knowledge management system dedicated to PAs and biodiversity conservation; lack of knowledge about carbon sequestration capacities within marine and terrestrial ecosystems and how to benefit from them in carbon markets; poverty, lack of alternative livelihoods and inadequate capacity of local communities to benefit from ecosystem goods and services pushes them to pursue unsustainable uses; the vulnerability of women and PWDs in rural areas persists due to the difficulties in benefiting from the opportunities offered by the valuation of ecosystem goods and services provided by protected areas; the lack of visibility and ignorance of PAs and biodiversity at the national level hinders the mobilization of a support network and changes in the behavior of populations who do not know the value of the resources at their disposal.

The new GEF project for the protection of biodiversity through the effective management of the national network of protected areas will provide a framework that will improve the synergies within these investments and the coherence of interventions within the PA network to improve the positive effects on the conservation of globally important species and their critical habitats, and thus contribute to the achievement of the ambitions displayed by the government through its Emerging Comoros program. The successful implementation of the project will strengthen the systemic, institutional and individual capacities for the co-management of the protected area system in order to ensure the conservation and sustainable management of the biodiversity it harbours. The legal framework will be

consolidated, including the law on protected areas, in order to increase the applicability and use of tools to prevent the negative effects of a potential development. Essential support will be mobilized to supply and operationalize the Comoros Environmental Fund dedicated to financing the protected areas system in the medium and long term. The partnerships of the new national parks agency with local communities, scientific institutions, NGOs and other partners for the implementation of management plans will be consolidated and collaborations facilitated by the development of a coherent framework for the use of land and coastal areas and resources within protected areas. Targeted awareness and capacity building for local communities, the national parks agency, co-management committees and government partners will increase the capacity to implement protected area management and development plans and improve understanding of the need to support them for their environmental, social and economic values. Equitable benefit sharing through value chains based on the sustainable use of biodiversity and developed in partnership with private entrepreneurs will provide incentives and support the livelihoods of local communities.

6) global environmental benefits (GEFTF) and/or adaptation benefits (LDCE/SCCF);

No change.

7) innovativeness, sustainability and potential for scaling up. ?

The presentation of these aspects in the project document differs from what was briefly stated in the concept note. The text from the section IV of the GEF-UNDP Project Document is copied below:

Innovativeness, Sustainability and Potential for Scaling Up:

**Innovation.** This project adopts innovative approaches in the Comorian context for the following aspects: i) establishing business partnerships between local community cooperatives and the private sector to develop or expand nature-based value chains that have a potential to provide sustainable livelihoods to local communities, ii) developing a national certification system for products developed through value chains that are sustainable, equitable and related to the national protected areas, iii) assessing blue and green carbon stocks in the protected areas ecosystems, which is still new in Comoros and has yet to be integrated into systems to access carbon markets, iv) the systematic use of drones for long-term ecological monitoring of ecosystems and biodiversity is new in the Comoros and greatly increases the potential and scope of research to support the development of protected areas, and v) the different resource mobilization approaches that will be explored in the project represent potential for innovation at the national level, e.g. payments for ecosystem services, blue and green carbon, and green taxes.

**Environmental sustainability** will be ensured through strengthening capacities at all levels, including the government and NP Agency, in biodiversity conservation planning, implementation and assessment, data collection and management, and monitoring/evaluation protocols and practices; through strengthening PA co-management effectiveness in all NPs; through the development of alternative sustainable and profitable livelihoods to encourage local communities to abandon unsustainable practices harmful to biodiversity and ecosystems; through strengthening surveillance and enforcement of regulations targeting structured illegal practices; through developing management plans for key terrestrial and marine species used in value chains which implementation will involve the monitoring of exploited stands or populations to ensure their preservation.

**Financial sustainability** will be ensured by operationalizing the Comoros environmental fund and by mobilizing the necessary financial resources so that the national system of protected areas can rely on a diversified and autonomous financing mechanism and to reduce its dependence on external sources of financing, and through developing partnerships between local cooperatives and private businesses which operations are based on resource and ecosystem use in the national parks, supported by capacity building in business planning, entrepreneurship and risk management, and providing local support for starting-up the new businesses. Financial sustainability will also be improved through the development of a business plan for the PA system, as part of the PA management and development plans. It will be essential that the various land and resource uses within the protected areas generate sufficient benefits at all levels for local communities to perceive tangible, short- and medium-term interests resulting from the adoption of improved and sustainable practices.

**Social sustainability** will be supported by several elements, starting with the formal recognition of local communities' rights, benefits and contributions in their co-management agreements with the NP Agency (beyond roles and responsibilities) and of the village boundaries within PAs in order to secure the terroirs. The project will also support effective participatory processes with a focus on gender and PWD integration involving local users, technical services and authorities at all levels, for assessments, negotiations, decision-making, implementation, monitoring and evaluations, including extensive involvement of stakeholders at all levels for the participatory land and resource use planning. It is expected that local actors will have better ownership of the decisions and planning made through a transparent and participatory approach. Greater involvement of local communities and equity of revenue and benefit sharing from biodiversity conservation and sustainable management of natural resources and ecosystem services will be cross-cutting elements of interventions, especially under components 1 and 3. Namely, for improving PA management effectiveness, the project will support the collaborative management approach through recognizing local communities rights and benefits regarding PAs and their resources, and developing capacities of both the NP Agency and local communities to consolidate trust between PA institutions and local communities, ensure their effective involvement and enhance their perception of the benefits resulting from the ecosystem services provided by PAs. Furthermore, social sustainability will be improved through developing equitable partnership agreements with private entrepreneurs to develop sustainable value chains based on natural resources within the PAs to ensure a fair and equitable sharing of the benefits generated among all stakeholders which will serve as an incentive to adopt and maintain sustainable land and resource use practices. Sustainability of the training programmes will be supported through the systematic capturing, analysis, and dissemination of the technical documentation, experiences and learnings, and integration of training material into the curricula of academic institutions.

**Potential for scaling up.** The project includes the elements needed for scaling-up its outputs and outcomes, first across the national parks and within the country, and potentially in other countries with similar issues and context. Replication elements include i) developing participatory land- and coastal use plans that will provide commonly agreed frameworks to coordinate the conservation and restoration interventions of all current and potential partners within the national protected areas (output 1.2), protocols for the monitoring of biodiversity that enable of communities and other stakeholders to participate (output 2.1), and management plans for natural resources that support value chains (output 2.2), ii) conducting a participatory assessment of community-based co-management models to provide

a set of participatory management approaches that could be adapted and applied in other sites, iii) involving all actors in decision-making, planning, monitoring, evaluating and learning, iv) building capacities at all levels to ensure effective participation and implementation of interventions by all stakeholders, including women and PWD, v) strengthening capacities of the staff of the NP Agency including Community Mobilizers and Ecoguards to provide support and supervision to local communities and develop new value chains or expand existing ones, vi) documenting all interventions, their implementation, results and lessons learned, including interventions targeting women and PWD, so that they can be easily shared with local partners and disseminated regionally for replication in other sites (outputs 4.1 and 5.1), and vii) develop and implement a national certification system for PA products developed through sustainable and equitable value chains which, through monitoring of implementation and results, will provide learnings to be shared as knowledge products for their potential application to other products that meet the same criteria.

#### **1b. Project Map and Coordinates**

**Please provide geo-referenced information and map where the project interventions will take place.**

Geo-referenced information and maps of the protected areas where the project interventions will take place are provided in annex E. Most maps are the same as those presented as annexes to the Concept Note, except for terrestrial protected areas where zoning has been integrated into the maps.

#### **1c. Child Project?**

**If this is a child project under a program, describe how the components contribute to the overall program impact.**

#### **2. Stakeholders**

**Select the stakeholders that have participated in consultations during the project identification phase:**

**Civil Society Organizations** Yes

**Indigenous Peoples and Local Communities** Yes

**Private Sector Entities** Yes

**If none of the above, please explain why:**

**Please provide the Stakeholder Engagement Plan or equivalent assessment.**

UNDP is committed to meaningful, effective and informed stakeholder engagement in the design and implementation of all UNDP projects. Effective stakeholder engagement is a cornerstone for achieving sustainable development. Government agencies (national and local), civil society actors and organizations, indigenous peoples, local communities, the private sector and other key stakeholders are essential partners in advancing human rights-based development. Effective stakeholder engagement is



fundamental to achieving the Sustainable Development Goals (SDGs) and applying the principle of "leaving no one behind" to address inequalities and ensure equity and non-discrimination in all programming areas.

UNDP's key stakeholder engagement requirements for the project are presented below.

? Ensure meaningful, effective and informed stakeholder participation in the formulation and implementation of UNDP programs and projects by providing opportunities for stakeholders to express their views at all stages of the project decision-making process on issues that affect them.

? Conduct stakeholder analysis and engagement in a gender-sensitive, culturally sensitive, non-discriminatory, and inclusive manner, identifying potentially affected vulnerable and marginalized groups and providing opportunities for their participation.

? Develop stakeholder engagement plans at the appropriate scale, with a level and frequency of engagement that reflects the nature of the activity, the magnitude of potential risks and adverse impacts, and the concerns raised by affected communities.

? Include differentiated measures to enable the effective participation of disadvantaged or vulnerable groups, including people with disabilities

? Document and report on consultations in a format accessible to participants and the public

? Ensure early and iterative meaningful engagement of stakeholders throughout the assessment and management of potential social and environmental risks and impacts

? Ensure that stakeholders who may be affected by the project can communicate their concerns and grievances, including, if necessary, through an effective grievance mechanism at the project level, as well as the UNDP Stakeholder Response Mechanism and the Social and Environmental Compliance Unit

### **3. Summary of all previous stakeholder engagement activities**

Project stakeholders were fully involved in the process of drafting the project document. Discussions focused on the steps required in the preparation of the project and the types of project activities. Various meetings were held to present the project as a whole including the expected outcomes as formulated in the Project Identification File (PIF). These meetings were motivated by the following objectives: (i) Raising public awareness of the Project preparation and approval process; (ii) Informing stakeholders on how they can be involved in the project preparation; (iii) Identifying initial inputs from the State technical structures for the project design process and to gather feedback from stakeholders and local communities.

From the outset, stakeholder consultation meetings were held, taking into account the context of the COVID-19 pandemic which limited gatherings of more than 20 people.

The DGEF (meeting of July 11, 2020) made the following recommendations: (i) enhance the human resources of the national protected areas agency; (ii) review the Comoros national environmental

policy, which dates back to 1994; (iii) recruit a regional consultancy firm to set up a geo-referenced database; (iv) review the community monitoring mode and involve the gendarmes and the national coast guard; (v) also focus on revising the national forest inventory; and (vi) include ecosystem accounting and carbon credit assessment.

The NGOs (meeting of July 13, 2020) made the following recommendations: Under Component 1, resolve the land tenure problem of protected areas, advocate for the opening of a "management of environmental offenses" unit within the justice system, and continue awareness-raising activities and popularization of legal texts related to protected areas. For Output 1.3 on financing protected areas, the NGOs recommend passing the law on foundations and abandoning the FEC/FAPBM association, which is not acceptable because of the clause that requires all Comorian funds to be placed with FAPBM in the form of a donation. The NGOs recommend that we take our own destiny in hand and have the courage to open our own fund. For Component 2 on Capacity Building to improve the co-management of the national PA network at the site level, the NGOs recommend entrusting the implementation of activities to local NGOs instead of recruiting specialists, developing the mapping of Comoros' biodiversity and preparing appropriate communication media. The NGO Ulanga is specialized in this field and is available to support the protected areas. For component 3, the NGO MAEECHA has expertise in structuring community associations and groups. This is an essential step in this project as far as IGAs are concerned. The NGOs recommend working actively with the diaspora in the development of income-generating activities and promoting the parks and their potential to the diaspora. For component 4, the NGOs recommend supporting the involvement of women with concrete actions, mobilizing women's groups to support protected areas and providing training to women.

The meeting with State institutions (July 14, 2020) recommended that local communities play a major role in the management of protected areas, and that they know what they are defending. Communication needs to be improved and adapted for each stakeholder, even if it means using a specialized Comorian company. The project must move towards the establishment of a Comorian fund dedicated to protected areas and prepare a strategy for mobilizing local funds based on a mapping of funding sources identifying all potential sources. The project must maintain a partnership with the FAPBM in order to exchange best practices. The University of the Comoros will guarantee the sustainability and capacity building of the park co-management actors. A professional degree in protected area management will be available in Anjouan from the beginning of the academic year 2021. The Planning Commissioner also proposed to involve the research component of the University of Comoros and to promote self-employment. One recommendation also relates to the promotion of community volunteering. Community members who have benefited from training and who have been involved in several volunteer activities should be able to access the professional degree of the University of Comoros to enhance their achievements. The project should also find a link with the NAGOYA unit since the Law on Access and Benefit Sharing has just been promulgated by the Head of State. For Component 2, State institutions have proposed to advocate with the Ministry of the Interior for the assignment of gendarmes to each protected area. These gendarmes would be responsible for surveillance in support of the community eco-guards. The project should be an opportunity to review CITES and the list of species to be protected. The project could also include the development of an Atlas of the Biodiversity of the Comoros, in partnership with the CNDRS, which has already published documents on certain taxa.

The private sector (July 15, 2020) proposed to move forward with the operationalization of the FEC, to develop a short, medium- and long-term funding strategy with a focus on internal funding opportunities and to develop a law on foundations allowing the country to be able to manage their own long-term fund. The private sector recognizes that the problem of land tenure coupled with weak legal protection of investments remains a major obstacle to private sector participation in protected areas. The Comorian private sector is ready to support the Comoros protected areas in all livelihood and income-generating activities. The private sector recommends focusing on value chains. Several initiatives are already in place and supported by the private sector such as moringa, coffee, cocoa, coconut and others. The project should learn from these initiatives and bring them to community-based women's groups or create a bridge between the village-based groups that harvest the products and the private sector that processes and markets them. The private sector recommends that a 'Product of Comoros National Parks' label be considered for all identified value chains and that a national certification process be put in place to facilitate the marketing of value chain products. In any case, each value chain should be subject to a feasibility study and business plan to help private entrepreneurs assess the benefits they can derive from value chains by supporting community-based initiatives. The private sector finally recommends the creation of an oceanography museum in Mwali and Coelacanth Park. Comorians do not like to go to the sea, but they can visit these museums with their families.

Meetings of community members, the co-management committee and the village committee were held in each protected area from July 22 to 25, 2020 to launch the project preparation process (PPG). Discussions focused on the development of income-generating activities and the effective involvement of eco-guards in the communities.

Following the recommendations of stakeholders and local communities, PPG launch workshops were held on the 3 islands, in Ngazidja on August 10, 2020, Ndzuani on August 13, 2020 and Mwali on August 17, 2020.

#### **4. Project Stakeholders**

The stakeholder analysis identified the key stakeholder groups that will be informed and engaged in the project. These include individuals or groups that: i) are directly and/or indirectly affected by the project, including direct and indirect beneficiaries, ii) have interests in the project that determine them as stakeholders, and iii) can influence the project's outcomes or operations.

The stakeholder engagement plan takes into account the capacities of various stakeholder groups to participate effectively in activities that require their involvement and includes measures to support them where capacity is limited. Indeed, the sustained involvement of women, even educated women, is difficult to achieve because of their dependence on their husbands who often hold the decision-making power. A public awareness campaign will focus on the essential role of women in the sustainable management of natural resources and will advocate for their active involvement in all stages of resource management, including planning, implementation, and ongoing evaluation of this management, particularly as beneficiaries. Also, speaking up in mixed gender meetings is difficult for women with limited education. It may therefore be necessary to organize separate male-female meetings, when necessary and possible. This sensitive issue varies from village to village, due to traditional values in some settings, a conception of women's inferiority and their subjection to the authority of the head of the family.

#### **5. Stakeholder Engagement Program**

The engagement approach differs depending on the categorization of stakeholders. The Project has a stakeholder engagement plan that includes awareness, communication, information, and mobilization activities that will be reinforced by the implementation of a strategic and targeted project-specific communication plan.

In preparing the stakeholder engagement plan, the project will use a variety of engagement techniques to promote effective participation and accountability:

- Interviews with stakeholder representatives and key informants
- Surveys, polls and questionnaires
- Public meetings, workshops and/or focus groups with specific groups
- Participatory methods
- Other traditional consultation and decision-making mechanisms

COVID context. In the context imposed by the COVID-19 pandemic, whose end is not currently foreseeable on the global scale and in the Comoros, the project will have to provide for an adjustment of mobilization methods. In order to respect the barriers to the spread of COVID-19 and the government's directives, large gatherings will be avoided, and popular consultations will be sequenced in small discussion groups. The organization of any meeting will also have to impose the obligation to respect the sanitary measures recommended by the State (social distancing, wearing of face coverings, use of aseptic gel, limitation of the number of participants in closed rooms).

**Table A. Simplified Stakeholder Engagement Plan.**

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>Ministry of Agriculture, Fisheries, Environment, Tourism and Handicraft (MAFETH)</b>	<p>The Ministry of Agriculture, Fisheries, Environment, Tourism and Handicraft (MAFETH) has primary responsibility for environmental management and has a broad mandate for the conservation and sustainable use of natural resources, including biodiversity conservation. This ministry is also the focal point for all environmental conventions in Comoros. More specifically, MAFETH is the supervisory body for the protected areas of Comoros, the management of which it delegates to the Comoros National Parks Agency in accordance with the provisions of the Law on the National System of Protected Areas of Comoros. The Secretary General of MAFETH ensures the coordination and supervision of the following organizations that are directly involved in the implementation of the project: (i) INRAPE, (ii) the GIS Department, (iii) the Fisheries Monitoring Center, and (iv) the Comoros Geology Bureau.</p> <p>The Ministry is structured into five national directorates, namely Environment and Forestry, Fisheries Resources, Agricultural Strategies, National Waste Management Agency and the National Research Institute for Agriculture, Fisheries and the Environment (INRAPE). The Ministry has 98 positions, all directorates combined.</p> <p><b>Planned participation in the project</b></p> <ul style="list-style-type: none"> <li>- To coordinate and direct all project activities (output 1, 2, 3, 4)</li> </ul> <p>To ensure, along with the agency, the effective implementation of management and development plans for protected areas (sub-output 2.3.2, year 3)</p>	<p>Meetings; workshops; direct mail</p>	<p>Supervision of all project activities</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>General Directorate of Environment and Forests (DGEF) / Ministry of Agriculture, Fisheries, Environment, Tourism and Handicraft</b></p>	<p>The DGEF has the national mandate for the conservation and sustainable management of natural resources and the overall coordination and management of the PA system. The DGEF is delegated by the Ministry to support and monitor the National Agency for the Management of Comoros National Parks. The DGEF chairs the Agency's Board of Directors in accordance with the Agency's statutes.</p> <p>? As the implementing agency for the project, DGEF will be accountable for project outcomes in collaboration with Island counterparts, will automatically appoint a National Project Director from among its members and chair the Steering Committee, and will allocate adequate workspace for the project management team, including water and electricity;</p> <p>? DGEF will be kept informed of project activities and progress on an ongoing basis; (Output 1; 2; 3; 4)</p> <p>? DGEF will provide leadership for institutional and legislative reforms related to the management of PAs; (sub-outputs 111 year 1; 112 year 1; 113 year 3; 114 year 2; 115 year 1; 116)</p> <p>? DGEF will contribute to project monitoring and evaluation, be responsible for technical and financial reporting to UNDP, and for integrating lessons learned into knowledge sharing networks (Sub-output 421 Years 1-5; 422 Years 1-5)</p>	<p>Meetings; workshops; direct mail</p>	<p>National Project Director</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>The Regional Directorates in charge of the Environment, in charge of Production, and in charge of Fishing in the Islands</b></p>	<p>The Directorates in charge of the Environment at the Island level will be kept informed of the activities and progress of the project on an ongoing basis; are responsible for mobilizing the national in-kind contribution at their level; will be invited to benefit from training in PA co-management and to be involved in negotiations concerning:</p> <p>? Compliance with zoning; (sub-output 121 year 1; 122 years 1-5; 123 year 3)</p> <p>? Resolution of land use and tenure issues; (sub-output 121 year 1; 122 years 1-5; 123 year 3)</p> <p>? Enforcement of regulations in PAs and their resources, resource use and benefit sharing; (Sub-output 111 Year 1, 112 Year 1)</p> <p>? Clarification of land and resource use rights (sub-output 123 year 3)</p> <p>? They will participate in the planning and implementation of interventions at the local level, including the selection of priority intervention areas at the local and community levels; (sub-output 124 year 3)</p>	<p>Meetings; workshops; direct mail</p>	<p>Monitoring of the activities at the island level</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>National Agency for the Management of Protected Areas (Comoros National Parks)</b>	<p>In addition to the missions assigned by its statutes, the Agency's management will focus on, among other things preserve, administer, develop and manage in a sustainable manner the biological diversity and the natural and cultural heritage of the Protected Areas; Coordinate the realization of scientific and socio-economic studies, the negotiations and consultations required for the delimitation, and the resolution of any dispute concerning the current delimitation of the existing PAs; Coordinate the implementation and updating of the development and management plans of the PAs; Plan, coordinate, implement and evaluate the conservation and development activities in the Protected Areas and their Protected and Peripheral Zones; Ensure coherence between the texts governing the Protected Areas and other related texts and propose possible modifications; Develop and maintain the institutional dialogue necessary to ensure the integration of the Protected Areas into the development framework of the Union of the Comoros; Develop technical, scientific, commercial and financial partnerships to achieve the objectives of the Protected Areas and carry out the planned conservation and development activities; Promote the sustainable use of resources and ecotourism activities in sites dedicated to this purpose. (Outcomes 1, 2, 3, 4)</p>	<p>Meetings; workshops; direct mail; Organization; planning; execution; evaluation</p>	<p>Manager of the National Areas System; coordinate activities</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>



Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>Scientific Council of the Comoros National Parks Agency</b>	<p>In collaboration with the management bodies of the Comoros national parks, the scientific council will support the definition of the main focus areas and orientations of the multi-year research programs carried out in the national parks, in particular</p> <p>? Improvement of the knowledge on the natural balances and the relations between the man and his environment;</p> <p>? Application of this research to the management of natural areas and cultural heritage;</p> <p>? Defining Park Development and Conservation Policies;</p> <p>? Ensures the coherence of the different research projects concerning the territory of the National Parks and the dissemination of all related information;</p> <p>? Assists in the establishment of links with research organizations, technical bodies and the academic world, in particular by mobilizing research work on the terrestrial and marine areas of the Parks;</p> <p>? Assistance in the design and implementation of the scientific components of regional, national and international cooperation actions;</p> <p>? Assistance to projects for creating integral reserves;</p> <p>? Inventory and coordination of studies and publications (scientific and/or popularization) carried out by the Park;</p> <p>? Design of long-term environmental monitoring protocols and corresponding databases; (Outputs 2.1, 2.2, 2.4)</p>	<p>Meetings; workshops</p>	<p>Scientific research</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>The mayors of the communes concerned by the protected areas including:</b></p> <p>Coelacanth NP: 5 communes</p> <p>Karthala NP: 10 communes</p> <p>Mitsamiouli-Ndrou? NP: 4 communes</p> <p>Shissiwani NP: 2 communes</p> <p>Mount Ntringui NP: 10 communes</p> <p>Moh?li NP: 6 communes</p>	<p>Representatives of local elected officials will support land tenure studies and provide leadership in land tenure negotiations and conflict resolution; (year 3, sub-output 123)</p> <p>They will act as a relay between the protected area conservationists and the legal services in the context of legal proceedings against people who do not respect the legislation in force in the Comoros national parks; (sub-output 112 year 1)</p> <p>The representatives of local elected officials will be invited to benefit from capacity building in the co- management of PAs and to become involved in the respect of zoning, the application of regulations in the PAs and their resources, the use of resources and the equitable sharing of the benefits derived from them; (sub-output 115 year 1)</p> <p>? They will participate in the planning and implementation of local level interventions, including the selection of local and community level intervention sites. (Sub-output 115 year 1; Sub-output 123 year 3; Sub-output 124 year 3; Sub-output 141 year 2)</p> <p>? They are an integral part of the co-management committees of the national parks and therefore actively participate in monitoring and enforcing the commitments made in each national park. (Sub-output 124 year 3)</p>	<p>Meetings; workshops; direct mail;</p>	<p>Relationship between the village and the parks</p>	<p>The entire duration of the project and more actively in the first two years of the project (delimitation of village lands and demarcation of parks</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>The prefects of the regions or prefectures concerned by the protected areas: (13)</b></p> <p>Ngazidja: Hambou, Mbadjini-Ouest, Mbadjini Est, Oichili, Dimani, Mitsamiouli and Mboinkou;</p> <p>Ndzuani : Sima, Domoni, Ouani, Mutsamudu</p> <p>Mwali : Fomboni, Nioumachoi, Djando</p>	<p>They will support the protected areas in all conflict resolution processes (Output 1.2)</p> <p>They will participate in direct advocacy for the negotiation of benefits and prerogatives that protected areas should enjoy from the State; (sub-output 133 year 1)</p>	<p>Meetings, workshops; mail</p>	<p>Relationship between the village and the parks; advocacy</p>	<p>Entire duration of the project and more actively in the first 2 years of project</p>	<p>Integrated into all project activities</p>
<p><b>University of Comoros (UdC) / Ministry of National Education and Vocational Training</b></p> <p><b>Faculty of Science and Technology</b> (National Herbarium, Master's Degree in Biodiversity Conservation, Laboratory of Animal Biology, University of Technology)</p>	<p>UdC will be closely involved in all aspects of biodiversity training and knowledge development in the project and is expected to be a key partner in the PA system established under this project. (Sub-output 123 Year 3; Sub-output 212 Year 1)</p> <p>UdC will provide expertise in terrestrial ecosystem inventory and baseline mapping; (sub-output 241 year 1)</p> <p>UdC and other scientific institutions will be key players in identifying the needs to make the national biodiversity database even more effective, in identifying priority knowledge needs for biodiversity conservation and management, and in setting up a platform for sharing biodiversity-related knowledge; (Sub-output 211 year 1; Sub-output 213 years 1-5)</p>	<p>Meetings; consultants; workshops; mail; scientific research; inventory</p>	<p>Key partner;</p>	<p>The entire duration of the project and more actively in years 1 and 3 of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>The National Center of Documentation and Scientific Research (CNDRS)</b></p> <p>/ Ministry of National Education and Vocational Training:</p> <p>Research Division, Comoros National Oceanographic Data and Information Centre</p>	<p>The CNDRS will be involved in knowledge development on culture and heritage protection within protected areas and in studies on invasive alien species; (Sub-output 141 Year 2; Sub-output 212 Year 1; Sub-output 225 Year 2)</p>	<p>Meetings; consultants; workshops; mail; scientific research; inventory</p>	<p>Project partner</p>	<p>The entire duration of the project and more actively in years 1 and 3 of the project</p>	<p>Integrated into all project activities</p>
<p><b>The National Research Institute for Agriculture, Fisheries and the Environment (INRAPE) / MAFETH,</b> under the administrative supervision of the Secretary General</p>	<p>INRAPE, through its new reference laboratory, will be associated with all scientific research activities and biodiversity enhancement through the implementation of the NAGOYA protocol (sub-output 212 year 1)</p>	<p>Meetings; workshops; scientific research</p>	<p>Project partner</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>
<p><b>Geographic Information System Unit (GIS)</b> of the DGEF / MAFETH, under the administrative supervision of the Secretary General of MAFETH</p>	<p>The Ministry's GIS will be asked to support protected areas in the operationalization and development of the database and the development of habitat maps of Comoros' protected areas; (sub-output 211 year 1; sub-output 212 year 1; sub-output 213 years 1-5; sub-output 241 year 1)</p>	<p>Meetings; workshops;</p>	<p>Project partner</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>
<p><b>The Comoros Geology Office (BGC) / MAFETH,</b> under the administrative supervision of the Secretary General of MAFETH</p>	<p>The Comoros Geology Office is responsible for authorizing prospecting, particularly for natural gas and oil deposits, (such areas could affect the Mitsamiouli-Ndroud? marine protected area in northwest Ngazidja) and is responsible for overseeing the development of geothermal energy on Karthala as the executing agency for the UNDP- GEF-BAfD-NZ-African Union project. (year 1)</p>	<p>Meetings; workshops;</p>	<p>Project partner</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>National Center for Fisheries Control and Surveillance (CNCSP)</b> / MAFETH, under the administrative supervision of the Secretary General of MAFETH	The fisheries surveillance center is the national parks' partner in marine surveillance. It will be invited to plan and implement coordinated surveillance with law enforcement officers and community-based eco-guards, (sub-output 232 year 3)	Field trips; meetings; workshops; flyers	Project partner	The entire duration of the project	Integrated into all project activities
<b>General Directorate of Fisheries Resources (DGRH)</b> / MAFETH	It will be actively associated with all marine resource management activities, monitoring and evaluation of co-management agreements and marine scientific research. (Sub-output 232 Year 3; Sub-output 241 Year 1; Sub-output 141 Year 2; Sub-output 124 Year 3)	Field trips; meetings; workshops; flyers	Project partner	The entire duration of the project	Integrated into all project activities
<b>Planning, Monitoring and Evaluation</b> Department/MAFETH	? Responsible for review of project technical, progress and evaluation reports; (Sub-output 421 Years 1-5; Sub-output 422 Years 1-5; Sub-output 423 Years 1-5)  ? Participation in the development and implementation of the monitoring and evaluation plan, including contribution to the preparation of the annual <i>Project Implementation Report (PIR)</i> . (Sub-output 421 Years 1-5; Sub-output 422 Years 1-5; Sub-output 423 Years 1-5)	Meetings; workshops;		The entire duration of the project	Integrated into all project activities

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>National Directorate of Tourism, National Office of Tourism / MAFETH</b>	<p>? The Directorate in charge of tourism is a member of the Steering Committee of the project and is already a member of the co-management committees of the Comoros national parks;</p> <p>? Members of the National Protected Areas Agency and the Agency's Board of Directors</p> <p>? Contribution to the planning and implementation of ecotourism activities in PAs/MPAs; (sub-output 311 year 1)</p>	Meetings; workshops;	Partnership	The entire duration of the project	Integrated into all project activities
<b>National Coast Guard / In charge of Defense</b>	<p>? The Coast Guard will contribute to the monitoring of biodiversity and vessel movements in the NPAs and the enforcement of resource use regulations in the NPAs through its ongoing activities to control illegal fishing, (Sub-output 232 Year 3)</p> <p>? The Coast Guard will be invited to receive training on PA co-management (sub-output 124 year 3; sub-output 141 year 2)</p>	Field trips; meetings; workshops; flyers	Partner	The entire duration of the project	Integrated into all project activities
<b>National Development Army (AND) and Gendarmerie / In charge of Defense;</b>  <b>National Police, National Directorate of Civil Security/ Ministry of Interior</b>	<p>? Will be members of the park management team and will be responsible for planning monitoring in collaboration with community-based eco-guards and PA managers.</p> <p>? Participation in PA monitoring and enforcement of applicable laws and regulations. (Sub-output 124 year 3; Sub-output 111 year 1; Sub-output 112 year 1 year 1; Sub-output 113 year 3)</p>	Field trips; meetings; workshops; flyers; communication	Partner	The entire duration of the project	Integrated into all project activities

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>National Directorate of Development and Infrastructure</b> /Ministry of Land Management, Urban Planning, in charge of Land Affairs and Land Transport	It will participate in the completion of environmental impact assessments in all activities requiring EIAs in the project. (Sub-output 311 Year 1)	Meetings; workshops; flyers	Partner	The entire duration of the project	Integrated into all project activities
<b>Land Department / General Administration of Taxes and Estates / Ministry of Finance, Budget and Banking</b>	It will participate in the conduct of environmental impact assessments in all activities requiring EIAs in the project; (Sub-output 311 Year 1)	Meetings; workshops; flyers	Partner	All the duration of the project	Integrated into all project activities
<b>National Budget Directorate / Ministry of Finance, Budget and Banking</b>	It will actively contribute to the whole process of mobilizing internal and external funding for the FEC, including the implementation of green taxes, royalties, and the development of the debt-for- nature option. (Output 1.3 year 1)	Meetings; workshops; flyers; fundraising negotiations	Partner	The entire duration of the project	Integrated into all project activities
<b>National Planning Commission (CNP)</b>	? It will be a member of the project steering committee and as such will ensure that the commitments made are complied with  ? It will monitor project activities from their monitoring and evaluation database and share the information collected at the level of their government platform; (sub-output 421 years 1-5; sub-output 422 years 1-5)	Meetings; workshops; flyers	Partner	The entire duration of the project	Integrated into all project activities

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>Court of First Instance, Court of Appeal</b> / Ministry of Justice, Islamic Affairs and Public Service, in charge of Human Rights, Transparency and Public Administration	<p>? It will provide swearing-in of eco-guards and training in the procedures required to enforce the Protected Areas Act; (sub-output 111 year 1; sub-output 112 year 1; sub-output 113 year 3)</p> <p>? It will participate in meetings to raise awareness of the players on compliance with the required regulations (sub-output 113 year 3)</p> <p>? It will conduct trials of all persons found to have violated protected area regulations; (Sub-output 111 Year 1; Sub-output 112 Year 1; Sub-output 113 Year 3)</p>	Flyer; posters	Partner	The entire duration of the project	Integrated into all project activities
<b>National Gender Commission</b> / Ministry of Health, Social Protection and Gender Promotion	<p>The National Gender Commission will be directly involved in gender promotion activities and the involvement of women, youth and people living with disabilities in project activities; to this end, it will participate in the drafting of the Gender and PLWD Action Plan and its implementation; (sub-output 411 years 1-5; sub-output 412 years 2-5)</p>	Meetings; workshops; flyers; field trips	Partner	The entire duration of the project	Integrated into all project activities



Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>Rural Economic Development Centers (CRDE)</b> (Mibani, Mledjele, Fomboni in Mwali, Bamba and Bougweni in Ndzuani, Simboussa, Serehini, Sembenoi in Ngazidja)</p>	<p>They will be called upon to:</p> <p>? Planting of seedlings needed for reforestation and training of park agents in monitoring the seedlings; (sub-output 141 year 2; sub-output 224 year 2;</p> <p>? The participation of CRDEs in the implementation of management and development plans</p> <p>? In accordance with their mandate, the CRDEs will work closely with each PA to ensure compliance with environmental and natural resource management laws and regulations, with the collaboration, when necessary, of the police and gendarmerie</p> <p>? ensure reforestation of degraded areas (sub-output 141 year 2; sub-output 224 year 2)</p>	<p>Meetings; workshops; flyers; field trips</p>	<p>Project partner</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>
<p><b>ANACEP (National Agency for Project Design and Implementation)</b> / Ministry of Finance, Budget and Banking</p>	<p>It will be a member of the project steering committee and will participate in the monitoring of the project's performance</p> <p>It will report project information into the project management information and record system.</p> <p>It will provide technical assistance and help the project update the information on their database; (Sub-output 421 Years 1-5; Sub-output 422 Years 1-5; Sub-output 423 Years 1-5)</p>	<p>meetings; workshops; flyers; reports</p>	<p>Project partner</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>National Waste Management Agency/ MAFETH</b>	It will be called upon to support the project in the management and transformation of waste, in the promotion of the circular economy resulting from waste management; It is a member of the steering committee of the project; (sub-output 212 year 1; sub-output 224 year 2)	Meetings; workshops;	Project partner	The entire duration of the project	Integrated into all project activities
<b>National Agency for Investment Promotion (ANPI)/ Ministry of Economy, Investment, Energy, in charge of Economic Integration, Tourism and Handicraft</b>	The National Investment Promotion Agency will assist the project and the beneficiaries of the livelihood activities in the development of IGAs, training of beneficiaries in entrepreneurship, financial management and sustainability of investments; (Output 3.1) (years 1 to 5)	Meetings; workshops; flyers;	Project partner	The entire duration of the project	Integrated into all project activities
<b>National Agency of Civil Aviation and Meteorology (ANACM)/ Ministry of Maritime and Air Transport</b>	ANACM will provide forecasts (tide tables) that will allow planning of turtle monitoring activities, as well as monitoring of all marine and coastal resources that require field and sea trips. In the event of natural disasters, it will warn protected area managers of the areas that will be affected; (sub-output 124 year 3; sub-output 211 year 1)	Newsletters	Project partner	The entire duration of the project	Integrated into all project activities
<b>Legislative Institutions / Members of the National Assembly</b>	? They will be responsible for the adoption of improved legal and regulatory tools for sustainability, biodiversity and local community rights through the development of implementing legislation specifying responsibilities and prescribed processes)  ? They will be responsible for the adoption of texts relating to the definition of taxes, fees in the PAs and the budget allocated to the PAs;  ? They will participate in the operationalization of the FEC (sub-output 111 year 1)	Newsletters; flyers	Adoption of legal tools	The entire duration of the project	Integrated into all project activities

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>National Focal Points (NFPs)</b> for the conventions on Biodiversity, Climate Change, Combating Land Degradation, Ramsar, CITES, and the Nagoya Protocol</p>	<p>? The Nagoya Focal Point will be asked to implement the Law on Access and Benefit Sharing and its benefits for local communities;</p> <p>? NFPs will contribute to the sharing of knowledge on biodiversity in PAs on the website and focus efforts on implementing AMEs in Comoros national parks; (sub-output 423 years 1-5)</p> <p>? NFPs will be encouraged to implement and enforce laws and policies governing protected areas; (Output 111 Year 1; Output 115 Year 1</p>	<p>meetings; workshops; flyers;</p>	<p>Project partners</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>Major users of natural resources at PA sites whose activities are sustainable and consistent with PA management plans</b></p> <p>Major users of natural resources at PA sites whose activities are not sustainable or consistent with PA management plans</p>	<p>? They will actively participate in the appointment of community representatives to co-management committees and will be represented in working sessions and negotiations concerning the implementation of PA co-management agreements, and concerning the use of natural resources; (Sub-output 115 Year 1)</p> <p>? They will actively participate in cluster monitoring and ecosystem restoration activities planned by the community engagement specialists; (Sub-output 212 Year 1)</p> <p>? As signatories of the co-management agreements through their delegates, they will participate in the respect, revision and implementation of the co-management agreements with each village community; (sub-output 115 year 1; sub-output 124 year 3)</p> <p>? They will be involved in biological, socio-economic, and land tenure studies for the physical delineation of national parks, ownership of the state of biodiversity in the parks; (sub-output 121 year 1; sub-output 122 years 1-5, sub-output 123 year 3)</p> <p>? They will benefit from livelihood activities, with priority given to those directly affected by the establishment of national parks; (sub-output 311 year 1; sub-output 341 year 2; sub-output 361; sub-output 362)</p> <p>? They will work directly with the private sector to develop win-win partnerships in resource utilization, ecotourism development and sustainable fisheries; (Sub-output 331 Year 1; Sub-output 332 Year 2;</p> <p>? They will act as guides for park visitors and for scientists conducting field research</p>	<p>Meetings; workshops; flyers; field trips; newsletter;</p>	<p>Key players in the project</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>Opinion leaders in the community:</b> elders, religious leaders, youth, men and women, village leaders</p>	<p>? They will be invited to participate in local information and awareness-raising meetings on the importance of biodiversity protection, negotiations on the use of land and marine resources; (sub-output 113 year 3; sub-output 231 year 2)</p> <p>? They will be encouraged to formalize important events and celebrations related to national parks; (sub-output 431 years 1-5; sub-output 432 years 1- 5)</p> <p>? They will be privileged interlocutors in the resolution of land issues in collaboration with the communes and the managers of the protected areas; (sub-output 121 year 1; sub-output 122 years 1-5; sub-output 123 year 3)</p> <p>? Religious leaders and elders will be invited to participate in the conflict resolution platforms set up in each park, to advise and intervene in the resolution of local resource conflicts related to PAs and their resources and, if necessary, in the enforcement of regulations. (sub-output 112 year 1; sub-output 115 year 1; sub-output 123 year 3)</p>	<p>Meetings; workshops;</p>	<p>Actors</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>Local NGOs and environmental associations In</b></p> <p>Ngazidja : ULANGA Ngazidja, ULANGA village associations; AIDE; Comoflora; Association for the Preservation of Gombessa; Friends of Nyumbadju; Friends of Karthala; Junior Chamber International; Banda Bitsi; MAEECHA; Association 2 mains; Women Sustainable Development and Food Security Platform; Ngoshao; Ngo Moringa; Fischerwomen Group of the Coelacanth Park and Mitsamiouli ? Ndroud? Park; Ngazidja Ecotourism House; MOIDJIO;</p> <p>In Mwali: ULANGA association, village development associations, Association of Innovation and Research for Development, House of Ecotourism, the Women and Development Network;</p> <p>In Ndzuani: Organization for the Integrated Management of Natural Resources in Ndzuani, Action Comores; Dahari; ARAF; UMAMA; Mtroumch? Mchisiwani Women's Association, NGO Moringa</p>	<p>All NGOs will actively participate in the:</p> <p>? Assessments of threats to protected areas and management effectiveness and reflection of the socio-economic benefits of ecosystem services; (Sub-output 221 Year 3; Sub-output 222 Year 2; Sub-output 223 Year 2)</p> <p>? Monitoring and evaluation of protected area management and development plans (sub-output 421 years 1-5)</p> <p>? Implementation of comprehensive ecosystem monitoring plans; (Sub-output 232 Year 3)</p> <p>? Information and awareness-raising activities on the co-management of PAs and community mobilization for development work in PAs; (sub-output 224 year 2; sub-output 225 year 2)</p> <p>? Participatory biodiversity monitoring and research (i.e. monitoring of PA conservation targets, including fruit bats, sea turtles, coral reefs); (sub-output 241 year 1)</p> <p>? Community outreach and mobilization for all project interventions; (sub-output 432 years 1-5)</p> <p>? Capacity building for PA management stakeholders and sharing of best practices for biodiversity inventories, long-term monitoring and conservation activities.</p> <p>? To environmental education for the benefit of students; (sub-output 432 years 1-5)</p>	<p>meetings; workshops; flyers; field trips, newsletters, training, restoration operations; monitoring</p>	<p>Key players</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>Community-based organizations</b></p> <p>Village development associations</p> <p>The Unions of Water Committees of Anjouan and Moheli (UCEA and UCEM) and the village committees</p>	<p><u>Village co-management committees of national parks will be invited to participate in</u></p> <p>? Planning activities that will be carried out directly in their respective villages</p> <p>? all ecosystem restoration operations; (sub-output 224 year 2; sub-output 225 year 2;)</p> <p>? Grouped surveillance operations that will be planned in the villages and in the marine and terrestrial village territories; (sub-output 233 year 3)</p> <p>? Training to strengthen protected area governance and monitoring of protected area conservation targets; (sub-output 115 year 1; sub-output 321 year 2-5; sub-output 322 year 3)</p> <p>? The process of physically demarcating national parks and placing signage in important protected area lands and sites; (sub-output 121 year 1; sub-output 122 years 1-5)</p> <p>? Negotiations on the use of land and marine resources; (sub-output 123 year 3)</p> <p>Implementation of management and development plans</p>	<p>Meetings; workshops; flyers; field trips, newsletters, training, restoration operations</p>	<p>Key players in the project</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>Village co-management committees</b> for national parks set up in each village co-managing protected areas</p>	<p>The village committees are signatories to the</p> <p>To the planning of activities that will be directly done in their respective villages;</p> <p>To all ecosystem restoration operations, (sub-output 224 year 2; sub-output 225 year 2)</p> <p>Grouped surveillance operations that will be planned in the villages and in the marine and terrestrial village territories; (sub-output 233 year 3)</p> <p>Training to strengthen protected area governance and monitoring of protected area conservation targets; (sub-output 115 year 1; sub-output 321 year 2-5; sub-output 322 year 3)</p> <p>The process of physically demarcating national parks and placing signage in important protected area lands and sites; (sub-output 121 year 1; sub-output 122 years 1-5)</p> <p>Negotiations on the use of land and marine resources; (sub-output 123 year 3)</p> <p>Implementation of management and development plans.</p>	<p>meetings;</p> <p>workshops;</p> <p>flyers; field trips, newsletters, training, restoration trips</p>	<p>Key players in the project</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>



Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>The co-management committees (steering committee) of the following National Parks:</b></p> <p><b>Management Committee of the National Park of Moheli</b></p> <p><b>(6 committees)</b></p>	<p>Co-management committees will be invited to actively participate:</p> <p>? In outreach sessions, environmental education in parks; (Sub-output 432 Years 1-5)</p> <p>? In the monitoring of co-management agreements negotiated with village communities (sub-output 115 year 1; sub-output 124 year 3)</p> <p>? Engage communities in all ecosystem restoration and park development activities (sub-output 224 year 2; sub-output 225 year 2)</p> <p>? Mobilize communities to respect legislative measures and to negotiate and resolve conflicts of use and land conflicts (sub-output 111 year 1; sub-output 112 year 1; sub-output 113 year 3)</p>	<p>meetings; workshops; flyers; field trips, newsletters, training, restoration trips</p>	<p>Key players</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>
<p><b>International NGOs</b></p> <p>IUCN, WWF, WCS, CI, WIOMSA, IRD, CIRAD, Madagascar National Parks, Durrel Foundation, Blue Ventures, FAPBM, Monaco Foundation (Not represented in Comoros)</p>	<p>The project will support the establishment of long- term partnerships between the Comoros National Parks Management Agency and major international environmental NGOs, mainly to support the development of the capacities of conservation actors, the development of knowledge on biodiversity for their conservation and sustainable management, and for the implementation and capitalization of the FEC; (sub-output 133 year 1)</p>	<p>Newsletters; reports</p>	<p>Partners</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>Comoros Environment Fund (FEC)</b>	<p>The FEC will be a key player in the project and will provide leadership for the activities identified to achieve Output 1.3, in close collaboration with the new National Park Agency, including: Development of an Enabling Legislative Framework for FEC and Resource Mobilization;</p> <p>FEC's strategic planning to diversify, multiply and increase realistic short- and long-term funding sources, so as not to be dependent on a single funding source or mechanism; Mobilization of financial resources from international donors and the establishment of new financial mechanisms for conservation Mobilization of the necessary partnerships; Development and implementation of the FEC's communication strategy The interface role between donors/foundations and Comoros National Parks; (Output 1.3) Years 1-5</p>	Meetings; workshops	Key player in the project	The entire duration of the project	Integrated into all project activities
<b>DIASPORA</b>	<p>They will participate in:</p> <p>Mobilizing resources to fund management and development plans;</p> <p>The mobilization of South-South and North-South partnerships necessary for the sustainability and operationalization of Comoros' protected areas; (sub-output 133 year 1; sub-output 134 year 1)</p> <p>They represent the primary source of local tourism when they return home either for their big wedding or to visit family;</p>	Newsletters; flyers	Partner	The entire duration of the project	Integrated into all project activities

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>Media:</b> Local and national radio and television stations broadcasting in the project intervention regions (ORTC), including electronic newspapers</p> <p>Print media: Al-Watwan, Gazette des Comores, Massiwa; online newspapers (Habari Za Comores, Comores infos, Hayba FM, Facebook FM)</p>	<p>? Partnership agreements will be established between the media and the Comoros National Parks Agency. They will be invited to:</p> <p>? Disseminate at the national and community levels environmental awareness and education campaigns, microfilms promoting protected areas and ecosystem restoration campaigns;</p> <p>Disseminate the main events of the project and according to the communication plan: launching of the project, formal approval of texts governing protected areas, ceremonies and festivities related to PAs and biodiversity in Comoros, (e.g. Environment Day, Turtle Day, Livingstone's Bat Day, etc.),</p> <p>? Information on the progress and key outcomes of the project, invitations to tender and job offers,</p> <p>? Encouraging the public to participate in major chores (e.g. beach and coastal clean-ups, watershed reforestation, etc.) related to biodiversity and the environment, broadcasting programs, environmental columns and thematic articles.</p> <p>? sub-output 431 years 1-5; sub-output 432 years 1-5</p>	<p>Newsletters; flyers; workshops, meetings</p>	<p>Partner</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>
<p><b>The national private sector: National Electricity Company (SONELEC)</b></p>	<p>It will participate in negotiation meetings, allow local communities to benefit from ecosystem services (Sub-output 311 year 1)</p>	<p>Newsletters; flyers</p>	<p>Key player in the project</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>National Company of exploitation and distribution of water (SONEDE)</b>	SONEDE will contribute to the planning and support of reforestation activities within the watersheds to reduce sedimentation that affects facilities and maintain stream flows; (Output 114 Year 2; Output 225 Year 2)	Newsletters; flyers, forest ecosystem restoration operations	Partner	The entire duration of the project	Integrated into all project activities
<b>UCCIA</b> (Union of Chambers of Commerce of the Comoros), the Chambers of Commerce of the islands (Ndzواني, Mwali and Ngazidja), the Federation of the Comorian private sector, the <b>MODEC</b> (Movement of Comorian enterprises),  <b>SYNACO</b> (National Union of Comorian Traders),  <b>OPACO</b> (Employer organization of Comoros companies);	UCCIA, MODEC, SYNACO, OPACO, Women's Entrepreneur Platform and others are public institutions of a professional nature, with legal status and autonomous management that deal with information, sensitization and training of local stakeholders on issues related to agriculture, trade, natural resource management, etc. As they are organized at the island, national and regional levels, they will play an important role in supporting communities to develop profitable value chains; (sub-output 141 year 2; sub-output 311 year 1; by-product 331 year 1; sub-output 332 year 2; by-product 351 years 2-3; sub-output 352 years 3-5)	Newsletters; flyers; meetings; workshops	Project partner	The entire duration of the project	Integrated into all project activities

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<p><b>Tourist operators and agencies</b></p> <p>(ECOMASSIWA, Ylang Tour Travel Agency 442.62.13, Comores Tour 357.75.47, Rogers Aviation Comores) Hotels and bungalows in and around the PA sites</p> <p>Mwali: Laka Lodge, community lodging structures at the village level, hotels and boarding houses in Fomboni</p> <p>Ndjuani: hotels and boarding houses in Mutsamudu, Domoni and Ouani Ngazidja: hotels and boarding houses in Moroni, Mitsamiouli and Itsandra</p> <p>Air and sea transport companies International Aviation:</p> <p>Kenya Airways, Air Madagascar, Ethiopia Airlines, Ewa Air (Mayotte), Air Tanzania</p> <p>Comorian Aviation: Inter- Iles, AB Aviation and R- Comores</p> <p>Shipping companies (agencies based in Ngazidja, Mwali and Ndzuani: various passenger, freight and transit companies)</p>	<p>Specific information and awareness-raising activities will target private companies and investors operating in PA sites or likely to move there, with a view to improving their services, mitigating the impacts of their activities on PAs and their resources, and developing PA-friendly activities.</p> <p>Operators and tourists will be involved in consultations leading to the development of a pragmatic strategy for the development of ecotourism in relation to PAs and will participate in its implementation; (sub-output 311 year 1; sub-output 321 year 2-5; sub-output 322 year 3; by-product 331 year 1; sub-output 332 year 2)</p>	<p>Newsletters; flyers, meetings, workshops</p>	<p>Key actors in the project</p>	<p>The entire duration of the project</p>	<p>Integrated into all project activities</p>

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>National Fishermen's Union</b> (all the fishermen's cooperatives of all the fishermen's villages)	<p>They will participate in the negotiations for the establishment of "No-take zones" and temporary closure zones, as well as the monitoring of marine areas;</p> <p>They will support the marine protected areas management unit in raising awareness to combat prohibited activities; (sub-output 432 years 1-5)</p> <p>They will participate in the negotiations for the establishment of No Take Zones and Temporary Closure Zones, as well as the monitoring of marine areas; (Sub-output 212 Year 1)</p> <p>They will support the marine protected areas management unit in raising awareness to combat prohibited activities; (sub-output 115 year 1)</p>	Meetings, workshops; supervision visits;	Project partners		Integrated into all project activities
<b>Telecommunications operators (Comores Telecom and Telma)</b>	Telecommunications operators play a major role in enabling the communications necessary to raise public awareness and monitor the activities of the PA network; (Sub-output 431 Years 1-5)	Newsletters; flyers	Partners	Entire duration of the project	Integrated into all project activities

Stakeholder Group	Roles in the project	Method of participation	Method		Estimated costs
			Resp.	Timeline	
<b>Traders of biodiversity products and private biodiversity enterprises</b> - Comores Plong?e (Itsandra in Ngazidja) Laka Lodge (Diving center in Mwali) - Comoros Moringa (collection, processing, marketing for food and as a medicinal plant) - Massala D?lices (processing and blending of Comorian spices from forests and natural environments) - Maya Beaut? et Cosm?tiques (massage and body care oils with local essential oils) - Hazi ya Comores (retailer of artisanal products made from natural products) - Bio Mdjissa et cosm?tiques (marketing of natural Comorian cosmetics and beauty products 100% organic) - La Petite F?e (making jewelry with shells and beads)	They will work closely with local communities to develop value chains; They will participate in ecosystem restoration operations; They will contribute to feasibility studies for the development of targeted value chains; They will participate in the consolidation of cooperatives or community associations and the development of the capacities of local community members through local support in microfinance, savings and loans, investment, risk management and micro-entrepreneurship; They will contribute to the identification and implementation of processes and mechanisms needed to ensure that tangible and optimized benefits accrue to the value chain partner communities; (sub-output 311 year 1; sub-output 321 years 2-5; sub-output 322 year 3; sub-output 331 year 1; sub-output 332 year 2; sub-output 341 year 2; sub-output 351 year 2; sub-output 352 (years 3-5); sub-output 361 (years 2-3); 362 (years 3-5)	Newsletters; flyers; meetings; workshops	Direct beneficiaries	The entire duration of the project	Integrated into all project activities

Taking into account the views of women and people living with disabilities and facilitating their participation

The project will pay particular attention to women, people living with disabilities and marginalized minority groups. Women continue to be marginalized in public meetings. They do not dare to speak

freely except for those who are educated and who regularly rub shoulders with men in offices. People living with disabilities are totally ignored because their parents do not even let them go outside. The project will focus on this group in livelihood activities and will endeavor to invite them to all meetings and trainings related to biodiversity management in protected areas. A special Gender and PLWD action plan will be developed and implemented to facilitate their integration and effective involvement. The project will recruit a full-time gender and PLWD officer to ensure that they are adequately integrated into all activities that affect them and that they have a fair share of the benefits.

Methods used for receiving feedback and ensuring ongoing communication with stakeholders (apart from formal consultation meetings)

At the level of each protected area management unit, a grievance book will be made available to the communities and to all stakeholders; they will be informed of it and will be able to write their grievances directly in it. Moreover, during the meetings of the co-management committees and village committees, awareness will be raised so that the project actors and stakeholders can communicate their grievances; the committees will identify them and forward them directly to the protected area conservators and the agency's management for consideration. Those who have registered grievances will be met with the aim of explaining to them how the project plans to address them.

Other engagement activities, including participatory processes, joint decision-making and/or partnerships with local communities, NGOs or other project stakeholders.

The entire project is designed to be implemented in a participatory manner. The type of protected area management advocated in Comoros is a co-management and this method of governance is reflected at all levels of the project. Communities are involved in decision-making as well as the implementation and evaluation of protected areas, and the project supports the communities for them to play this role fully. The project will formalize a range of partnerships with institutions and work directly with technical services, NGOs and scientific institutions to support the implementation of management and development plans which are designed with the participation of all relevant stakeholders. Local communities will be fully involved (mainly on a voluntary basis) and will take part directly in group surveillance trips and ecosystem restoration operations. They will be trained in conservation target monitoring protocols to ensure that they are empowered and have the skills to actively participate in the conservation of biodiversity in the protected areas.

## **6. Timeline**

The timeline for the various stakeholder engagement activities, including consultation, disclosure and partnerships, is set out in the project activity description and in Table A.

## **7. Resources and responsibilities**

The responsibility for carrying out the specified stakeholder engagement activities is outlined in the project activity description and also in Table A.

The budget and resources for stakeholder engagement are included in the implementation of the activities

Community engagement experts are recruited from the National Protected Areas Management Agency as stakeholder engagement facilitators for each of the PAs and will be involved throughout the project to support any stakeholder engagement activities. Their coordination at the national level within the project will be ensured by the Communication/Knowledge Management Officer and by the National Project Coordinator.

## **8. Grievance redress mechanism**

In addition to formal consultation meetings, the project will support the establishment of a compliance monitoring and conflict prevention/management mechanism. The project will establish a Grievance Redress Mechanism (GRM) at the project level, in line with mandatory social and environmental standards for all UNDP projects and programs as well as UNDP accountability mechanisms that include the Stakeholder Response Mechanism (SRM) and the Social and Environmental Compliance Unit (SECU) as additional means of redress, and will ensure that the stakeholders are informed of their availability.



A GRM is designed to enable collaborative problem solving, as a "first line" of redress for situations where, despite proactive stakeholder engagement, some stakeholders are concerned about the potential impacts of the project on them. A GRM is intended to be accessible, collaborative, timely and effective in resolving issues through dialogue, joint fact-finding, negotiation and problem-solving. For the GRM to be effective in resolving stakeholders' grievances, it will be designed according to the following guiding principles in order to be:

- legitimate (allowing for trust between stakeholder groups)
- accessible (known by all stakeholder groups)
- predictable (clear and known procedure);
- fair (affected parties have reasonable access to sources of information, advice and expertise necessary to engage in the grievance redress process in a fair, informed and respectful manner)

? transparent (parties are informed of progress made); rights-based; allowing for continuous learning; and based on engagement and dialogue

A grievance redress mechanism will include the following steps:

1. Communication of grievances through various channels and the recording of grievances;
2. Recognition of the grievance communicated;
3. The assessment of the eligibility of the issue to the GRM;
4. The assigning of responsibility to the most appropriate institution or person
5. The development of a proposed response;
- vi. Communicating the proposed response to the complainant and seeking agreement on the response;
- vii. Implementation of the response to solve the grievance;
8. The review of the response in case of failure; and
- ix. The closure of the grievance in case the response has been positive or the referral of the grievance in case it has not been resolved.

The grievance prevention/management mechanism will consist of the establishment of a window for all stakeholders, especially, local communities to register grievances or disputes relating to the implementation of the project in general and the application of regulations in the PAs. The mechanism will define the procedures to be used for managing conflicts at different levels: village, communal, protected area and island levels. These procedures may be based on those used by other development projects to manage negative social impacts, including impacts at the community level resulting from the implementation of natural resource or land management interventions at the local level.

The SRM is established to ensure that individuals, peoples, and communities affected by the projects have access to appropriate conflict resolution procedures to hear and resolve project-related grievances and disputes. The SRM assists project-affected stakeholders, UNDP partners (governments, NGOs, and companies) and others to jointly resolve grievances and disputes about the social and/or environmental impacts of UNDP-supported projects. The SRM is available when stakeholder engagement processes at the project level of the implementing partner and UNDP have failed to resolve issues. UNDP country office management normally leads the response to the stakeholder; a function at headquarters level also supports the SRM. The Social and Environmental Compliance Unit (SECU) investigates cases of alleged non-compliance with environmental and social standards and the Screening Procedure. It makes recommendations to remedy proven cases of non-compliance.

In addition, provide a summary on how stakeholders will be consulted in project execution, the means and timing of engagement, how information will be disseminated, and an explanation of any resource requirements throughout the project/program cycle to ensure proper and meaningful stakeholder engagement

**Select what role civil society will play in the project:**

**Consulted only;**

**Member of Advisory Body; Contractor; Yes**

**Co-financier; Yes**

**Member of project steering committee or equivalent decision-making body; Yes**

**Executor or co-executor;**

**Other (Please explain)**

### **3. Gender Equality and Women's Empowerment**

**Provide the gender analysis or equivalent socio-economic assesment.**

#### **Gender analysis**

This gender analysis rendered some overarching findings with regards to gender relations in the Comoros that may vary slightly across project sites. They are presented below along the three areas of interest: situational context, activity profile, and access and control profile.

#### **Situational Context**

In 2018, the Comoros had a total population of approximately 830,000. About 49.6% were female ? a figure in line with data on the female population globally.[1]<sup>1</sup> Out of the total number of households in the country, 40.2% are identified as female-single-parent headed households. This is a very high share, especially when compared to the 2.8% of households that qualify as male-single-parent headed households.[2]<sup>2</sup> Across the globe, female-headed households are generally understood as particularly vulnerable, and this also applies to the Comoros: analysis by gender indicates that 68.2% of the households supported by women have a lower standard of living than households headed by men with the same level of qualifications and professional credentials. Further, particularly vulnerable in the Comoros are households with little or no land, single women, women who have not attended school, and ? as expected ? single parent households headed by women.[3]<sup>3</sup>

Overall, high quality data on the Comoros are rather scarce. What is known is that the 2018 literacy rate of men aged 15 and above (65%) is higher than that of women (53%),[4]<sup>4</sup> and ? with regards to the employed population below the international poverty line ? women (19.9%) make up a higher share than men (13.4%).[5]<sup>5</sup> Further data indicate that the country ranks low on important gender indices: the Women, Business and Law Index measures how laws and regulations affect women?s economic opportunity. The index score for Comoros in 2019 was 58.8, which reveals significant improvements

---

when compared to the scores of 43.8 in 1985 and 2012, and 56.3 in 2013.[6]<sup>6</sup> Cross-country comparisons however show that this score is still below that of the vast majority of countries.

UNDP's Gender Inequality Index is a composite measure to quantify the loss of achievement within a country due to **gender inequality** based on three dimensions: reproductive health, empowerment, and labor market participation. In 2018 and out of 189 countries for which data are available, Comoros ranked 152 on this index.[7]<sup>7</sup> The Gender Development Index (GDI) – another index produced by UNDP – measures gender gaps in human development achievements by accounting for disparities between women and men in three basic dimensions of human development, namely health, knowledge and living standards. The GDI is the ratio of the Human Development Index (HDI) calculated separately for women and men using the same methodology as in the HDI and is a direct measure of gender gap showing the HDI for women as a percentage of the HDI for men. In 2018, Comoros ranked 156 out of 189 countries for which data are available,[8]<sup>8</sup> and a direct comparison of the HDI value (0.538 in 2018) and the GDI value (0.888 in 2018) and the gap between these values confirms a loss of human development due to gender inequality.

Comparisons with other Island States, such as the Seychelles, Mauritius, and Cape Verde additionally confirm that the Comoros lacks behind with regards to GEWE.[9]<sup>9</sup> Indeed, gender – as measured by the Ibrahim Index of African Governance – was one of the areas in which the country scored worst in 2017 (36.3/100).[10]<sup>10</sup>

Despite the shortcomings these data reveal there is a great willingness in the Comoros to work towards greater GEWE, with the country being a signatory to major global conventions and frameworks focused on gender equality and women's empowerment (GEWE). Most importantly, this includes the Convention on the Elimination of All Forms of Discrimination (CEDAW), which the Comoros ratified in October 1994.[11]<sup>11</sup> CEDAW is informally thought of as an international "women's bill of rights": it is exclusively devoted to GEWE, legally binding, and thus a defining document in gender equality work. CEDAW's prime objective is the prohibition of all forms of discrimination against women.

Although not legally binding, representatives from the Comoros have also adopted the Beijing Declaration and Platform for Action in 1995. This Declaration is often seen as complementary to, and a strengthening of CEDAW. It recalls and embodies the same rights and principles as those enshrined in instruments such as the Universal Declaration of Human Rights and dedicates one of its twelve critical areas of concern specifically to women and the environment. At the regional level, the Comoros ratified the African Union Convention on Protocol to the African Charter on Human and People's Rights on the Rights of Women in Africa (the so-called Maputo Protocol). The Maputo Protocol was adopted by the African Union and went into effect in 2005. It guarantees comprehensive rights to women, including in the area of environment.[12]<sup>12</sup>

At the national level, the Comorian Constitution enshrines the principles of fundamental rights and equality of citizens before the law, without distinction of race, sex, religion, and political belief; it assures all citizens the full enjoyment of fundamental freedoms. The original National Gender Strategy ("Politique Nationale d'Equit? et d'Egalit? de Genre, PNEEG) reiterates this: prepared in 2007, the Strategy puts foci on gender, economy, and poverty; gender and social sectors; gender and education; gender, rights, and participation in decision-making; and gender and institutional mechanisms. While the original PNEEG does not include any specific references to gender and the environment, it covers a passage on women's (decreasing) employment in the agricultural sector. Its updated version from 2017

---

is structured in a similar way, but expanded its scope and added sections, including on issues such as gender and violence. The updated version also includes sections that spell out some of the gender dimensions of the environment sector, such as the problem of environmental degradation and its disproportionate effect on women, including due to an increased risk of disease and reduced time for productive tasks. The updated version of the National Gender Strategy also highlights the need for policies addressing sustainable development and environmental protection to integrate gender considerations.[13]<sup>13</sup>

The Comoros also developed a Poverty Reduction and Growth Strategy which includes a gender perspective,[14]<sup>14</sup> and a specific Women's Entrepreneurship Master Plan was prepared in 2013.[15]<sup>15</sup> Distinct regulations, policies or laws with a specific focus on gender and the environment in general and gender and biodiversity in particular are not publicly accessible.

The Comoros has a combined governmental body (vs. full-fledged Ministries) working on GEWE and supporting the implementation of the above-mentioned laws, policies and plans: the Ministry of Health, Solidarity, Social Cohesion, and Gender Promotion addresses issues related to GEWE. Furthermore, each government ministry has a Gender Focal Point. The government also established a General Directorate for Women Entrepreneurship (Direction G?n?rale de l'Entrepreneuriat F?minin) to provide orientation and support to women associations.[16]<sup>16</sup> Aside from governmental efforts, women's associations (active in areas such as health and education) play an important role in Comorian society: they are key in working towards greater GEWE and undertake important advocacy and awareness raising work.[17]<sup>17</sup> Women's associations can help with the collection of relevant data, in organizing women, including for capacity building purposes, and in mobilizing funding. In the Comoros as elsewhere, women's associations play an important role in building sustainable, equitable and peaceful societies and thus present important stakeholders and are understood as a key engine of local development.[18]<sup>18</sup>

The Comoros is both a matrilineal society and a country in which Islam is the dominant religion. This poses the question how the patriarchal type of normative framework is integrated into society?[19]<sup>19</sup> Generally, religion has a strong influence on gender roles, including in the Comoros, and women enjoy an overall lower status than men and assume different roles in society. However, there is some openness in Comorian society due to matrilineal traditions, manifesting for instance in women's decision-making power within the family and their increasing participation in the labor market.[20]<sup>20</sup>

### **Activity Profile**

As mentioned, the national law in the Comoros mandates non-discrimination on the basis of sex in employment, covering recruitment, hiring, terms and conditions, promotions, training and termination. The law also mandates equal remuneration for work of equal value. In practice, however, the traditional division of labor prevails in the country and women are overall disadvantaged in the labor market, which manifests in various ways: for instance, unemployment constitutes a great issue in the country, and the unemployment rate among women is almost twice as high as that of men.[21]<sup>21</sup> Furthermore,

---

while employed men and women have practically the same level of education, they experience a large gap between their incomes, with men earning significantly more than women.[22]<sup>22</sup>

While women's labor force participation has increased over the course of the last decades,[23]<sup>23</sup> women are mostly employed in precarious and informal jobs, with a comparatively large share working in the agriculture sector. The low level of formal employment of women is linked to their roles and responsibilities in Comorian society as housewives.[24]<sup>24</sup> Societal discrimination against women is most apparent in rural areas: there, women are largely limited to farming and child-rearing duties and enjoy even fewer opportunities for education and paid employment.[25]<sup>25</sup> Women are also responsible for tasks such as collecting firewood and fetching water. As forest resources become depleted (e.g., due to deforestation to manufacture charcoal and cultivate bananas and cassava ? activities women are engaged in) and climate change effects manifest, women are likely to require more time for these tasks, adding to their time and poverty which, in turn, may decrease time available for income generation.[26]<sup>26</sup>

As the above indicates, labor market participation and nature of employment in the Comoros are sharply gendered. A closer look at the employed population in the country generates the following findings: out of those employed between 15 and 64 years of age, women make up 38.6%. With regard to women's engagement in specific sectors it can be said that, by and large, they rarely take on physically challenging activities, such as jobs in the construction sector (2.9%); fishing, fish farming, and aquaculture (4.4%), collection, treatment, and distribution of water (0.8%); and transport (4.9%).[27]<sup>27</sup> Rather, the majority of employed women in the Comoros is engaged in the production of clothes (85.8%) or has jobs related to household services (74.4%), in the agri-food sector (67.2%), retail trade (64.4%), performs other repair services (59.7%), engages in wholesale trade (54.9%), or works in hotels and restaurants (51.1%). In the non-agricultural informal sector (traders, micro-entrepreneurs and self-employed people included), women hold 19.5% of the jobs.

Within the agricultural and food security sectors ? sectors of great relevance in the context of biodiversity ? women are mainly involved in food and market garden production, and poultry farming. They also undertake cash crop production with less involvement in the marketing aspects, unlike in fishing where they are responsible for the sale of fish. With regard to the fisheries sector in particular it must be noted that women are not the prime actors; as in most countries, it is mainly men who catch the fish and women engage in tasks such as drying of fish and selling the product on the market.[28]<sup>28</sup> Indeed, women are very active in the conservation and marketing of fishery products such as marine fish, shrimp, octopus, seafood, and alike. However, the high costs related to conservation equipment (e.g., freezers and electricity) in combination with the low coverage of the existing electricity network prevent many women from long-term engagement in these activities: some find themselves forced to turn away and find alternative options for income generation, such as the production of oil extracted from Ylang-ylang.[29]<sup>29</sup> Other activities women engage in include beekeeping: oftentimes practiced by women in rural areas, beekeeping is not only an activity that opens up new opportunities. It is also perceived as a sign of emancipation and empowerment.[30]<sup>30</sup>

### **Access and Control Profile**

---

Again, the country's Constitution guarantees gender equality and provides women with the same rights as men to hold public and political offices, including legislature, executive and judiciary. Nevertheless, women's *de facto* participation in political decision-making processes continues to be limited.[31]<sup>31</sup> This is particularly the case at the national level: the Comoros has up to this date not achieved the so-called 'critical mass' of one third female representation, as latest statistics on the proportion of seats held by women in national parliaments show; based on 2019 statistics, women held only 6% of the seats in the Comoros.[32]<sup>32</sup> The situation is significantly better at the local level, where women make up about 30% of the political representatives.[33]<sup>33</sup> However, when community projects are established and funded through Government resources, women are oftentimes still not sufficiently consulted.[34]<sup>34</sup> Generally, male notables at the village square or in mosques take decisions related to community life.[35]<sup>35</sup> Additional information on the Comoros indicates that indeed, women face significant barriers in accessing political life, with their underrepresentation being largely due to stereotypical roles and responsibilities assigned to women and men, and the belief that motherhood and pregnancy represent a constraint for women to attain decision-making positions. It has even been reported that women face the risk of becoming victims of violence from their husband or in-laws, if they engage in a political career without their consent.[36]<sup>36</sup>

Specific information on women's representation and decision-making power in biodiversity and related sectors is scarce. This is not surprising given that no specific national laws, policies, frameworks, strategies or other guiding materials on gender and biodiversity exist, which would usually include such reflections. Generally, and given that women's participation in decision-making at the national level is quite low, it is reasonable to assume that this situation translates to the biodiversity sector.

Inequalities in access also manifest in other sectors, such as education: while literacy of the population has improved over the course of the last decades, the literacy rate remains higher among men than among women, and literacy rates are higher in urban than in rural areas. Further, differences in access to formal education continue to persist with slightly more boys than girls being enrolled in primary education, and more women than men being left without any formal education. Explanatory factors for this situation are manifold but again go mainly back to women and men's different roles and responsibilities in families and communities, and the expectation of young girls to support their mothers with household chores.[37]<sup>37</sup>

The traditional division of roles and responsibilities also manifests at the level of higher education: a large share of students enrolled in programs related to health and education are female (56.6% and 48.5%). However, women are also represented in the fields of technology (49.1%) and law and economics (45.9%). This trend suggests that in the future there will be an increase in women in these branches, which is a desirable development given that women are currently vastly underrepresented in these fields of work. However, with regard to technical and vocational education, three quarters of those receiving training are boys/men. This confirms that overall, the gender stereotype according to which technical courses are made for boys/men, not for girls/women, continues to persist and determines the choice of young people's professional career. Given this, it is not surprising that women are also disadvantaged regarding access to information and communication technologies, which are powerful tools for development. This, again, is particularly the case in rural areas.[38]<sup>38</sup>

---

In the Comoros, and regarding land, property and other non-land assets, married women are theoretically provided with the same rights as married men to own, use, and make decisions. However, land rights in the Comoros result from a combination of customary law, Islamic law and formal law (inherited from the French legal system), and it is unclear how land rights are managed and which legal system takes precedence over the other. Some research suggests that while favorable laws grant access to land, inheritance is a difficult matter in practice because of Islamic law, which grants up to two thirds of the inheritance to boys/men. In addition, poor land registration and a matrilineal system, which affirms the indivisibility and inalienability of the land, fuel women's level of dependence.<sup>[39]</sup> Generally, however, nothing prevents women from accessing the land they own, and use land as collateral to open and access bank accounts and take out loans. Moreover, women may receive some gold as part of the traditional 'grand marriage', which can be sold or used as collateral to access loans. Related to this, another important aspect to look at in the context of GEWE is traditional bank credits, which are increasingly accessible to women in the Comoros. Further, microfinance institutions (MFIs) in the country offer specific financial products for women and adopt more flexible measures in the granting of loans. As a result, more than 50% of the clients of these MFIs are now women.

### Conclusion

The key findings from this gender analysis are as follows:

First, while the legal background for GEWE is in place, women in the Comoros continue to face discrimination, specifically with regards to their participation in the political, social and economic spheres. Thus, more work in these areas is needed, and mainstreaming gender into project activities will support this effort. In doing so, it must be considered that women are not a homogenous group; within this segment of society there are differences too, and these must be accounted for throughout the implementation of the project.

Second, due to the cultural values and traditional roles and responsibilities of women and men that are deeply enshrined in Comorian society, it is of great importance to ensure working with men throughout the project cycle in order to avoid backlash and resistance to GEWE and respective project activities - changing power relations within households and communities comes also always with the risk of backfire.

Third, data on gender in general, and gender and biodiversity in particular, are extremely scarce for the Comoros. Not least due to this situation there is a strong need for continuous and more detailed small-scale gender assessments to be undertaken on site: paying attention to gender relations will generate further data and valuable insights that will help inform project implementation as well as the design and adjustment of tailored, gender-responsive activities and indicators.

### GENDER ACTION PLAN

Gender-related activity	Indicator	Target	Baseline	Timeline	Responsibility
<b>COMPONENT 1. INSTITUTIONS AND GOVERNANCE SYSTEMS</b>					
<b>Output 1.1. Capacity of the new PA agency (Comoros National Parks), DGEF, Park Co-management Committees and village co-management committees to implement and enforce laws, regulations and management systems relating to the PAN is strengthened.</b>					
Ensuring women and PWD are adequately targeted through activities to develop stakeholders' awareness on the new	% of women and disabled people made aware of the PA law and the PA management agency	30 % W 5 % PWD	0	Year 1	-DGEF -Comoros Parks - Gender and PWD Officer

national parks, the law on PAs and the PA management agency and their implications in terms of land and resource use, and contributing to workshops to clarify stakeholders role - including women and PWDs- related to PA management (1.1.2)	% of women and PWD participating in the workshops to clarify stakeholders? roles in PA management	20% W 5% PWD	0	Year 1	
Contribute to the development of documents and diagrams documenting the various services provided by the main ecosystems of PAs by (1.1.3)	Planning and management of PA land use and resources take into account the specific needs of women and PWD	Yes	No	Year 3	-DGEF -Comoros Park -Gender and PWD Officer
Ensuring women and PWD are adequately consulted for the recognition of local communities? rights and benefits related to PAs and that they are integrated in the exchange process between village co-managers of the same park leading to the development of village charters in support of the park (1.1.4)	% of Women and PWD in the village co-management committees	40% W 5% PWD	0	Year 1	-DGEF - Comoros Park - Gender and PWD Officer
<b>Output 1.2. Master plans for terrestrial and marine areas within PAs harmonize of relevant sectoral plans and strategies (fisheries, agriculture, forestry, tourism) with conservation priorities for biodiversity and ecosystem services and reduce inter-community conflicts.</b>					
Contribution to participatory land-use planning workshops to ensure women? and PWD?s interests are adequately addressed (1.2.3)	- PA planning and management meet the interests of women and people with disabilities - Representation (%) of women and	Yes	No	Year 3	-DGEF - Comoros Park - Gender and PWD Office



Ensuring women's and PWD's interests are integrated into the development of resource co-management agreements within PAs, especially the agreements related to the natural resources supporting value chains (1.2.4)	PWD in land-use workshops				
<b>Output 1.3. An Investment Framework and Financing Strategy are developed and implemented to support long-term management of the PA system</b>					
Document gender and PWD issues as part of the social feasibility assessment with PA local communities in order to harmonize PA fees across the network (1.3.2).	- Gender and PWD social inclusion issues are included in the social feasibility assessment process	yes	no		Gender and PWD Officer
Ensure that the FEC's communication strategy specifically targets women and PWDs for any information that concerns them (1.3.5).	Highlight ecological and socio-economic impacts of PAs for women and PWDs in the communication strategy	Yes	No	Year 1	-Gender and PWD Officer -FEC -Communication officer
<b>COMPONENT 2. CAPACITIES FOR CO-MANAGEMENT OF THE NATIONAL PAS NETWORK AT SITE LEVEL</b>					
<b>Output 2.1. Protocols for biodiversity monitoring and data collection are developed and applied including the operationalization of a national database on biodiversity.</b>					
Ensure that all stakeholder information in PA databases are disaggregated by gender and PWDs (2.1.1)	Stakeholder-related information in the PA database is disaggregated by gender and PWD	Yes	No	Year 1	Gender and PWD Officer
<b>Output 2.2. Management tools (including management plans for key terrestrial and marine species used) are drafted, approved, and implemented in PAs. (An appropriately scoped ESIA will be conducted for each management or restoration plan in the PAs to assess all potential social and environmental risks related to their implementation.)</b>					

Assess impacts specifically affecting women and PWDs as part of environmental and social impact studies for all value chains based on plant and wildlife species and on the ecotourism in PAs as part of support to IGAs (2.2.2).	Environmental and social impact studies for the value chains supported by the project include assessments of impacts that specifically affect women and PWDs and measures to avoid or mitigate them are identified and applied	Yes	No	Years 1 to 5	-Gender and PWD Officer -Monitoring-Evaluation-Safeguarding Officer
Ensure that awareness-raising tools, as well as information and awareness-raising campaigns, are relevant and sensitive to the issues faced by women involved in beach sand collection, especially when messages are delivered to village communities (2.2.5)	Number of women involved in the removal of beach sand aware of the environmental impacts of this activity and informed on the alternative IGA options supported by the project		0	Years 1 to 5	-Gender and PWD Officer -Communication officer
Training for community mobilizers, conservationists and ecoguards to ensure that they are adequately informed and aware of gender and PWDs issues and able to adopt gender-sensitive approaches where appropriate (2.2.5)	% of community mobilizers, conservationists and ecoguards trained on gender - sensitive approaches	80%	0	Years 1 to 5	-Gender and PWD Officer - Commissioner for Gender Equality and Promotion
<b>Output 2.3. Effective community co-management models and partnerships are identified, documented, assessed, adapted and applied at specific sites within the PAN</b>					
Ensure that the cost benefit analysis of each community management approach documents these aspects separately by gender (2.3.1)	Analysis of benefits and costs of community management approaches documented for men and women	Yes	No	Year 3	-Gender and PWD Officer -Comoros park -DGEF

Contribution to the evaluation of community management models from the perspective of women's and PWD's participation and of their share of the benefits (2.3.2).	% of women's and PWD's participation in the evaluation of the various community management approaches	50%	0	Year 3	Gender and PWD Officer
Ensure that training prepared and provided by community mobilizers specifically targets women's needs and priorities and that women benefit equitably from the training (2.3.3)	- % of women among beneficiaries of trainings - Gender sensitive training materials are elaborated	50% Yes	0 No	Years 3 to 5	Gender and PWD Officer
<b>Component 3: COMMUNITY LIVELIHOODS WITHIN THE NATIONAL PROTECTED AREA NETWORK</b>					
<b>Output 3.1. Nature-based value chains with real potential for consolidation or sustainable expansion based on a partnership between the private sector and local communities, responding to a strong local market demand, are assessed and selected to provide increased incomes for local community members and contribute directly to the protection of biodiversity</b>					
Contribution to the scoped ESIA studies on the 6 value chains options through the documentation of Gender- and PWD-related issues (3.1.1).	ESIA studies are gender and PWD sensitive and systematically address potential impacts on women and PWDs	Yes	No	year 2	-Gender and PWD Officer -Comoros park
Ensure proportional participation of women in workshops presenting conclusions of impact and feasibility studies and ensure their full understanding of the information shared (3.1.2)	% of women among participants to training workshops - % of women among workshops participants	50%	0	Year 2	- DGEF -Comoros park
<b>Output 3.2. Strengthened capacities of local community members to provide goods and services that meet the needs and standards required for integration into sustainable PA-related value chains</b>					

Establishment or consolidation of community cooperatives and capacity building for local community members including training and local support for cooperative members in microfinance, savings-credit and investment, risk management and micro-entrepreneurship (3.2.1)	- Number of women's cooperatives trained and supported - Number of cooperatives that include PWD members who are trained and supported	10 3	0 0	Years 2 to 5	-Women's Entrepreneurship Department -EFOICOM -Gender and PWD Officer
<b>Output 3.3. Mutually beneficial partnerships between local producers / gatherers / fishermen cooperatives (men and women) and private sector actors are developed with the support of the Mayors and the PA Agency to support the growth of the selected value chains and develop equitable agreements (on the basis of feasibility studies carried out) contributing directly to the reduction of threats to ecosystems within the selected PAs</b>					
Contribute to the identification of the necessary processes that ensure tangible and optimized benefits for women and PWDs in the communities associated with the value chain (3.3.2).	% of agreements signed with value chain actors that benefit women and PWDs	50%	0	Year 2	-Women's Entrepreneurship Department -Comoros Park
<b>Output 3.4. Strengthened business capacities of private enterprises whose operations are linked to PAs, to ensure sustainable expansion of value chains that have a high potential to provide increased incomes for local community members and contribute directly to biodiversity protection</b>					
Support enterprises for the design of their economic model and the development of their business plan (3.4.1)	% of business plans developed that specifically benefit women	50%	0	Years 2 to 5	-UCCIA -EFOICOM -Gender and PWD Officer
<b>Output 3.5. Development of a marketing strategy for all products developed in relation to PAs focused on biodiversity protection, fair trade, and a branding in relation to PAs</b>					
Ensure that women and PWD are adequately targeted by AMIE's support to strengthen their participation in value chains is (3.5.1)	% of women and PWD supported in the developed of the various value chains	50%	0	Years 2 to 5	-UCCIA -EFOICOM -Gender and PWD Officer
Enhance the participation of women and PWD in value chains (3.5.2)					
<b>Output 3.6. Support for IGA start-up</b>					

Contribution to the project interventions for the expansion of value chains to create IGAs for local communities through ensuring that the specific financing and equipment needs of women and PWDs are adequately addressed. (3.6.1)	-Nb of IGAs developed and implemented by women - Number of IGAs whose development and implementation were supported by PWDs - Number of IGAs whose development and implementation were supported by youth	54	0	Years 2 to 5	-Gender and PWD Officer -UCCIA -EFOICOM -Comoros park
Contribution to the support provided to new businesses and community partners to ensure that the needs of women and PWDs are adequately addressed. (3.6.2)		2	0		
		12	0		
<b>Component 4: KNOWLEDGE MANAGEMENT, M&amp;E, AND GENDER AND PEOPLE WITH DISABILITIES (PWD) EQUITY</b>					
<b>Output 4.1 Gender and PWD action plans are implemented, monitored and evaluated</b>					
Integrate women's experiences into knowledge products that incorporate capacity building and capacity development initiatives for the continuity of institutional implementation and learning and activities (4.1.1).	Knowledge products reflecting women's portrayal and lessons learnt featuring women's experiences	Yes	No	years 1 to 5	- Gender and PWD Officer -Comoros Park -DGEF
Annual evaluation of the effects of the implementation of the Gender and PWD action plans and their adaptation (4.1.2)	Proportion (%) of women among participants in the monitoring and evaluation of the results of the Gender and PWD action plans	30%	0	Year 1 to 5	-Gender and PWD Officer -Independent Evaluators
<b>Output 4.2 Technical knowledge and lessons learned from project experiences are compiled and evaluated to increase the effectiveness of project implementation and translated into knowledge products and disseminated within project sites, across Comoros, and among regional SIDS to strengthen the capacities of all biodiversity conservation stakeholders.</b>					
Ensure that the materials produced encourage the use of inclusive gender-neutral language and that women are depicted (4.2.1)	% of materials produced with a gender-sensitive Inclusion perspective	100%	Media products not produced	Years 1 to 5	-Communication and Knowledge Expert -Gender and PWD expert

Monitor indicators in the project results framework, including gender related indicators data disaggregated for men, women and PWDs (output 4.2.2)	Indicators are disaggregated by gender and PWD	Yes	No	Year 1 to 5	-Gender and PWD expert -Comoros park
Support experience-sharing among the staff of the National Agency for Protected Areas and within the Village Co-management Committees for PAs (4.2.3)	Proportion (%) of women among participants in the experience-sharing meetings	40%	-	years 1 to 5	-Gender and PWD expert -Comoros park
<b>Output 4.3 National ownership and pride in Comoros PAs through increased public perception of the richness and uniqueness of the biodiversity and landscapes and the value of the ecosystem services they provide.</b>					
Contribution to the communication plan for the project to ensure that it adequately targets women and PWDs and identifies the appropriate means to convey to them any message likely to be of interest to them (4.3.1).	Percentage of material developed using inclusive language including representations of women and PWDs	100%	Media products not produced	Years 1 to 5.	-Gender and PWD expert -Communication expert
Ensure that all the awareness campaigns, carried out during the project, including the messages and the means of communicating them, are planned according to a gender and PWD sensitive approach (4.3.2).					
<b>Total budget allocation: Integrated in all project activities.</b>					

[1] World Bank data on the Comoros, accessible through <https://data.worldbank.org/country/comoros>

[2] AfDB (2009), Gender Profile of the Union of Comoros.

[3] Union des Comores and UNFPA (2017), Politique Nationale D'egalite Et D'equite Du Genre Actualisee.

[4] World Bank data on literacy rate adult men and women in the Comoros.

- [5] ?Women Count? data from UN Women on the Comoros, accessible through <https://data.unwomen.org/country/comoros>.
- [6] World Bank data on the Women, Business and Law Index on the Comoros. Overall scores are calculated by taking the average score of each of the eight areas (Going Places, Starting a Job, Getting Paid, Getting Married, Having Children, Running a Business, Managing Assets and Getting a Pension), with 100 representing the highest possible score.
- [7] UNDP, Human Development Data (1990-2018)
- [8] UNDP, Gender Development Index
- [9] AfDB, Country Strategy Paper 2016-2020 for Union of Comoros
- [10] Ibrahim Index of African Governance, accessible through <http://iiag.online/>.
- [11] UN Treaty Collection, CEDAW, Status: 29/03/2020.
- [12] Protocol to the African Charter on Human and People?s Rights on the Rights of Women in Africa (2003)
- [13] Union des Comores and UNFPA (2017), Politique nationale d?egalite et d?equite du genre actualisee, Document provisoire.
- [14] CEDAW, Concluding observations on the initial to fourth periodic reports of Comoros (2012)
- [15] This plan is mentioned in the AfDB Country Strategy Paper 2016-2020
- [16] IDA (2019), Comoros ? Integrated Development and Competitiveness Project. Project Appraisal Form.
- [17] UNFP (2018), From midwife to MP - Advancing the rights of women in the Comoros
- [18] UN Women (2016), Remarks by UN Women Deputy Executive Director Lakshmi Puri at the CSW60
- [19] Blanchy, S. (2019) A matrilineal and matrilocal Muslim society in flux: negotiating gender and family relations in the Comoros. *Africa* 89 (1): 21?39.
- [20] GCF Documentation: Gender Assessment for the project ?Ensuring climate resilient water supplies in the Comoros Islands?
- [21] Internal project-related document shared by UNDP.
- [22] Union des Comores and UNFPA (2017), Politique nationale d??galit? et d??quit? du genre actualis?e, Document provisoire.
- [23] World Bank data on female labor force participation in the Comoros
- [24] OECD (2019), Social Institutions & Gender Index, Comoros
- [25] US Department of State (2019), 2019 Country Reports on Human Rights Practices: Comoros
- [26] AfDB, Country Strategy Paper 2016-2020 for Union of Comoros; GCF Documentation: Gender Assessment for the project ?Ensuring climate resilient water supplies in the Comoros Islands?
- [27] Union des Comores and UNFPA (2017), Politique nationale d?egalite et d?equite du genre actualisee, Document provisoire.
- [28] The World Bank (2016), Fishing Communities in the Comoros Develop Fishing Management Projects
- [29] Internal project-related document shared by UNDP.
- [30] Internal project-related document shared by UNDP.
- [31] AfDB, Country Strategy Paper 2016-2020 for Union of Comoros

[32] The World Bank, Proportion of seats held by women in national parliaments (%)

[33] Union des Comores and UNFPA (2017), Politique nationale d'egalite et d'equite du genre actualisee, Document provisoire.

[34] GCF Documentation: Gender Assessment for the project 'Ensuring climate resilient water supplies in the Comoros Islands'

[35] AfDB, Country Strategy Paper 2016-2020 for Union of Comoros

[36] OECD (2019), Social Institutions & Gender Index, Comoros,

[37] Union des Comores and UNFPA (2017), Politique nationale d'egalite et d'equite du genre actualisee, Document provisoire.

[38] Union des Comores and UNFPA (2017), Politique nationale d'egalite et d'equite du genre actualisee, Document provisoire.

[39] OECD (2019), Social Institutions & Gender Index, Comoros

**Does the project expect to include any gender-responsive measures to address gender gaps or promote gender equality and women empowerment?**

Yes

**Closing gender gaps in access to and control over natural resources; Yes**

**Improving women's participation and decision making Yes**

**Generating socio-economic benefits or services or women Yes**

**Does the project's results framework or logical framework include gender-sensitive indicators?**

Yes

#### **4. Private sector engagement**

**Elaborate on the private sector's engagement in the project, if any.**

The partnerships essential to the implementation of the project and the achievement of its development results include the private sector (nature-based enterprises, restaurant and hotel owners). Under Output 3.3, the project will support the establishment of mutually beneficial partnerships between local producers/gatherers/fishers cooperatives and private businesses to support the development of nature-based value chains linked to PAs that will contribute to reduce pressures on biodiversity. The project will support the entrepreneurship capacities of these businesses to enable a sustainable expansion of value chains to provide new and increased sources of income for local communities in PAs. Long-term partnerships with the private sector will be developed or strengthened under Output 1.4 to support the national PA system and the implementation of PA development and management plans.

The CO used the UNDP Private Sector Risk Assessment Tool to evaluate whether or not UNDP should pursue a partnership with the following private businesses: EcoMassiwa, Comoros Moringa, Massala D'lices, Maya Beaut' et Cosm'iques. The findings of the assessment indicate that the practices of these companies comply with UNDP environmental, social and governance standards and that a



partnership with these companies under the project does not present significant risks. Should additional private businesses be identified as partners during project implementation, the UNDP Private Sector Risk Assessment Tool will be applied to those entities as well.

**5. Risks to Achieving Project Objectives**

**Elaborate on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved, and, if possible, the proposed measures that address these risks at the time of project implementation.(table format acceptable):**

**Project risks and mitigation measures**

<b>IDENTIFIED RISKS AND CATEGORY</b>	<b>IMPACT</b>	<b>LIKELIHOOD</b>	<b>RISK ASSESSMENT</b>	<b>MITIGATION MEASURES</b>
--------------------------------------	---------------	-------------------	------------------------	----------------------------

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>FINANCIAL</u> The lack of reliable financial flows for the PA system compromises the effectiveness of PA management beyond the duration of the project intervention</p>	High	Likely	High	<p>The financial requirements analysis conducted in the 4950 to cover the recurrent costs of the management and development plans for all 6 protected areas in Comoros estimated the requirements at \$1.5 million. UNDP recognizes that addressing the goal of financial sustainability at the level of the PA system is important, but that it takes time, and that the approach should preferably be systemic in scope.</p> <p>The project will take a concerted approach to mobilizing resources from a variety of sources, including broadening the base of donors and partners supporting the PA system, and involving the private sector. To this end, an investment framework and financing strategy will be developed and implemented to support the management of the national PA system (Output 1.3). The project will put in place an enabling legislative framework for the FEC and resource mobilization (sub-output 1.3.1) and mobilize all necessary internal and external financial resources (sub-output 1.3.3) and carry out the necessary fundraising to establish a trust fund the revenues of which can cover the recurrent costs of the proper functioning of all protected areas in Comoros. The support will also include capacity building for the Board of Directors and the FEC Management</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>SOCIAL and ENVIRONMENTAL</u> Land disputes between individuals in the same village and between contiguous villages within protected areas could be an obstacle to effective management of protected areas and the adoption of new and sustainable resource use practices.</p>	High	Likely	High	<p>Addressing land tenure at the regulatory level may require solutions at the systemic level that go beyond the objectives for which the project is designed. However, Project Sub-output 1.2.1 is designed to document and map the delineation of village lands within protected areas and the demarcation of protected area boundaries with the participation of local communities. The project will contribute to clarifying the land tenure issue, particularly to know the extent of community land ownership, or village lands, within the newly created National Parks (Karthala, Mitsamiouli-Ndrou?, C?lacanthe, Mont Ntringui and Shissiwani). Thus, national park management plans will integrate land issues into the review of park policy and strategy and into the revision of park management plans and all community engagement activities, in order to accurately capture land and community engagement issues in national park management. Any areas of dispute will be documented (nature of the dispute, parties involved) geo-referenced and mapped to serve as a common reference for the parties involved and a mechanism will be proposed to assist communities in resolving the dispute. All appropriate safeguards will be applied to ensure that</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>POLICY</u> To achieve the ambitions of the Emerging Comoros 2030 Plan, government and local authorities prioritize short-term gains over the long-term intangible benefits of conservation when faced with scarce economic opportunities and invest heavily in development and resource exploitation without applying sustainable development requirements and create undue pressure on land, water and remaining natural forest resources.</p>	High	Likely	High	<p>Component 1 of the project includes several interventions highlighting the importance of preserving biodiversity and ecosystem services for the country's development and economy. The interventions planned under Component 4 on communication and knowledge sharing will ensure wide dissemination of this information to raise awareness of these issues among a broad audience.</p> <p>Following the launch of the project, an awareness campaign will be conducted among all stakeholders on the newly established PA system, including the new law on protected areas, the 5 new PAs and the national agency for the management of the protected area system, with the objective of understanding (i) the implications in terms of access to and use of land and resources and (ii) the roles and responsibilities conferred on the various institutions under the regulations governing biodiversity conservation, in order to optimize their complementarities and synergies in the effective management of the PA system (sub-output 1.1.2). The project will support the implementation of a strategic plan for communication and awareness raising on the ecosystem goods and services provided by PAs, the PA Law, the</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>ENVIRONMENTAL</u></p> <p>Climatic risks and natural disasters: Due to its geographical location, fragile soils and volcanic activity (for Ngazidja), Comoros is prone to cyclones, heavy rains, landslides, habitat disturbances and floods.</p>	High	Likely	High	<p>This risk will be mitigated by reducing threats to forest ecosystems and reducing overall pressures in order to reduce the vulnerability of protected areas to climate change and increase resilience to the effects of climate change. Climate change is a slow-acting risk, and is constantly monitored in Comoros, including monitoring the health of coral reefs, seagrass beds, and mangroves; monitoring forest cover; and monitoring emblematic and endemic terrestrial wildlife. The project will put in place management plans based on the monitoring of all the resources valued within the framework of the value chains in order to be able to adjust the levels of use, or even to put an end to it, in order not to increase their vulnerability to climate risks and thus affect the long-term survival of natural populations. In addition, a specific climate risk assessment (Annex 13 of the GEF-UNDP Project Document) was carried out which identifies project interventions that will contribute to reduce risks and vulnerabilities to climate change.</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><b>STRATEGIC</b></p> <p>Potential conflict of interests and related damage to UNDP's reputation due to blood relationship between the Director of the Implementing Partner (DGEF) and the Head of the UNDP Programme Unit.</p>	<p>Medium</p>	<p>Certain</p>	<p>High</p>	<p>To manage this risk, all UNDP-funded projects executed by DGEF will be supervised directly by the UNDP Deputy Resident Representative.</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>OTHER</u> Gas development, including studies involving drilling and gas development, pose varying degrees of threats to cetaceans, sea turtles and fish. Potential oil spills increase pollution risks to the marine environment and coastal habitats</p>	High	Moderately Likely	Medium	<p>The country is developing its gas potential. Seismic studies have been carried out and have identified 40 blocks that could be exploited. The exploitation contracts established with companies include an exploratory drilling phase to determine the existence of hydrocarbons in the Comorian territory. This phase was planned between 2021 and 2023 but has been postponed to between 2023 and 2025 due to the health situation related to COVID.</p> <p>Gas drilling and exploitation operations will result in intense traffic of large vessels and increase the risk of collision with cetaceans. In addition, the risk of oil spills can lead to marine and coastal pollution and threaten all marine and coastal biodiversity.</p> <p>To mitigate this risk, the government has prohibited all drilling below 8,000 square kilometers. In addition, the protected areas agency will advocate to be an integral part of the institutions that will review the environmental impact assessments done on the 40 blocks likely to be drilled. At the same time, the national protected areas agency will develop guidelines for drilling and gas operations to avoid or mitigate their impacts on the environment and biodiversity. These guidelines may include the delineation of navigational corridors</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>ENVIRONMENTAL</u>  Marine and terrestrial ecosystems are not sufficiently resilient and their biological and physical integrity is gradually being compromised by the effects of global and regional climate change.</p>	Medium	Likely	<b>Medium</b>	<p>Management of the national protected area system will seek to control major pressures on biodiversity and harmonize the management of important biodiversity resources within PAs with that of the surrounding ecosystems in order to reduce the negative impacts of activities that take place outside PAs.</p> <p>Improving the health of seagrass beds, coral reefs, mangroves, forests and associated biodiversity by reducing pressures will boost their resilience to climate change-induced stresses such as coral bleaching.</p>



IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>INSTITUTIONAL</u> There is insufficient institutional capacity to co-manage the PA system.</p>	Medium	Moderately likely	Low	<p>The project aims to improve the capacity of stakeholders in the co-management of all protected areas in Comoros, including institutions such as the Agency for the Management of Protected Areas, the General Directorate of Environment and Forests, the co-management committees of each national park and the village co-management committees of national parks.</p> <p>In accordance with Article 53 of Law No. 18-005/AU of December 05, 2018 on the national system of protected areas of the Comoros relating to the management delegation, the agency called 'Comoros National Parks' has as its essential mission: to manage protected areas in accordance with the provisions of the law on protected areas; to ensure regulatory control within protected areas; to develop and implement the development and management plans of protected areas. Furthermore, the national protected area system has established 56 village co-management committees for protected areas and 6 site co-management committees. All of these PA governance bodies constitute a network of actors capable of participating in the PA co-management process promoted in Comoros.</p> <p>The project will develop formal collaboration</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>STRATEGIC</u> The socio-economic context is unstable and does not favor the emergence of environmental awareness among the population, who are not willing to change their behaviors and unsustainable uses of natural resources.</p>	Medium	Moderately likely	Low	<p>The project will continue to raise awareness among local communities on the benefits associated with biodiversity conservation and ecosystem services through environmental education and will provide demonstration and training on new sustainable resource use practices and associated benefits (Sub-outputs 4.3.1 and 4.3.2). It will support the development of a livelihoods program based on the sustainable use of ecosystem services provided by PAs (component 3).</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><u>SOCIAL AND ENVIRONMENTAL</u></p> <p>3<sup>rd</sup> or further waves of COVID-19, especially with the threat of the new delta variant that is already affecting countries in the region. The government could therefore adopt restrictive measures that will affect project implementation</p>	Medium	Moderately likely	Low	<p>The capacity building of communities and the development of partnerships with the private sector (component 3) will generate new sources of income based on the sustainable valuation of ecosystem goods and services within PAs, which will contribute to the economic recovery of communities affected by COVID-19 while strengthening the ecological resilience of the country.</p> <p>In addition, the co-management committees of the national parks with the support of community mobilisers are important actors in the implementation of the risk communication and community engagement plan (CREC) for the COVID-19 response. The ecoguards, particularly those assigned to the coastal villages, will support the efforts of the police to strengthen the control and surveillance system along the coasts to limit the spread of the virus across the islands in the country.</p> <p>Furthermore, a specific COVID risk and opportunity analysis was conducted, and an action plan developed to address COVID-related risks (Annex 7 the GEF-UNDP Project Document).</p>

**6. Institutional Arrangement and Coordination**

**Describe the institutional arrangement for project implementation. Elaborate on the planned coordination with other relevant GEF-financed projects and other initiatives.**

The project is Full CO Support to NIM modality and therefore all grant funds for the four project components (Components 1, 2, 3 and 4) will be managed by UNDP, in accordance with Full CO Support to NIM requirements. The DGEF was HACT micro-assessed in 2020, which resulted in an overall rating of High Risk. In light of this High Risk rating, and in line with UNDP's Policy and Operations Policies and Procedures (POPP) to provide Full Country Office Support to National Implementation Modality (NIM), the Government of the Union of Comoros (through MAFE and DGEF) has requested UNDP to provide execution support for the following services for this project. The arrangement was also approved by GEF Secretariat.

- ? Financial management: payment processing, issuing checks, creating vendor forms and managing vendor profiles;
- ? Staff selection and recruitment and recurring personnel management services;
- ? Recruitment of national and international consultants;
- ? Procurement of goods and services;
- ? Administration and logistics;
- ? Information and technology;
- ? Travel management.

A Letter of Agreement (LOA) has been signed between the Government and UNDP to confirm the above arrangement (Annex 29).

The capacities of DGEF will be HACT micro-assessed in due course during project implementation.

**Section 1. General roles and responsibilities of the project's governance mechanism**

Implementing Partner: The Implementing Partner for this project is the Ministry of Agriculture, Fisheries, Environment, Tourism and Handicraft, which delegates its implementing role for this project to the General Directorate of Environment and Forests. The Implementing Partner is the entity to which the UNDP Administrator has entrusted the implementation of UNDP assistance specified in this signed project document along with the assumption of full responsibility and accountability for the effective use of UNDP resources and the delivery of outputs, as set forth in this document.

MAFETH, as the GEF Executing Agency, will work in close collaboration with UNDP to manage project planning and approval of project budgets, and ensure full Government ownership of project implementation. The Project Management Unit and consultants will be physically located in the offices of MAFETH/DGEF and operate under their supervision. MAFETH, as the Implementing Partner, will hold control over planning and approval of project budgets. They will also be responsible for the quality of results produced by consultants and institutions/vendors implementing project activities.

The Implementing Partner is responsible for executing this project. Specific tasks include:

- ? Project planning, coordination, management, monitoring, evaluation and reporting. This includes providing all required information and data necessary for timely, comprehensive and evidence-based project reporting, including results and financial data, as necessary. The Implementing Partner will strive to ensure project-level M&E is undertaken by national institutes and is aligned with national systems so that the data used and generated by the project supports national systems;
- ? Risk management as outlined in this Project Document;
- ? Providing adequate premises for the Project Coordination Unit within the Government premises;
- ? Financial management, including overseeing financial expenditures against project budgets and approving project budget;
- ? Approving and signing the multiyear workplan;
- ? Approving and signing the combined delivery report at the end of the year; and,
- ? Signing the financial report or the funding authorization and certificate of expenditures.

Responsible Parties:

The following responsible parties and their expected roles have been identified as part of the project preparation activities. It should be noted that the responsible parties will not be part of the project steering committee to avoid a conflict of interest. Potential contractual arrangements will be assessed and prepared in line with UNDP's POPP.

- The University of the Comoros (UdC) through the Comoros Herbarium Department specializes in the assessment and mapping of terrestrial biodiversity. A Service Contract will be signed and implemented with the UdC to (i) carry out baseline inventories and mapping of terrestrial ecosystems and assess their capacity to sequester green carbon; and (ii) develop protocols for the restoration of terrestrial and coastal ecosystems.

- The Association of Intervention for Development and Environment (AIDE) is an NGO established in 1998 and specializes in monitoring of marine biodiversity in the Comoros. It is designated by the country as a national focal point for coral reef monitoring. A Service Contract will be signed and implemented to (i) train Ecoguards in monitoring protocols for coral reefs, seagrass beds and mangroves; and (ii) carry out the inventory and baseline mapping of marine ecosystems and the assessment of their blue carbon sequestration capacity.

- DAHARI is an NGO specializing in monitoring terrestrial biodiversity, agroecology and supporting farmers for the adoption of sustainable practices compatible with biodiversity. A Service Contract will be signed and implemented for (i) training ecoguards in the application of long-term ecological monitoring protocols in primary and secondary forests.

#### Project stakeholders and target groups:

The project stakeholders, their interests and their role in the implementation of the project were identified as part of its preparation, and a plan for their mobilization was developed (Annex 9). Stakeholders include the following groups:

i. The populations of the villages located within the protected areas will be the main beneficiaries of the project on all the components and more particularly for the support for the development of IGAs within value chains in partnership with the private sector. They are the most likely to be directly and indirectly involved in on-site interventions and affected by them in their access to natural resources and for their livelihoods. These vulnerable populations include in particular the users of natural resources within PAs (pastoralists, loggers, charcoal makers, fishers, women and young sand collectors and firewood collectors, women fishing on foot, ylang-ylang distillers, collectors and sellers of marine biodiversity products).

ii. Another beneficiary group of the project is private companies using natural products from protected areas. They will be supported by training and entrepreneurial support for the establishment or expansion of sustainable and profitable value chains in partnership with community cooperatives, or by facilitating their partnership (hoteliers and restaurateurs) with fishers practicing sustainable fishing.

iii. The institutions directly involved in the co-management of protected areas are the Ministry in charge of the Environment, the General and Regional Directorates in charge of the Environment, the National Agency for the Management of National Parks, the National Parks' Co-management Committees and the National Parks' Village Committees are key stakeholders in project implementation and will also benefit from capacity building to improve the effectiveness of co-management processes. The National Parks Agency will play an essential role, both as beneficiary of the capacity building for the management of protected areas and as an actor at site level via the management units of each of the national parks for the implementation of PA management activities and support to local communities. Each individual park management unit includes a *Conservateur*, a Community Mobilizer and a team of ten to twelve Ecoguards.

iv. Other island and local government institutions in connection with PAs, including the Directorates of Agriculture, Fisheries, Tourism, the Land service, the CRDEs concerned, the institutions of Justice, town halls and prefectures, academic and scientific institutions (UdC, CNDRS, INRAPE) and the security forces are a key group whose skills will be sought to support the implementation of interventions in each of the project components. The Finance Department will be closely associated with all activities carried out for the operationalization of the Comoros Environmental Fund and the mobilization of financial resources (Output 1.3).

v. Local associations and NGOs involved in environmental protection represent a group of stakeholders whose support will be requested to provide training to local communities, private partners, and staff of the PNC Agency, and to raise awareness of the country's population with regard to various issues addressed by the project, particularly the importance of protecting biodiversity in a national park system to provide a set of ecosystem services for the benefit of all, and to promote sustainable and equitable products from the National Parks of the Comoros.

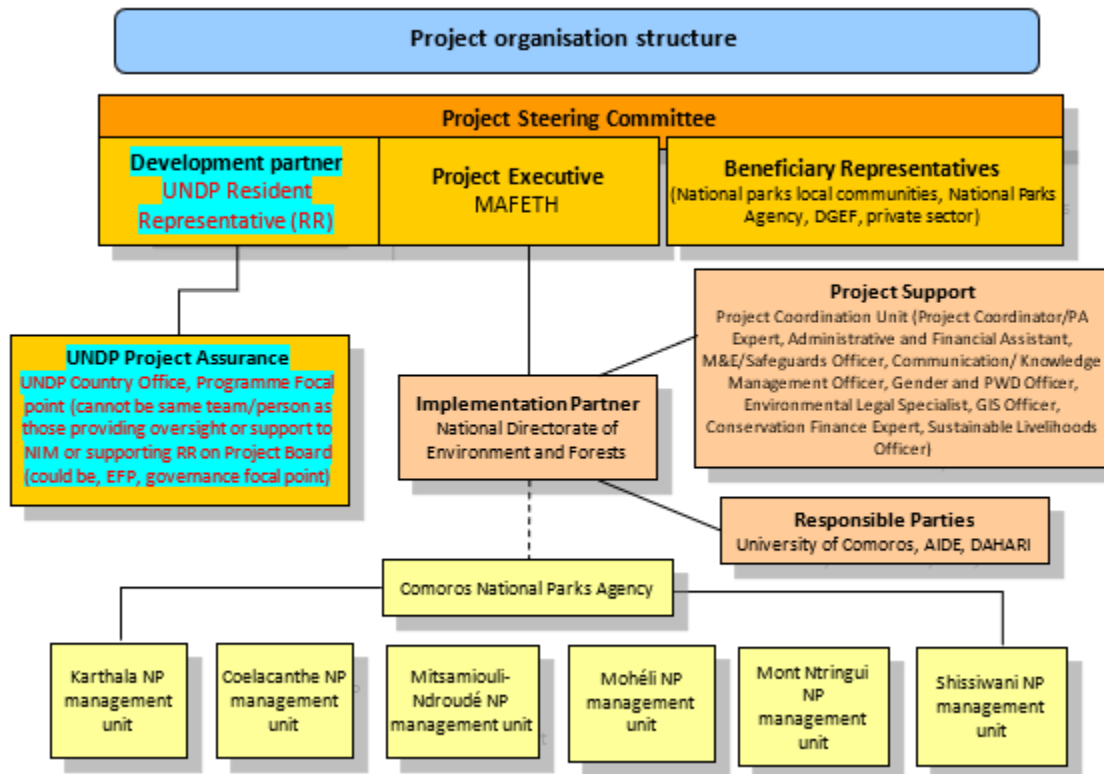
vi. The project will also seek the support of the media, community opinion leaders including village chiefs, notables, religious leaders, and the diaspora to support the implementation of interventions with local communities and the public in general.

The project will ensure a meaningful, effective and informed participation of these stakeholders in the planning and implementation activities of NP management plans, land and coastal area management plans within NPs, and management plans for the natural resources used by local communities for their livelihoods. The effective participation of the various stakeholders will be the responsibility of the Project Coordinator following the guidelines provided in the stakeholder mobilization plan (Annex 9) which identifies the expected participation of stakeholders for all project activities. The Gender and PWD Officer will particularly ensure that relevant information reaches women and PVH and to put in place favorable conditions for their active participation in the various activities that concern them. The project provides for training and support for local communities by PN Agency staff, in particular Community Mobilizers, to promote the effectiveness of participatory processes, particularly through structures such as village committees and parks co-management committees. Participation will also be encouraged by a targeted communication strategy to keep all the actors concerned informed of the planned activities on an ongoing basis under the responsibility of the CKM Officer, supported by the staff of the PN Agency who will see to relay information to local communities and other local partners.

UNDP: UNDP is accountable to the GEF for the implementation of this project. This includes overseeing project execution undertaken by the Implementing Partner to ensure that the project is being carried out in accordance with UNDP and GEF policies and procedures and the standards and provisions outlined in the Delegation of Authority (DOA) letter for this project. The UNDP GEF Executive Coordinator, in consultation with UNDP office and the Implementing Partner, retains the right to revoke the project DOA, suspend or cancel this GEF project. UNDP is responsible for the Project Assurance function in the project governance structure and presents to the Project Board and attends Project Board meetings as a non-voting member.

A strict firewall will be maintained between the delivery of project oversight and quality assurance performed by UNDP and charged to the GEF Fee and any support to project execution performed by UNDP (as requested by and agreed to by both the Implementing Partner and GEF) and may be charged to the GEF project management costs (only if approved by GEF). The segregation of functions and firewall provisions for UNDP in this case is described in the next section.

## Section 2: Project governance structure:



UNDP Resident Representative assumes full responsibility and accountability for oversight and quality assurance of this Project and ensures its timely implementation in compliance with the GEF-specific requirements and UNDP's Programme and Operations Policies and Procedures (POPP), its Financial Regulations and Rules and Internal Control Framework. A representative of the UNDP Country Office will assume the assurance role and will present assurance findings to the Project Board, and therefore attend Project Board meetings as a non-voting member.

**UNDP project support:** The Implementing Partner and GEF OFP have requested UNDP to provide support services in the amount of **USDS 232,587** for the full duration of the project, and for the cost of these services to be charged to the project budget. The execution support services have been set out in detail and agreed between UNDP Country Office and the Implementing Partner in a Letter of Agreement (LOA). This LOA is attached to this Project Document. The capacities of DGEF will be HACT micro-assessed in due course during project implementation.

To ensure the strict independence required by the GEF and in accordance with the UNDP Internal Control Framework, these execution services will be delivered independent from the GEF-specific oversight and quality assurance services.

## Section 3: Segregation of duties and firewalls vis-?-vis UNDP representation on the project board:

As noted in the [Minimum Fiduciary Standards for GEF Partner Agencies](#), in cases where a GEF Partner Agency (i.e. UNDP) carries out both implementation oversight and execution of a project, the GEF Partner Agency (i.e. UNDP) must separate its project implementation oversight and execution duties, and describe in the relevant project document a: 1) Satisfactory institutional arrangement for the separation of implementation oversight and executing functions in different departments of the GEF Partner Agency; and 2) Clear lines of responsibility, reporting and accountability within the GEF Partner Agency between the project implementation oversight and execution functions.

In this case, UNDP's implementation oversight role in the project ? as represented in the project board and via the project assurance function ? is performed by identified staff in UNDP Comoros? Sustainable

Development Unit, specifically: Programme Analyst in charge of Environment/ Disaster Risk Reduction, the Programme Management Support, the M&E Specialist, and the Gender Expert. The Programme Management Support Unit is specifically responsible for quality assurance of the implementation of project activities in line with UNDP rule and regulations and GEF policies.

UNDP's execution role in the project (as requested by the implementing partner and approved by the GEF) is performed by Humans Resources, Procurement, and Finance staff in the Operations Unit.

#### **Section 4: Roles and Responsibilities of the Project Organization Structure:**

a) **Project Board:** All UNDP projects must be governed by a multi-stakeholder board or committee established to review performance based on monitoring and evaluation, and implementation issues to ensure quality delivery of results. The Project Board (also called the Project Steering Committee) is the most senior, dedicated oversight body for a project.

The two main (mandatory) roles of the project board are as follows:

1) **High-level oversight of the execution of the project by the Implementing Partner** (as explained in the [?Provide Oversight?](#) section of the POPP). This is the primary function of the project board and includes annual (and as-needed) assessments of any major risks to the project, and decisions/agreements on any management actions or remedial measures to address them effectively. The Project Board reviews evidence of project performance based on monitoring, evaluation and reporting, including progress reports, evaluations, risk logs and the combined delivery report. The Project Board is responsible for taking corrective action as needed to ensure the project achieves the desired results.

2) **Approval of strategic project execution decisions of the Implementing Partner** with a view to assess and manage risks, monitor and ensure the overall achievement of projected results and impacts and ensure long term sustainability of project execution decisions of the Implementing Partner (as explained in the [?Manage Change?](#) section of the POPP).

#### **Requirements to serve on the Project Board:**

- Agree to the Terms of Reference of the Board and the rules on protocols, quorum and minuting.
- Meet annually; at least once.
- Disclose any conflict of interest in performing the functions of a Project Board member and take all measures to avoid any real or perceived conflicts of interest. This disclosure must be documented and kept on record by UNDP.
- Discharge the functions of the Project Board in accordance with UNDP policies and procedures.
- Ensure highest levels of transparency and ensure Project Board meeting minutes are recorded and shared with project stakeholders.

#### **Responsibilities of the Project Board:**

- Consensus decision making:
  - The project board provides overall guidance and direction to the project, ensuring it remains within any specified constraints, and providing overall oversight of the project implementation.
  - Review project performance based on monitoring, evaluation, and reporting, including progress reports, risk logs and the combined delivery report;
  - The project board is responsible for making management decisions by consensus.
  - In order to ensure UNDP's ultimate accountability, Project Board decisions should be made in accordance with standards that shall ensure management for development results, best value money, fairness, integrity, transparency and effective international competition.
  - In case consensus cannot be reached within the Board, the UNDP representative on the board will mediate to find consensus and, if this cannot be found, will take the final decision to ensure project implementation is not unduly delayed.
- Oversee project execution:
  - Agree on project manager's tolerances as required, within the parameters outlined in the project document, and provide direction and advice for exceptional situations when the project manager's tolerances are exceeded.
  - Appraise annual work plans prepared by the Implementing Partner for the Project; review combined delivery reports prior to certification by the implementing partner.



- Address any high-level project issues as raised by the project manager and project assurance;
- Advise on major and minor amendments to the project within the parameters set by UNDP and the donor and refer such proposed major and minor amendments to the UNDP BPPS Nature, Climate and Energy Executive Coordinator (and the GEF, as required by GEF policies);
- Provide high-level direction and recommendations to the project management unit to ensure that the agreed deliverables are produced satisfactorily and according to plans.
- Track and monitor co-financed activities and realisation of co-financing amounts of this project.
- Approve the Inception Report, GEF annual project implementation reports, mid-term review and terminal evaluation reports.
- Ensure commitment of human resources to support project implementation, arbitrating any issues within the project.

•**Risk Management:**

- Provide guidance on evolving or materialized project risks and agree on possible mitigation and management actions to address specific risks.
- Review and update the project risk register and associated management plans based on the information prepared by the Implementing Partner. This includes risks related that can be directly managed by this project, as well as contextual risks that may affect project delivery or continued UNDP compliance and reputation but are outside of the control of the project. For example, social and environmental risks associated with co-financed activities or activities taking place in the project's area of influence that have implications for the project.
- Address project-level grievances.

•**Coordination:**

- Ensure coordination between various donor and government-funded projects and programmes.
- Ensure coordination with various government agencies and their participation in project activities.

**Composition of the Project Board:** The composition of the Project Board must include individuals assigned to the following three roles:

**1. Project Executive:** This is an individual who represents ownership of the project and chairs (or co-chairs) the Project Board. The Executive usually is the senior national counterpart for nationally implemented projects (typically from the same entity as the Implementing Partner). In exceptional cases, two individuals from different entities can co-share this role and/or co-chair the Project Board. If the project executive co-chairs the project board with representatives of another category, it typically does so with a development partner representative. The Project Executive is: the Permanent Secretary of the Ministry of Agriculture, Fisheries, Environment, Tourism, and Handicraft.

**2. Beneficiary Representative(s):** Individuals or groups representing the interests of those groups of stakeholders who will ultimately benefit from the project. Their primary function within the board is to ensure the realization of project results from the perspective of project beneficiaries. Often representatives from civil society, industry associations, or other government entities benefiting from the project can fulfil this role. There can be multiple beneficiary representatives in a Project Board. The Beneficiary representatives are:

- 6 representatives (one per national park) of village NP co-management committees as representatives of local communities

- 1 representative of the fishers' union, 1 representative of users of aromatic and medicinal plants, 1 representative involved in ecotourism, 3 representatives of environmental NGOs (one per island), as representatives of users of natural resources in parks,

- The director of the National Parks Agency,

- National Directors in Environment, Tourism, Fisheries, Agriculture, Finance, and Land use Planning and Regional Directors in Environment,

- The Secretary General of the Union of Chambers of Commerce, Industry and Agriculture to represent private entrepreneurs involved in value chains based on resources from protected areas

**3. Development Partner(s):** Individuals or groups representing the interests of the parties concerned that provide funding, strategic guidance and/or technical expertise to the project. The Development Partners are:

- UNDP Resident Representative in the Union of the Comoros.
- Director of the French Development Agency in the Union of the Comoros
- National CBD Focal Point and National GEF Focal Point

b) **Project Assurance:** Project assurance is the responsibility of each project board member; however, UNDP has a distinct assurance role for all UNDP projects in carrying out objective and independent project oversight and monitoring functions. UNDP performs quality assurance and supports the Project Board (and Project Management Unit) by carrying out objective and independent project oversight and monitoring functions, including compliance with the risk management and social and environmental standards of UNDP. The Project Board cannot delegate any of its quality assurance responsibilities to the Project Manager. Project assurance is totally independent of project execution.

A designated representative of UNDP playing the project assurance role is expected to attend all board meetings and support board processes as a non-voting representative. It should be noted that while in certain cases UNDP's project assurance role across the project may encompass activities happening at several levels (e.g., global, regional), at least one UNDP representative playing that function must, as part of their duties, specifically attend board meeting and provide board members with the required documentation required to perform their duties. The UNDP representative playing the main project assurance function in the project management support unit (PMSU) is Ms. Anliyat Mze Ahmed, Programme Analyst in charge of Environment/ Disaster Risk Reduction in the Sustainable Development Unit. She is responsible for quality assurance over the implementation of project activities in line with UNDP rules and regulations and GEF policies. She is also responsible for ensuring the sound financial management of the project.

c) **Project Management ? Execution of the Project:** The Project Manager (PM) (called Project Coordinator in this project) is the senior most representative of the Project Management Unit (PMU) and is responsible for the overall day-to-day management of the project on behalf of the Implementing Partner, including the mobilization of all project inputs, supervision over project staff, responsible parties, consultants and sub-contractors. The project manager typically presents key deliverables and documents to the board for their review and approval, including progress reports, annual work plans, adjustments to tolerance levels and risk registers.

A designated representative of the PMU is expected to attend all board meetings and support board processes as a non-voting representative.

The primary PMU representative attending board meetings is the Project Manager/National Coordinator who will be recruited from the start of the project.

#### **Composition of the Project Coordination Unit (PCU)**

The Project Coordination Unit includes the following roles: Project Coordinator/PA Expert, Administrative and Financial Assistant, Monitoring & Evaluation and Safeguards Officer, Communication/Knowledge Management Officer, Gender and PWD Officer, part-time (50%) Environmental Legal Specialist, part-time (50%) GIS Officer, Conservation Finance Expert, and Sustainable Livelihoods Officer. Detailed staff and consultant TORs are provided in Annex 8.

The role and responsibilities of the PCU as a team will include participatory preparation of project work plans in line with the Project Document, managing and implementing day-to-day project operations in each area of intervention while ensuring adherence to the project's work plans, making sure all stakeholders are aware of activities, tasks and deadlines that they are responsible for or in which they are involved,

maintaining close communications with partners to foster synergies among interventions in PAs, and monitoring and assessing results to ensure that overall interventions effectively enable progress towards project's intended results.

In addition to coordination/management functions, the Project Coordinator will assume technical functions as a PA Expert in all components. The Project Coordinator/PA Expert will work closely with an experienced Administrative and Financial Assistant with solid capacities to support overall management. The Environmental Legal Specialist (part-time) will be responsible for developing implementing texts and providing legal advice as part of various outputs mostly under the first component. The Gender & PWD Officer will be responsible for overseeing gender and PWD integration in all project components and monitoring the implementation of the action plans related to gender and to PWD. The Communication and Knowledge Management Officer will be responsible for the development and implementation of the project communication strategy in support of all components and in the coordination of the development and dissemination of knowledge products from the project experience. The Conservation Finance Officer will have the overall responsibility for setting up and operationalizing the FEC and mobilizing financial resources at national and international levels in close collaboration with the FEC Board and relevant actors in the Government, in line with the outline provided under Output 1.3. The GIS Officer will have the overall responsibility for setting up a database connecting all PAs with the support of a database expert and for training PA management units, for coordinating activities related to delineation (of PAs and various zones within), for producing georeferenced maps needed for various decision-making and management purposes with PA stakeholders including local communities, for technical supervision of the updating, dissemination and sharing of data on PAs and biodiversity in the Comoros. The M&E/Safeguards Officer will have the overall responsibility for implementation of the Project M&E Plan, including documenting PRF indicators in collaboration with other project staff, overseeing the development of the project ESMP in the 1<sup>st</sup> year of the project and supervising its implementation, including EIA and SESA, continuous monitoring of environmental and social risks, and reporting as part of the annual review processes. The Sustainable Livelihoods Officer will have the overall responsibility of coordinating interventions to support the development of sustainable livelihoods for local communities through nature-based enterprises and fair partnerships with the emerging private sector, including technical feasibility studies for the development of value chains, establishment of community cooperatives and strengthening of their capacities, and development of a marketing strategy including a national certification system.

At site level, the PCU will be supported by the national parks management units. The management units of the new NPs each include a *Conservateur*, a Community Mobilizer and ten (10) ecoguards. The Mohéli National Park Management Unit (supported by the French Development Agency) includes a director, an administrative and financial manager, a management assistant, seven officers, five rangers, and 14 ecoguards. The *Conservateurs* in the Coelacanth, Karthala, Mitsamiouli-Ndrou?, Ntringui, and Shissiwani NPs, and the Director of the Mohéli NP (the latter under French Development Agency co-financing) will be responsible for coordinating, supervising, and providing technical inputs under various outputs under each component, in accordance with their coordination role for the implementation of the PA management plan. The Community mobilizers in the Coelacanth, Karthala, Mitsamiouli-Ndrou?, Ntringui and Shissiwani National Parks will be responsible for supervising and supporting the communication and consultation with local communities, will help educate, inform and support them, especially for their consultation on the recognition of their rights and benefits related to PAs, will support and encourage the involvement of local communities in the implementation of annual monitoring and surveillance activities as part of each park management plan, and will provide continued local support to members of local communities benefiting from IGAs (component 3). Under the direct authority of each PA *Conservateur*, Ecoguards are responsible for informing and raising awareness of local communities and visitors on the PA regulations, the importance of biodiversity and the impacts of harmful activities, and for supporting them in their co-management role; they are responsible for ecological monitoring on the basis of established protocols and the recording of data, and monitoring, including the communication of any incident likely to affect the PA and its resources and to verbalize offenders for any infringement committed in the PA and the preparation of reports.

**Project extensions:** The UNDP Resident Representative and the UNDP-GEF Executive Coordinator must approve all project extension requests. Note that all extensions incur costs and the GEF project budget cannot be increased. A single extension may be granted on an exceptional basis and only if the following

conditions are met: one extension only for a project for a maximum of six months; the project management costs during the extension period must remain within the originally approved amount, and any increase in PMC costs will be covered by non-GEF resources; the UNDP Country Office oversight costs in excess of the CO's Agency fee specified in the DOA during the extension period must be covered by non-GEF resources.

The contributions from other relevant initiatives as provided in Table 3 under Section IV. Results and Partnerships of the GEF-UNDP Project Document are presented in the following table.

Contributions from other projects and interventions to the achievement of project results

<b>Project / Objective</b>	<b>Donor / Implementation Partner</b>	<b>Period and site of intervention related to the project</b>	<b>Complementarities</b>
<b>DIDEM</b> / Develop capacities for decision-making and policy development for the sustainable management of coastal and marine environments based on scientific knowledge	FFEM, IRD, UNEP, CRDI	2021-2023 Shissiwani and Moh?li National Parks	Support for science-decision making dialogue (sub-output 1.1.3) Integration of scientific knowledge into marine area management decision-making (sub-outputs 1.2.3, 2.1.2, 2.2.1, 2.2.2) Dissemination of scientific knowledge (components 2 and 4)
<b>SWIOFISH 2</b> / Improving the management of priority fisheries at regional, national and community levels	World Bank - IOC / DGRH (MAFETH)	2018-2023 Mitsamiouli-Ndroud? National Park	Sharing of experiences, information exchange system for deterring and preventing illegal fishing (Outputs 2.1, 4.1) fisheries monitoring missions (Output 2.1), blue economy in the context of climate change (Output 2.4)

Project / Objective	Donor / Implementation Partner	Period and site of intervention related to the project	Complementarities
Protecting biodiversity and building resilience through effective management of the marine protected areas of the Comoros / Support and improve the effective implementation of three coastal MPAs and improve the management of the Mohéli MPA	Ocean?5 / WILDOCEAN / NP Agency, CORDIO, IRD, UdC, AIDE	2021-2026 Mitsamiouli-Ndrou?, Coelacanthé, Shissiwani and Mohéli National Parks	Capacity development for the NP Agency and UdC for biodiversity monitoring and knowledge of priority ecosystems and species (sub-outputs 1.1.3, 2.1.2), data analysis and database management (sub-output 2.1.1), Biodiversity Monitoring Training Centre (including material and equipment) in Mohéli NP to serve all MPAs (sub-output 2.1.2), Rapid surveys and updating of marine biodiversity inventories and maps of each MPA (sub-outputs 2.1.2, 2.1.3, 2.4.1), Monitoring program for adaptive management of coral reefs, fisheries, turtles, mangroves and seagrass beds (sub-outputs 2.1.2, 2.1.3), Assessments of NP's management effectiveness with the managers of two MPAs and development of annual action plans and work plans for each site (sub-output 2.2.1), Support village committees on compliance and co-management issues (sub-output 1.1.4, output 2.3).
<b>Ecosystem-based Adaptation in the Indian Ocean</b>	GCF / DGEF /MAFETH	2021-2030 Karthala National Park	Ecosystem profile and support for the implementation of ecosystem-based actions by civil society (output 1.2) (ii) Knowledge management for sustainability and replication (output 4.2).
<b>Climate-resilient water supply in Comoros</b> / Strengthen the climate resilience of drinking and irrigation water in 15 of the most vulnerable areas to the risks related to climate change in the Union of the Comoros	GCF /UNDP /DGEF /MAFETH	2019-2027 Karthala, Coelacanthé, Mont-Ntringui and Mohéli National Parks	Development of source water protection areas (sub-output 2.2.3)

Project / Objective	Donor / Implementation Partner	Period and site of intervention related to the project	Complementarities
<b>WIOSAP ?</b> Implementation of the strategic action programme for the protection of the Western Indian Ocean from land-based sources and activities	UNEP / Nairobi Convention / DGEF	2020-2022 Shissiwani National Park	Training of fishers in monitoring reefs and mangroves (sub-output 2.1.2), reforestation of the Ilot de la Selle (sub-output 2.2.3)
<b>AFIDEV Project</b> / Improve cash and vegetable crops through agroecological production systems, their added value, and strengthen the dialogue between the different actors in the value chains.	AFD	2020-2024 Moh?li, Karthala and Mont Ntringui National Parks	Development of sustainable livelihoods for local communities (Outcome 3)
<b>Comoros integrated tourism framework project</b> / Supporting communities in the development of ecotourism in the Comoros	AFD	2019-2023 Karthala and Mont Ntringui National Parks	Construction of 2 ecotourism bungalows and training local communities in the management and administration of a microenterprise (sub-output 3.2.1).
<b>Resilience and integrated watershed management project</b> / Stemming watershed degradation exacerbated by climate change on the three islands	GEF/ UNEP	2017-2022 Moh?li, Karthala and Mont Ntringui National Parks	Planning areas to restore (Outputs 1.2 and 2.2) rehabilitation of degraded watersheds in particular through reforestation, conservation of species and control of erosion (Output 2.2)
<b>Geothermal Project</b> / Develop a power plant powered by geothermal resources and reduce GHG emissions	New Zealand Government, UNDP-Comoros, African Union (Geothermal Risk Mitigation Facility)	2019-2024 Karthala National Park	Legislative framework for the development and exploitation of renewable energies (sub-output 1.1.1) Potential partner for the mobilization of recurring financial resources for the Comoros Environmental Fund (Output 1.3)
<b>Women's financial empowerment</b> / Develop IGAs, limit losses and ensure food security	GEF/ UNEP UNDP /AfDB	2021-2022 C?lacanthe, Shissiwani and Mont Ntringui National Parks	Promotion of the socio-economic inclusion and entrepreneurship of the women of the regions of the Mont-Ntringui, Shissiwani, and Coelacanthe national parks, and capacity building in management of associative activities (outputs 3.6 and 4.1) including women involved in the selling and processing of fishery products.

Project / Objective	Donor / Implementation Partner	Period and site of intervention related to the project	Complementarities
<b>Establishment of the plastic waste recovery and redemption centre in Moh?li</b> / Reduce the volume of waste that pollute the oceans and areas of ecological interest and create sustainable economic activities through waste recovery for the benefit of the communities of the Moh?li Biosphere Reserve.	UNDP/Ocean Innovation Challenge	2021-2022 Moh?li National Park	Restoration of coastal marine ecosystems (output 2.2) and development of sustainable IGAs helping to reduce pressures on ecosystems and biodiversity (Outcome 3)
<b>Resilience of Fishing Communities/</b> Increase the resilience of fishing communities in coral reefs in Kenya, Madagascar, Comoros, Mauritius and Seychelles	Japan Government / FAO	Mitsamiouli-Ndroud?, Coelacanth, Shissiwani and Moh?li National Parks 2021-2024	Increasing sustainable production and marketing of small-scale fisheries, dialogue to strengthen the coherence of fisheries and environment sector policies and strategies to encourage sustainable investment, promotion of blue economy (sub-outputs 1.2.3, 1.2.4, output 2.2, outcome 3).

#### 7. Consistency with National Priorities

Describe the consistency of the project with national strategies and plans or reports and assessments under relevant conventions from below:

NAPAs, NAPs, ASGM NAPs, MIAs, NBSAPs, NCs, TNAs, NCSAs, NIPs, PRSPs, NPFE, BURs, INDCs, etc.

The Project is consistent with, and contributes to the implementation of a number of national policies, strategies, and plans focused on conservation and sustainable development in the Comoros, including:

- the National Biodiversity Strategy and Action Plan (2016) under UNCBD across all five strategic goals which are to (a) Reduce the root causes of biodiversity loss, (b) Reduce direct pressures on biological diversity and encourage sustainable use, (c) Safeguard ecosystems, species and genetic diversity, (d) Enhance the benefits for all derived from biodiversity and ecosystem services, and (e) ensure participatory planning, knowledge management and capacity building;

- the Comoros's Protected Area Expansion Strategy (2017-2021)[1];

- the Government's strategic *Plan Comores Emergent 2030* of which the blue economy is one of the 5 bases and includes the rational management of natural resources, the conservation of biodiversity and the enhancement of ecosystem services through concerted ecosystem management;

- the Accelerated growth and sustainable development strategy (SCA2D) 2018-2021 which one of the four objectives is to ensure the rational exploitation of natural resources, in compliance with the principles of sustainable development, while taking into account climate change;
- the Tourist Sector Strategic Plan (2019-2035) which namely targets the development of PA-related ecotourism;
- the project is also consistent with the National Adaptation Programme of Action being implemented in the country.

---

[1] Stratégie d'Expansion du Système National des Aires Protégées aux Comores (2017-2021)

## **8. Knowledge Management**

**Elaborate the "Knowledge Management Approach" for the project, including a budget, key deliverables and a timeline, and explain how it will contribute to the project's overall impact.**

The knowledge management component will be the lever on which the project will build to expand and replicate the interventions and impacts across the PA network, based on the learnings in intervention sites and individual PAs and their dissemination across the network, the country and among SIDS of the region. The knowledge supporting biodiversity conservation and ecosystem services in the PAs will be collected and managed via the monitoring systems implemented under the project's components, including:

The annual monitoring of the implementation and results of the PA land use master plans (product 1.2) and restoration plans (product 1.2.3), will enhance coordination of multiple partners interventions in PAs, ensure key biodiversity areas are preserved and allow to assess the success of conservation and restoration strategies and adapt them as needed. Restoration must be monitored not only in terms of intervention areas, but also in terms of success rate, to be able to adapt interventions if not fully successful.

Monitoring grievances filed by stakeholders (product 1.1.4) on an ongoing basis will contribute to ensure the social acceptability of project interventions, address local communities' concerns and priorities and nurture this partnership essential to the project success.

Estimating carbon stocks (product 2.4.1) in forests, mangroves, coral reefs and seagrass beds in the first year of the project will provide the baseline data required to assess the feasibility to access carbon markets through global mechanisms and include this approach into the resource mobilization strategy of the Comoros Environment Fund which is the financing mechanism for the protected areas system, or as an incentive to encourage local communities involvement in the protection of PAs ecosystems.

Monitoring biodiversity in the PAs (product 2.1.2) will enable assessing the effectiveness of the management of protected areas on a yearly basis and provide a basis to adapt management plans to better protect species and ecosystems.

Monitoring the condition of stands or populations of the resources used in value chains (medicinal and aromatic plants and fish resources) and the social and environmental impact of ecotourism activities



conducted in PAs will enable the adjustment of activities and resource use levels. The monitoring of resources used in value chains will be done b

Furthermore, the outcome 5 which aims at increasing opportunities will draw on data collected by these systems, disaggregated by gender and disability status, to develop gender- and disability-sensitive knowledge products. The project will also communicate and disseminate lessons and experiences from the PAs to encourage and support the large-scale adoption of conservation, sustainable use and biodiversity measures and of sustainable fishing and collection practices. Monitoring and evaluation (M&E) of progress compared to expected results and products will make it possible to integrate the information generated and to adopt an adaptive management approach to ensure that the project's goals and objectives are achieved.

Under Output 4.1, the technical knowledge and lessons learned from the project's experiences through participatory annual monitoring and assessment processes, midterm review and terminal evaluation will be compiled and translated into knowledge products and will be used to increase the effectiveness of project implementation and disseminated locally (among the project sites), across the Comoros and among regional SIDS to strengthen the capacity of all actors involved in biodiversity conservation.

The project will help to develop knowledge on issues that are specific and new to the Comoros, namely on forest ecosystem restoration techniques, control of exotic invasive species, partnerships between local communities and the private sector within value chains based on the sustainable use of natural resources from the PAs (non-timber forest projects (NTFP) and fishing products), development of ecotourism value chains that focuses simultaneously on biodiversity, local communities and their culture, and PA landscapes. This knowledge will also ensure that local communities, including women and PWD, benefit and that local communities are involved effectively in co-managing the PAs and their resources.

Costs of knowledge management are integrated as part of each component, mostly under component 4, and include the salary of the Monitoring and Evaluation and Safeguards Specialist over 5 years.

## **9. Monitoring and Evaluation**

### **Describe the budgeted M and E plan**

Monitoring and assessment of project implementation and progress will be conducted in accordance with GEF and UNDP guidelines and with the M&E plan described in Section VII of the Project Document, which includes indicative costs and timeframe. Total indicative cost for the implementation of the Monitoring and Evaluation Plan is \$193,021. The plan's key tasks involve: an inception workshop; annual monitoring of the project results framework; annual project implementation reports; annual audits; ongoing monitoring of social and environmental risks; ongoing monitoring of the stakeholder mobilization plan and the gender equity action plan; project steering committee meetings; meetings of the landscape co-governance mechanism; UNDP-GEF team supervision missions; GEF-7 mid-term and end-of-project baseline indicator updates; independent mid-term review; and the independent final evaluation.

A summary is provided in the following table:

<b>Monitoring and Evaluation Plan and Budget:</b>		
This M&E plan and budget provides a breakdown of costs for M&E activities to be led by the Project Management Unit during project implementation. These costs are included in Component 4 of the Results Framework and TBWP. For ease of reporting M&E costs, please include all costs reported in the M&E plan under the one technical component. The oversight and participation of the UNDP Country Office/Regional technical advisors/HQ Units are not included as these are covered by the GEF Fee.		
<b>GEF M&amp;E requirements</b>	<b>Indicative costs (US\$)</b>	<b>Time frame</b>
<b>Inception Workshops</b> (one per island)	15,000	Within 60 days of CEO endorsement of this project.
<b>Inception Report</b>	None	Within 90 days of CEO endorsement of this project.
<b>M&amp;E of GEF core indicators and project results framework</b> (incl. contributions of the PC/PA Expert, Conservateurs, Ecoguards, M&E-Safeguards Officer, and travel costs)	82,015	Annually, before the PIR, and at midterm and end of project.
<b>GEF Project Implementation Report (PIR)</b>	None	Annually typically between June-August
<b>Monitoring of the Environmental and Social Management Framework</b>	Included in budget (Salary of the M&E-Safeguards Officer)	On-going
<b>Supervision missions</b>	None	Annually
<b>Independent Mid-term Review (MTR)</b>	39,003	June 2025
<b>Independent Terminal Evaluation (TE)</b>	39,003	March 2027
<b>Translation of progress (PIRs) and evaluation reports (MTR and TE)</b>	14,000	Annually, and in June 2025 and March 2027
<b>Subtotal indicative COST (GEF)</b>	<b>189,021</b>	
<b>PCU Travel for documenting indicators of the PRF (TRAC co-financing)</b>	<b>4,000</b>	Annually
<b>TOTAL indicative costs (GEF + TRAC)</b>	<b>193,021</b>	

## 10. Benefits

**Describe the socioeconomic benefits to be delivered by the project at the national and local levels, as appropriate. How do these benefits translate in supporting the achievement of global environment benefits (GEF Trust Fund) or adaptation benefits (LDCF/SCCF)?**

Local socioeconomic benefits include i) the development of sustainable income-generating activities for 6,399 people, 50% of whom are women and 4% are PWD through sustainable nature-based value chains related to PAs, securing or increasing food provision through improved ecosystems health and improvements to local communities? production activities, including fishing and agriculture, and ii) increased capacity and opportunities to actively participate in the co-management of protected areas and resources and the valuation of the ecosystem goods and services they provide.

National socioeconomic benefits provided by the project include

i) preservation of assets for the development of tourism in Comoros including clean beaches and healthy ecosystems that support ecotourism, i.e. forests, coral reefs, and increased opportunities for tourism

operators such as hotel operators, restaurateurs and communities that offer community lodging facilities, and tourist guides,

ii) increased institutional capacities to co-manage PAs, ecosystems and species, and to preserve the country's development potential and the ecosystem goods and services that the PAs provide and on which the local populations, the private sector and the government rely, including provisioning services such as fisheries and wild aromatic and medicinal plants, provision of water in watershed areas, climate and flood regulation, provision of fertile soil, green manure, shade and moisture for agriculture, fodder for livestock, pollination, waste processing and assimilation (in mangroves), and cultural, aesthetic and spiritual services.

iii) increased capacities of the private sector and local community cooperatives to develop sustainable value chains based on resources from the PAs, and

iv) establishment of a national certification system for sustainable and equitable products from protected areas.

The 2016 National Strategy and Action Plan for Biodiversity emphasizes the importance, for human survival and well-being, of the essential services that biodiversity provides and concludes that biodiversity provides income to most of the population and constitutes the basis of the Comorian economy. Agriculture's share – including fishing and livestock breeding – of the national wealth has been estimated at more than US\$209 million, representing 41 percent of GDP and 90 percent of the country's export income. Fishing provides nearly 40 percent of animal protein for the population, most majority of whom live in a subsistence economy, employs approximately eight percent of the population, and provides five percent of the country's foreign currency. The ecosystem goods and services provided by coral reefs include 3,000 tons of reef fish/year, estimated at approximately US\$6.18 million. Tourism is not highly developed and contributes only around 10 percent to GDP. It offers only precarious, and nearly non-existent, benefits to local communities. However, the economic value of tourism services from the coral reefs in the marine area of Mohéli National Park is estimated at US\$3.5 million. This is equivalent to 1.3 percent of GDP, 15.2 percent of public investments, and 10.7 percent of exports of goods and services. The tourist value of all of the country's coral reefs is estimated at US\$8 million.

The component 3 of the project is focusing on partnerships between private businesses and community cooperatives directly or through the development or expansion of nature-based value chains and the strengthening of their capacities to ensure the sustainability and profitability of the livelihoods for local communities. It is expected that 6,399 people, 50% of whom are women and 4% are PWDs, will benefit from improved livelihoods through such sustainable nature-based value chains related to PAs. The project will first target vulnerable people whose resource use is detrimental to ecosystems (including fishers using nets or fishing on foot, people removing sand from beaches, and farmers cultivating under forest)

How do these benefits translate in supporting the achievement of global environment benefits (GEF Trust Fund) ?

Providing alternative livelihoods to local communities whose resource use is unsustainable will reduce pressures on coastal and forest ecosystems. Indeed, these people were met by the staff in charge of PA management and have expressed their willingness to give up their illicit activities as long as they can benefit from support to practice a profitable alternative activity. This will contribute to stabilize 17,564 ha

of primary and secondary forest, 197 ha of mangrove, 6030 ha of seagrass beds and 30,000 ha of coral reefs within the PA network, thus increasing the protection of the habitats for endemic and threatened biodiversity such as the Livingstone fruit bat, island-endemic Otus, marine turtles, the Mongoz lemur, the dugong, and marine species living in association with reefs. Reducing the collection of shoreline materials will contribute to the natural restoration of marine turtle nesting beaches. The development of these livelihoods will be an incentive to local communities to support and collaborate in the management of PAs, thus contributing to increase management effectiveness over 116,577 ha of existing terrestrial and marine/coastal protected areas which will lead, with the reduction of the rate of deforestation, to a reduction of the threats to endemic biodiversity in these areas and to increased mitigation of greenhouse gas emissions.

To ensure that the project generates local and global benefits, interventions are aligned with STAP guidance, including

? helping strengthen community land and resource tenure: the Project will contribute to clarify the issue of land tenure, particularly to ascertain the extent of community land ownership, or village terroirs, within the National Parks through output 1.2 on the development of master plans for terrestrial and marine/coastal areas within protected areas, and more specifically sub-outputs 1.2.1 on the participatory delineation and mapping of village terroirs within protected areas, the translation of the georeferenced coordinates of the PA boundaries and of zoning into local communities' own reference system, the 'lieux-dits', and 1.2.3 on the participatory planning of land/coastal and resource use, including the delineation of areas reserved for the harvesting of natural resources by local communities involved in value chains ? both planning processes will be supported by village co-management committees; these plans will be developed in parallel with strategic environmental and social assessments to ensure, inter alia, they do not restrict other people's legitimate access rights. In this way, National Park management plans will incorporate land tenure issues in the review of park management plans and all community engagement activities, in order to capture accurately tenure and community engagement in National Park management. The project will document the boundaries of the different zones as well as the conflict zones. Any physical demarcation will be carried out with the collaboration of local communities and will be limited to areas that are not the subject of any dispute. The documentation of conflicts will identify the nature of the conflicts, the disputed areas, and the communities or community members involved. While it is possible that the project might not have the means and time to resolve all the conflicts identified, this exercise will at least provide a common and updated basis for all concerned parties, including the National Parks Agency, communes and concerned village authorities, to work on jointly and resolve land disputes.

? promoting equitable benefits from wild resources through sub-output 3.3.2 focused on the *identification and implementation of partnership agreements that guarantee tangible and optimized benefits to community cooperative partners in the value chains*; support will be provided to value chains stakeholders to negotiate and develop long-term, mutually beneficial "win-win" partnership agreements and provide a framework for the development of value chains that guarantee a fair share of tangible benefits to partner communities; this principle must be reflected in the business models and support will be provided (as part of output 3.4 related to strengthening entrepreneurship capacities and the design of business models) to each business in designing or adapting their business model to incorporate the maximization of benefits to local communities through benefit-sharing rules so that the benefits derived from these value chains provide adequate incentives for local communities to comply with PA regulations;

? supporting effective community governance through capacity building and more specifically through interventions under the sub-output 1.1.4: *Recognition and consolidation of the effective involvement of men and women from local communities in the governance of protected areas*, including i) the explicit recognition of their rights and benefits related to natural resources in PAs and revision of village co-management agreements to include these rights and benefits, ii) the establishment of grievance redress mechanisms in each park and informing local communities and other stakeholders about the mechanism for registering, forwarding, evaluating and resolving grievances;

? and building local capacity to manage natural resources through sub-output 2.2.2: *Plans for the sustainable use of species targeted for the development of value chains*, where training will be provided to local communities on sustainable harvesting in the natural environment (harvesting techniques, quantities, frequency, period determined on the basis of the studies carried out by specialized biologist) and to enable their participation in the monitoring of the quantities harvested, the evaluation of the condition of the

exploited populations on the basis of simple indicators which will have been identified by a plant biologist or a fishery biologist, and decision-making regarding any required adjustment to harvest levels, including if necessary, putting an end to it. These trainings will be developed and provided on site by the biologists specialized in flora and fishing who will ensure a follow-up of these trainings after 6 months to ensure the good understanding of the shared concepts. The Ecoguards and Mobilizers of the relevant parks will also participate in these trainings in order to ensure an adequate supervision of the local communities on a continuous basis.

The likelihood of this project having positive conservation outcomes is supported by the long-term relationship between conservation stakeholders and local communities, which has helped build trust and open communication. The numerous discussions between the staff of the National Parks Agency and people who practice illicit activities that lead to the degradation of ecosystems and resources (for example net fishermen and sand collectors) confirm the latter's will to voluntarily cease these practices if they have the opportunity and the required support to develop and practice an alternative profitable activity. It is clear from these meetings that the local communities in each of the protected areas are largely favorable to PAs and aware of the importance of biodiversity conservation, through several years of successive interventions supported namely by UNDP, starting with the UNDP-GEF G32 project which established the Moh?li Marine Park and introduced the co-management concept, the UNDP-UNV CBO project (Community Base Organizations) which aimed to raise awareness and build the capacities of local communities to prepare them to co-manage the future protected areas in other sites, and then the project GEF ID 10351 which set up the protected areas system, including the establishment of 5 new PAs.

## 11. Environmental and Social Safeguard (ESS) Risks

Provide information on the identified environmental and social risks and potential impacts associated with the project/program based on your organization's ESS systems and procedures

### Overall Project/Program Risk Classification \*

PIF	CEO Endorsement/Approva I	MTR	TE
<b>High or Substantial</b>			

#### Measures to address identified risks and impacts

Elaborate on the types and risk classifications/ratings of any identified environmental and social risks and impacts (considering the GEF ESS Minimum Standards) and any measures undertaken as well as planned management measures to address these risks during implementation.

SESP Risks		
Risk	Assessment	Mitigation measures
<p>Risk 1: Project activities focused on strengthening and implementing management and governance regimes for the National Parks could impact current access to and use of natural resources. Enhanced governance, on-site management and enforcement of regulations regarding resource use in the National Parks may result in restrictions or changes in current resource use by a limited number of vulnerable users, with an associated impact on them, especially for net fishers and for people collecting sand on beaches.</p>	<p>I = 2 L = 3 Moderate</p>	<p>The impact of the project on access to the National Parks and resource use is considered to be low (the National Parks are de facto IUCN PA Category VI), but is flagged for concern, particularly regarding ensuring that community rights are not compromised by the project.</p> <p>To mitigate potential livelihood impacts resulting from Output 1.1, the project is designed to provide alternative income-generating livelihood options, first for vulnerable people, that will mitigate their losses in subsistence and other revenue as a result of restrictions on use imposed by the National Parks legislation.</p>

<p>Risk 2: Infringement of civil rights by police and ecoguards Poorly trained ecoguards may not conduct their tasks properly and inadvertently infringe on civil rights of the community.</p>	<p>I = 3 L = 2 Moderate</p>	<p>The project includes a training program for the ecoguards (Activity 2.1.2), that will focus on human rights training, a system of monitoring and compliance and a grievance redress mechanism (GRM) that is available to all community members. In addition, a Code of Conduct will be developed on which both the ecoguards and police officers involved in law enforcement (Activity 2.2.6) within the PAs will be trained.</p>
--	-------------------------------------	--

<p>Risk 3: Project activities to reinforce co-management of the Parks and create alternative income-generating activities may reproduce discrimination against women</p>	<p>I = 3 L = 2 Moderate</p>	<p>Women represent 27% of the staff of the Comoros Parks Agency, (17%) as <i>Conservateurs</i>, (25%) as Community mobilizers, and (28%) as Ecoguards to carry out all the functions required for the management of protected areas, including ecological monitoring and surveillance functions for the enforcement of regulations governing the protection and use of resources.</p> <p>Women in local communities are already systematically involved in all aspects of PA co-management. Each village included in the 5 new national parks has set up a village committee to co-manage the park on a voluntary basis to support initiatives in the park, for a total of 56 village committees each made up of 15 women and 15 men (the communities have agreed to respect the principle of gender parity).</p> <p>Project activities to create the National Parks network in the Comoros (UNDP PIMS 4950) included a strong participation of women in project design. Women's groups and associations were consulted extensively during preparation of the GEF7 PIF and as far as possible during the preparation of the ProDoc (though virtual communication given the constraints limiting travels and in person meetings), and specific requests were made to ensure that women, women's groups and associations would continue to be engaged and active co-developers of project activities, particularly as women are primary harvesters in some areas.</p> <p>A gender analysis was carried out during the PPG phase along with development of a gender mainstreaming plan to ensure that the needs of, and roles played by, women are considered in project design and implementation, and that women participate effectively in project activities. Gender analysis has taken into consideration women's use of natural resource (terrestrial and coastal) to identify any potential disproportionate impacts that project activities could have on women, together with proposed mitigation activities.</p> <p>The project will support alternative livelihood options for women fishing on foot and with mosquito nets through the implementation of an octopus fishing management system as developed by the SWIOFISH project in Mitsamiouli-Ndroué NP, based on the use of pots and the participatory delimitation of temporary no-take zones. This model has been adopted with great success by village communities in Shissiwani Park with the triple benefit of attributing the use of this resource to a village community (thus moving away from the situation of free access), of significantly increasing fish production when fishing reopens, and therefore increasing the income of fisherwomen, and of preserving coral reefs.</p> <p>A gender strategy was developed during PPG to build on this participation and lift potential constraints that might limit women's access to information, effective participation to decision-making, and their equitable chances to benefit from the project's contribution to local development.</p>
--	-------------------------------------	---



Risk 4: Project activities within the National Parks network across three islands of the Comoros, comprising both terrestrial and marine ecosystems and different biomes, to assist with enforcement of laws and regulations governing the use and management of resources in the National Parks are applied on-site, could restrict access to, and direct harvesting of, natural resources that provide livelihood options to communities. Project activities at pilot sites will target strengthening of law enforcement and application of new regulations concerning access to and harvest of targeted ecosystems and biodiversity, i.e. enforcement of NP regulations restricting unsustainable fishing, agricultural and logging

I = 4  
L = 3  
Substantial

Survey results (which can be found in the ESMF) show that most illicit activities are carried out by a relatively limited number of people and motivated by survival or as a lucrative business. The project strategy will address comprehensively the issue of unsustainable livelihoods by supporting the multiplication of IGA options based on sustainable uses of natural resources to offer sustainable livelihood opportunities in priority to vulnerable members of local communities in underprivileged villages, prioritizing those who voluntarily cease prohibited activities to abide by the new regulations implemented in PAs. The project provides for planning for the optimal use of land and resources across protected areas the delineation of zoning (Output 1.2), i.e. i) priority areas for the conservation of biodiversity and ecosystem functions, including priority areas to be restored, ii) areas open to controlled use of resources (in which controlled use of NTFPs may be permitted in accordance with the PAGs of each of the PNs), and iii) village lands within which local communities can carry out subsistence activities based on the sustainable use of natural resources. The permitted or prohibited activities and resource uses as well as the procedures for authorizing them will be specified and integrated into the management and development plans of the NPs. In order to address the risk on livelihoods, and as described in the Environmental and Social Management Framework (ESMF) prepared during the PPG, a Strategic Environmental and Social Assessment (SESA) will be undertaken in parallel to the planning process. During project implementation, Management Plans for the PA network, which will be developed under Output 2.2, will undergo a scope Environmental and Social Impact Assessment (ESIA) that takes into consideration livelihoods impact due to restricted access to natural resources. Impacts will be managed through implementation of an Environmental and Social Management Plan (ESMP) which will include, if needed, a Livelihoods Restoration Plan.

<p>Risk 5: Project activities to assist with the conservation of marine protected areas could affect the harvest of aquatic species for subsistence and/or commercial use by communities living within marine National Parks.</p>	<p>I = 3 L = 3 Moderate</p>	<p>For more than 20 years, it has been reported that the coastal area has been overexploited and that fishing activity is no longer profitable. Fish production is so limited that it is sold to customers directly at the landing point at prices inflated by the scarcity of the resource.</p> <p>Project will support communities living alongside the Marine National Parks to secure alternative legal livelihood options based on natural resources found within the coastal and marine ecosystems at target sites. Since their establishment, net fishing has been prohibited in MPAs. The fishers who practice this fishery were informed of this throughout the PIMS 4950 project and during the interviews carried out during the PPG phase. They have formulated their conditions to agree to comply with the new regulations, namely the purchase of their nets and support to develop new IGAs. The project will respond to the second request by providing support to fishers for the acquisition or manufacture of fishing gear in accordance with MPA regulations, i.e., traps allowing selective fishing (octopus, lobsters, crabs), longlines targeting demersal fish and fish concentrator devices (made from locally accessible materials), installed in deep zones to remove fishing pressure from the coastal zone, and on which fishers can line-fish. In addition, the project will support collaboration between the National Parks Agency, the National Directorate of Fisheries Resources and the fisher's unions to strengthen the capacities of fishers to become responsible co-managers on the basis of better knowledge of resources and understanding their vulnerability and that of their habitat, and participating effectively in the decision-making process to establish sustainable management measures for exploited fishery resources, including monitoring of catches and fishing effort. Management measures may include temporary closures of fishing areas. This approach, implemented for octopus fishing with the support of Blue Ventures and Dahari in two villages in the Shissiwani NP in Ndzuani, allowed a biological rest and better growth of the resource, greatly improved the income from the fishery when it reopened and thus generated very strong support from fishing communities.</p> <p>During project implementation, an ESIA will be undertaken prior to during the feasibility study (Activity 3.1.1) and an ESMP will be developed to manage the impacts on livelihoods (FS for developing or expanding nature-based value chains).</p>
---	-------------------------------------	---

<p>Risk 6: Harvesting of natural resources may have a negative impact on the terrestrial ecosystem through depletion of resources. If not managed properly, harvesting of natural resources, including medicinal and aromatic plants, for commercial purposes may lead to depletion of these resources and have an overall negative impact on the fragile ecosystem.</p>	<p>I = 3 L = 3 Moderate</p>	<p>Best practices have been identified and integrated in the project activities to avoid or mitigate any potential negative impact of project interventions on the PA ecosystems and resources. Any project initiative to develop a livelihood activity based on the use of natural resources or ecosystems (such as ecotourism, collection of medicinal and aromatic plants) (Activity 3.1.1) will be subject to a scoped ESIA that will assess the capacity of the resources or the environment to support a certain level of use. Management measures will be developed and integrated into the ESMP to ensure the sustainability of the use of the targeted resources and environments to support the development of livelihoods.</p> <p>As part of Activity 1.3.3, the feasibility assessment of commercial water harvesting will take into consideration environmental and social impacts, including impact on the the natural ecosystem and water balance in the area.</p> <p>As mentioned earlier, the Management Plans for the PA network that will be revised in Output 2.2 will undergo an ESIA that will consider impact of resources depletion and propose mitigation measures in the ESMP. The assessment of the various ecosystems capacities to satisfy basic daily needs requires complex evaluations that will be conducted as part of the project prior to the development of any IGA based on the use of a natural resource, such as medicinal and aromatic plants and fish resources (rock lobsters, crayfish, mangrove crabs, demersal fish) to evaluate sustainable collection levels for specific sites.</p>
--	-------------------------------------	--

<p>Risk 7: Introduction of invasive alien species from reforestation and other land restoration activities Inappropriate selection of species for reforestation activities may inadvertently lead introduction of invasive alien species that may compete with indigenous and vulnerable species.</p>	<p>I = 3 L = 2 Moderate</p>	<p>The master plans for terrestrial and marine areas in the PAs (Activity 1.2.3) will be undergo a SESA that will assess the potential impact of reforestation within the PAs and propose measures and guidelines that will eliminate the risk of introduction of invasive alien species during these activities. Protocols for reforestation planned under Activity 2.2.4 is subject to the ESIA that will be undertaken for the management plans that will be developed for the PAs. These will include measures within the ESMP and conditions in the developed protocols that eliminate the risk of the introduction of invasive alien species.</p>
<p>Risk 8: Risk of private sector enterprises involved in the project engage in activities that lead to environmental pollution and biodiversity resource depletion</p>	<p>I = 4 L = 2 Moderate</p>	<p>The project will facilitate partnerships between local community and the private sector (local hotels and restaurants) who may be engaged in activities such as improper wastewater disposal and that lead to pollution or may encourage overexploitation of natural resources leading to depletion.</p>

<p>Risk 9: Climate change could impact the islands of the Comoros with anticipated alterations in rainfall, sea level rise, coastal erosion, increased intensity of cyclones, as well as by volcanic activity which will place an additional burden on the already stressed natural environment and compromise the success of project activities and put communities at risk. Climate change is a risk for the already vulnerable Comoros islands and in the protected areas, placing local communities' livelihoods at risk, thereby compromising successful achievement of the project's objective. The ESMF includes a list of sites within PAs where such risks have been documented.</p>	<p>I = 4 L = 3 Substantial</p>	<p><u>Project interventions related to reducing these risks:</u></p> <ol style="list-style-type: none"> <li>1. Planning for the optimal use of land and resources within PAs (Output 1.2) will take into account areas vulnerable to the risks of erosion, flooding and landslides and ensure that no infrastructure or housing is built there. These maps will identify priority areas for the restoration of natural forests, which will improve the consistency of future interventions by different development partners. This will be addressed through the SESA that will be undertaken in parallel with the planning activities.</li> <li>2. Strengthening the protection and improvement of land and resource management (Activity 2.2.4), including the restoration of degraded natural forests, will strengthen the resilience of these ecosystems to the risks of natural hazards linked to climate change. In addition, the ESIA that will be undertaken for the Management Plans that will be revised and developed will address this issue and propose mitigation and adaptation measures in the ESMP.</li> <li>3. Strengthening the protection of the complex of coastal ecosystems (Activity 2.2.4) made up of associations of coral reefs, seagrass beds and mangroves will increase their resilience through the synergistic effects of the conservation of these ecosystems for their conservation and for the protection of the coastline in the face of coastal erosion. the ESIA that will be undertaken for the Management Plans that will be revised and developed will address this issue and propose mitigation and adaptation measures in the ESMP.</li> </ol> <p>The project will work in collaboration with the GCF-UNDP project on watershed management (\$ 50M grant) which includes reforestation programs as well as with other partners such as AFD, Dahari, Association Deux-Mains, who invest in reforestation within national parks. The coordination of ecosystem restoration interventions will be facilitated through the development of an optimal land use plan which will, among other things, identify priority sites for reforestation.</p>
---	--	--

<p>Risk 10: Pilot interventions for the restoration of degraded forests through controlling invasive alien plant species could involve the application of herbicide on cut stumps that may have a negative effect on the environment or human health</p>	<p>I = 3 L = 2 Moderate</p>	<p>Limited impact in terms of magnitude (small affected area and low number of people affected, and short duration). The probability of the Project having a negative impact on the National Parks due to the use of the chemical is low.</p> <p>Activities to mitigate potential impacts related to the application of herbicides (Activity 2.2.5) to control a specific alien invasive species will include the following:</p> <ul style="list-style-type: none"> <li>- This technique will limited to the control of only one species</li> <li>- Planning of pilot operations on prioritized and delimited sites</li> <li>- Systematic monitoring of pilot operations and results</li> <li>- Training ecoguards by an international expert (who developed these techniques and has extensive field experience) on IAS control techniques and specifically on the use of herbicides in combination with the cutting of IAS</li> <li>- Designation of team leaders responsible for supervising field operations and particularly the application of this technique</li> <li>- Supply of appropriate protective equipment, masks and gloves and supervision of their systematic use</li> </ul>
<p>Risk 12: Project activities to assist communities with alternative income generating activities will involve the development of partnerships with the private sector involved in ecotourism to develop circuits that include sites of cultural interest and significance.</p>	<p>I = 3 L = 2 Moderate</p>	<p>There are few sites of cultural significance within the protected areas. One site in the Karthala NP is well known, the sawmill and residence of Mr. Humblot in Nyumbadju which date from the end of the 19<sup>th</sup> century. As part of the development of ecotourism circuits focused on biological and cultural heritage (Activity 3.1.1), the project will work with the CNDRS and the Tourism National Directorate to identify all cultural and sensitive sites that are located within the NP and strengthen their recognition (if appropriate) and protection. This will be included in the ESIA planned for this activity.</p> <p>Being included in a PA already gives these sites some form of protection, but sites and infrastructure require more protection to prevent non-compliant renovations from degrading their heritage value. To strengthen the protection of the heritage value of cultural sites, they will be integrated into the ESMP and subsequently the development of Management Plans of national parks.</p> <p>The officers responsible for heritage protection at the island level will be involved in the co-management of PAs. The Secretary General of the UNESCO representation in the Comoros is a member of the Protected Areas Agency but the island representatives in charge of cultural heritage should be members of the co-management committees of each of the PAs to ensure that protection of cultural heritage is taken into account.</p>

<p>Risk 13: Project activities to enhance the regulatory framework for management of the National Park network could impact on traditional land tenure arrangements at the targeted project sites</p>	<p>I = 2 L = 2 Low</p>	<p>The Project will strengthen institutional and regulatory frameworks to manage the National Parks and will contribute to clarify the issue of land tenure, particularly to ascertain the extent of community land ownership, or village terroirs, within the National Parks. In this way, National Park management plans will incorporate land tenure issues in the review of park policy and strategy as well as in the revision of park management plans and all community engagement activities, in order to capture accurately tenure and community engagement in National Park management.</p> <p>This issue will be addressed through the clarification of the tenure issues within the PAs, the refinement of the delineation of village terroirs within PAs under component 1, demarcation of the boundaries with landmarks built with the participation of local community members, and finally - at the request of village communities- the translation of the georeferenced coordinates of the PA boundaries and of the different zones, into their own reference system, the ?lieux-dits?.</p> <p>The project will document the boundaries of the different zones as well as the conflict zones. Any physical demarcation will be carried out with the collaboration of local communities and will be limited to areas that are not the subject of any dispute. The documentation of conflicts will identify the nature of the conflicts, the disputed areas, by which community or which members of these communities.</p> <p>Inter-community conflicts relating to the delimitation of contiguous terrestrial village lands are more frequent on the Ngazidja island. Also, the communes have been delineated within the framework of a project supported by the EU, but some problems related to the definition of communal land versus farmland remain.</p> <p>It is possible that the project does not have the means and the time to resolve all the conflicts identified, but this exercise will at least provide a basis for reflection so that all the parties concerned work on a common and updated basis with the Agency of PAs and communes to jointly resolve land disputes.</p>
---	--------------------------------	--

<p>Risk 14: Working conditions in private sector entities engaged in the project are in contravention to principles and standards of ILO fundamental conventions. Workers at the private entities engaged in the project may be denied freedom of association and collective bargaining and exposed to discriminatory working conditions and/or lack of equal opportunities, as well as exposed to health and safety risks during their work.</p>	<p>I = 4 L = 2 Moderate</p>	<p>All private sector entities that will be engaged throughout the project, particularly under Activity 3.1.1, Activity 3.4.1 and Output 3.3, will undergo a private sector risk assessment (supplemented by a SESP) to ensure they are in line with SES.</p>
---	-------------------------------------	---

**Supporting Documents**

Upload available ESS supporting documents.

Title	Module	Submitted
<p><b>Annex_5_UNDP Social and Environmental Screening Procedure _SESP_</b></p>	<p><b>CEO Endorsement ESS</b></p>	



**ANNEX A: PROJECT RESULTS FRAMEWORK (either copy and paste here the framework from the Agency document, or provide reference to the page in the project document where the framework could be found).**

**The project will contribute to the following Sustainable Development Goals:** Goal 1 ? End poverty in all its forms everywhere (1.4 Access to resources and 1.5 Reduction of vulnerability); Goal 5 ? Gender equality and empowerment (5.5 Participation of women); Goal 6 ?Sustainable management of water (6.6 Protection and restoration of ecosystems); Goal 8 ? Sustained, inclusive and sustainable economic growth, productive employment and decent work for all (8.3 Micro and small enterprises, 8.4 Efficient use of resources); Goal 12 - Sustainable consumption and production (12.2 Sustainable management of natural resources, 12.8 Training and environmental information, 12b Sustainable tourism); Goal 13 ? Combat climate change and its impacts (13.1 Resilience and adaptation); Goal 14 ? Conserve and sustainably use marine resources (14.2 Marine and coastal ecosystems, 14.4 Fisheries regulations, 14.5 Preservation of marine areas, 14.7 Small Island States, 14b Preservation of artisanal fishing); and Goal 15 ? Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, and halt biodiversity loss (15.1 Terrestrial ecosystems, 15.2 Forest management, 15.4 Mountain ecosystems, 15.5 Biodiversity and threatened species, 15.7 Poaching, 15.8 Invasive species, 15a Financing for biodiversity).

**This project will contribute to the following country outcome included in the UNDAF/Country Programme Document:** Outcome 1 - By 2026, state and non-state actors, the Comorian population, especially the most vulnerable, will strengthen their resilience to climate change, natural disasters and crises and ensure a sustainable and integrated management of terrestrial and marine ecosystems as well as associated ecosystem goods and services, in a context of promoting sustainable habitat with a low environmental footprint.

**This project will be linked to the following results of the UNDP strategic plan:** Output 1.4.1.2: Natural resources managed under a regime of sustainable use, conservation, access and benefit-sharing

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
--	----------------------------------	----------	-----------------	-----------------------

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
<p><b>Project Objective:</b> Conserve the terrestrial and marine biodiversity of the Union of the Comoros by strengthening the effectiveness of the co-management of the new network of protected areas with local communities to support sustainable development.</p>	<p><i>Mandatory indicator 1:</i> Number of direct beneficiaries, disaggregated by sex and PWD, benefiting from project interventions, through i) livelihoods created or improved based on the sustainable development of natural resources and ecosystem services within protected areas, ii) the development of their capacities to actively participate in the co-management of protected areas and the valuation of the ecosystem goods and services they provide (institutional, community and private sector actors). (<b>GEF-7 Core indicator #11</b>)</p>	0	<p>i) IGA development beneficiaries: 6399 (<i>on the basis of 5.4 persons per household</i>), including 50% of women and 4% of PWD ii) Beneficiaries of trainings: total of 2049 of which 40% women and 2% PWD, including: 60 members of the PA Agency + 264 members of park co-management committees and 1680 members of village committees + 10 DGEF officers + 35 people in the private sector</p>	<p>IGA development beneficiaries: 6399 (<i>on the basis of 5.4 persons per household</i>), including 50% of women and 4% of PWD ii) Beneficiaries of trainings: total of 2049 of which 40% women and 2% PWD, including: 60 members of the PA Agency + 264 members of park co-management committees and 1680 members of village committees + 10 DGEF officers + 35 people in the private sector</p>

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
	<p><i>Mandatory indicator 2 (from the IRRF ? 1.4.1.2b):</i></p> <p>Area of existing protected areas with improved management (hectares)</p> <p>a) Area of terrestrial protected areas with improved management efficiency (<b>GEF-7 Core indicator 1.2</b>) as shown by the evolution of the METT scores of the Karthala, Mont Ntringui and Moh?li National Parks (land portion)</p> <p>b) Area of marine coastal protected areas with improved management efficiency (<b>GEF-7 Core indicator 2.2</b>) as shown by the evolution of the METT scores of the C?lacathe, Mitsamiouli-Ndroud?, Shissiwani and Moh?li National Parks (marine portion)</p>	<p>0 ha</p> <p>a) 0</p> <p>from baseline METT values</p> <p>Moh?li: 59</p> <p>Karthala: 53</p> <p>Mont Ntringui: 47</p> <p>b) 0</p> <p>from baseline METT values</p> <p>Moh?li: 59</p> <p>C?lacathe: 43</p> <p>Mitsamiouli-Ndroud?: 40</p> <p>Shissiwani: 53</p>	n.a.	<p>116,577 ha</p> <p>a) 61,815</p> <p>b) 54,762</p>

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
	<p><i>Indicator 3:</i> Net loss of ecosystem area in primary and secondary forests, mangroves, coral reefs and seagrass beds within the national park network (<i>Indicator 1.1.1 of UNDP Country Programme</i>)</p>	<p>Forest cover of 17,564.9 ha including 14,291.8 ha of primary forest and 3273.1 ha of secondary forest Mangrove cover: 197.25 ha Seagrass beds cover: 6030 ha Coral reef cover: 30,000 ha of which 18,000 ha in good health) (2020 values)</p>	No net loss	No net loss
	<p><i>Mandatory indicator 4:</i> GHG emissions avoided through restoration of forests and reducing the rate of deforestation in protected areas. <b>(GEF-7 Core indicator 6 ? Greenhouse gas emissions mitigated (metric tons of carbon dioxide equivalent)</b></p>	0	n.a.	4,768,755 tCO <sub>2</sub> eq of GHGs corresponding to a reduction in the deforestation rate over 17,564 ha and natural habitat restoration over 6,871 ha, including 6,800 through ANR and 53 ha through reforestation
<b>Component 1.</b>	<b>Institutions and governance systems</b>			
<b>Outcome 1.</b> Systemic, institutional, technical and operational capacities	<p><i>Indicator 5:</i> PA co-management</p>	a) DGEF: 1: 89%	n.a.	a) DGEF: 1: 89%

	<b>Objective and outcome indicators</b>	<b>Baseline</b>	<b>Mid-term target</b>	<b>End of project target</b>
strengthened to ensure effective management of the national network of protected areas	<p>capacities:</p> <p>a) Evolution of the institutional capacities of the protected areas management agency and the DGEF, as measured by the UNDP scorecard on capacity development for GEF projects:</p> <p>1: Mobilization capacities</p> <p>2: Capacity to generate, access and use information and knowledge</p> <p>3: Capacity to develop strategies, policies and laws</p> <p>4: Capacities for management and implementation</p> <p>5: Monitoring and evaluation capacities</p> <p>b) Evolution of the capacities of National Parks Co-Management Committees and Village Committees to contribute to the planning of the management of national parks, to its implementation and to the evaluation of its effectiveness</p> <p>c) Evolution of the capacity of the Board of Directors of the Comoros National Parks Agency and of the FEC to fulfill their mandate</p>	<p>2: 67%</p> <p>3: 78%</p> <p>4: 67%</p> <p>5: 50%</p> <p>PA National Agency:</p> <p>1: 56%</p> <p>2: 53%</p> <p>3: 56%</p> <p>4: 67%</p> <p>5: 33%</p> <p>b) t.b.d. during the 1st year of the project</p> <p>c) t.b.d. during the 1st year of the project</p>		<p>2: 80%</p> <p>3: 89%</p> <p>4: 83%</p> <p>5: 67%</p> <p>PA National Agency:</p> <p>1: 78%</p> <p>2: 80%</p> <p>3: 67%</p> <p>4: 83%</p> <p>5: 67%</p> <p>b) t.b.d. during the 1st year of the project, according to the reference value</p> <p>c) t.b.d. during the 1st year of the project, according to the reference value</p>

	<b>Objective and outcome indicators</b>	<b>Baseline</b>	<b>Mid-term target</b>	<b>End of project target</b>
	<i>Indicator 6:</i> Evolution of funding dedicated to the management of the PA system measured by the following elements: a) Estimated annual financial gap to support the PA system under a basic PA management scenario (USD)	a) 1,281,759 USD	a) The gap is reduced by approx. 10% by project mid-term	a) The gap is reduced by approx. 40% by the end of the project
	b) Evaluation scores of the funding system for the following components: i) Legislative and institutional frameworks ii) Business plans and tools for cost-effective management iii) Income generation tools by PAs	i) 42% ii) 36% iii) 23%	n.a.	i) 50% ii) 65% iii) 30%
	c) Funds mobilized as an endowment for the Comoros Environmental Fund for protected areas (in connection with UNSDCF Indicator 1.7)	c) 0 USD	c) 1,000,000 USD	c) 5,000,000 USD

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
Outputs to achieve Outcome 1	<p><b>Output 1.1</b> The capacity of the new PA agency (Comoros National Parks), the DGEF, and the co-management committees to implement and enforce laws, regulations, and management systems related to the PA network is strengthened.</p> <p><b>Output 1.2</b> Master plans for terrestrial and marine areas within PAs harmonize relevant sectoral plans and strategies (fisheries, agriculture, forestry, tourism) with biodiversity and ecosystem service conservation priorities, and reduce inter-community conflicts.</p> <p><b>Output 1.3</b> An investment framework and financing strategy is developed and implemented to support the long-term management of the PA system</p> <p><b>Output 1.4</b> Strengthened participation of institutional partners and the private sector in supporting the national PA system and the implementation of PA development and management plans through the establishment of long-term partnerships</p>			
<b>Component 2.</b>	<b>Capacities for co-management of the national PAs network at site level</b>			
<b>Outcome 2</b> Increased protection of endemic and key species and habitats through improved management effectiveness across the national PA Network	<p><i>Indicator 7:</i> Area (hectares) of forest ecosystems restored in terrestrial PAs (GEF-7 Core indicator 3.2) through: i) assisted natural regeneration (ANR) ii) reforestation with native species iii) control of invasive alien species (IAS) for the following NP a) Karthala b) Mont Ntringui c) Moh?li</p>	<p><b>Total: 29.6 ha</b> a) Karthala i) 0 ii) 15.6 ha iii) 0 b) Mont Ntringui i) 0 ii) 9.5 ha iii) 0 c) Moh?li i) 0 ii) 4.5 ha iii) 0</p>	<p><b>Total: 6860 ha</b> a) Karthala i) 3000 ha ii) 25 ha iii) 6 ha b) Mont Ntringui i) 800 ha ii) 11 ha iii) 6 c) Moh?li i) 3000 ha ii) 6 ha iii) 6 ha</p>	<p><b>Total: 6871 ha</b> a) Karthala i) 3000 ha ii) 30 ha iii) 6 ha b) Mont Ntringui i) 800 ha ii) 15 ha iii) 6 ha c) Moh?li i) 3000 ha ii) 8 ha iii) 6 ha</p>
	<p><i>Indicator 8:</i> Number of beaches</p>	<p>a) Mitsamiouli -Ndroud?: 4</p>	<p>a) 2 beaches, 400 m3</p>	<p>a) 0 beach, no extraction</p>

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
	subjected to sand exploitation in MPAs and total annual volume of sand extracted from beaches and evacuated by truck for the following National Parks a) Mitsamiouli-Ndrou? b) C?lacanthe c) Shissiwani d) Moh?li	beaches, 800 m3 b) Coelacanth: 3 beaches, 480 m3 c) Shissiwani: 15 beaches, 2880 m3 d) Moh?li: 5 beaches, volume t.b.d.	b) 1 beach, 200 m3 c) 8 beaches, 1640 m3 d) 3 beaches, volume t.b.d.	b) 0 beach, no extraction c) 2 beaches, 400 m3 d) 1 beach, 200 m3
Outputs to achieve Outcome 2	<p><b>Output 2.1</b> Protocols for biodiversity monitoring and data collection are developed and applied, including the operationalization of a national database on biodiversity.</p> <p><b>Output 2.2</b> Management tools (including management plans for key terrestrial and marine species used) are drafted, approved and implemented in the PAs</p> <p><b>Output 2.3</b> Effective community-based co-management models and partnerships are identified, documented, evaluated, adapted and applied at specific sites within the PA network</p> <p><b>Output 2.4</b> Blue and green carbon stocks assessed and monitored across the PA network</p>			
<b>Component 3.</b>	<b>Community livelihoods within the national protected area network</b>			
<b>Outcome 3.</b> Through capacity building and partnership, directly or within value chains, private companies and local	<i>Indicator 9:</i> Number of beneficiaries within	0	n.a. (preliminary stages of	1,185 beneficiaries incl. 54% of



	Objective and outcome indicators	Baseline	Mid-term target	End of project target
communities generate new sources of income based on the sustainable valuation of ecosystem goods and services within PAs	<p>local communities in national parks, disaggregated by gender and disability status (PWD), who report at least a 25% increase in baseline incomes from adoption of sustainable livelihood options, thanks to new partnerships established with private companies that promote ecosystem goods and services within PAs, including fishers on foot, with cloth, with nets, beach sand collectors, and farmers practicing cultivation in the forest, for the following value chains:</p> <p>a) moringa  b) aromatic and medicinal plants  c) ?clean beaches?  d) ecotourism  e) fishers using longlines, fish concentrating devices (FCD), and those fishing for lobster, mangrove crab, crayfish, and octopus</p>		consultation, establishment of cooperatives, training, assessment of resources and of the viability of enterprises in partnership with local communities, including scoped EIAs)	<p>women, 1,8% PWD and 12% youth overall report at least a 25% increase in baseline incomes from adoption of sustainable livelihood options</p> <p>a) 100 women collecting moringa, incl. 10% PWD  b) 100 women collecting aromatic and medicinal plants  c) 70 young men and 30 young women for ?clean beaches, incl. 10 PWD  d) 30 men and 270 women in ecotourism activities  e) 485 men and women fishers in networks with restaurants and hotels, incl.:</p> <p>Longline: 150 men  FCD: 200 men  lobster: 30 men  mangrove crab: 30 women  crayfish: 15 men, 15 women  octopus: 45 women</p>

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
	<p><i>Indicator 10:</i> Condition of populations or stands of natural resources which are subject to sustainable development by local communities in project intervention sites within PAs, including medicinal and aromatic plants in the natural environment, moringa, demersal fish, lobsters, crayfish, octopus and mangrove crabs</p>	<p>t.b.d. during the 1<sup>st</sup> year of the project under Output 2.2, Sub-output 2.2.2. (will include: - extent and density of plant stands in the exploited patches - catch per unit of fishing effort for aquatic resources in target fishing areas)</p>	<p>Maintenance or improvement of the condition of plant or aquatic resource populations</p>	<p>Maintenance or improvement of the condition of plant or fish resource populations</p>
	<p><i>Indicator 11:</i> Number of partnerships</p>	<p>0</p>	<p>At least 5</p>	<p>At least 5</p>

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
	<p>between local cooperatives and private companies for the development and certification of value chains based on ecosystem goods and services provided by PAs and integrating biodiversity conservation and fair-trade principles, including a) actors who already intend to engage in environment sustainable and fair-trade practices, and b) actors whose interest has been raised through information and awareness campaigns as part of the project.</p> <p>(Private: EcoMassiwa, private individuals involved in clean beaches, Comoros Moringa, Massala D?lices, Maya Beaut? et cosm?tiques, network of hotels and restaurants)</p>			

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
Outputs to achieve Outcome 3	<p><b>Output 3.1</b> Nature-based value chains with real potential for consolidation or sustainable expansion based on a partnership between the private sector and local communities, responding to a strong local market demand, are assessed and selected to provide increased incomes for local community members and contribute directly to the protection of biodiversity</p> <p><b>Output 3.2:</b> Strengthened capacities of local community members to provide goods and services that meet the needs and standards required for integration into sustainable PA-related value chains, by taking an entrepreneurial approach</p> <p><b>Output 3.3</b> Mutually beneficial partnerships between local producers / gatherers / fishermen cooperatives (men and women) and private sector actors are developed with the support of the Mayors and the PA Agency to support the growth of the selected value chains and develop equitable partnership agreements (based on the feasibility studies carried out) that contribute directly to the reduction of threats to ecosystems within PAs</p> <p><b>Output 3.4</b> Strengthened business capacities of private enterprises whose operations are linked to PAs, to ensure sustainable expansion of value chains that have a high potential to provide increased incomes for local community members and contribute directly to biodiversity protection</p> <p><b>Output 3.5</b> Development of a marketing strategy ?for all products developed in relation to PAs ?focused on biodiversity protection, fair trade, and a branding in relation to PAs</p> <p><b>Output 3.6</b> Support for the start-up of value chains</p>			
<b>Component 4.</b>	<b>Knowledge management, M&amp;E, and gender and people with disabilities (PWD) equity</b>			
<b>Outcome 4</b> Effective knowledge sharing supports learning across project stakeholders, Comoros and regional SIDS	<i>Indicator 12:</i> Number of village communities within national parks where members seek project support or apply knowledge and solutions shared through the project, outside targeted intervention sites or pilot sites (total of 74 villages in PAs)	0	10	20
Outputs to achieve Outcome 4	<p><b>Output 4.1</b> Technical knowledge and lessons learned from project experiences are compiled and evaluated to increase the effectiveness of project implementation and translated into knowledge products and disseminated within project sites, across Comoros, and among regional SIDS to strengthen the capacities of all biodiversity conservation stakeholders</p> <p><b>Output 4.2</b> National ownership and pride in the Comoros PAs through increased public perception of the richness and uniqueness of the biodiversity and landscapes and the value of the ecosystem services they provide</p>			

	Objective and outcome indicators	Baseline	Mid-term target	End of project target
<p><b>Outcome 5</b> Increased opportunities for women and PWD to benefit from ecosystem goods and services in PAs and to integrate nature-based value chains linked to PAs</p>	<p><i>Indicator 13:</i> Representation (%) of women in the co-governance system of national parks participating in decision-making processes relating to management planning and development of park land and coastal marine areas and resource uses: - PA management staff - National Agency for PA Management members (60-member association) - National Parks Co-management committees - Village co-management committees</p>	<p>PA management staff: 27% (17% of <i>Conservateurs</i>, 25% of community mobilizers and 28% of ecogards) National Agency for PA Management: 23 % National Parks Co-management committees: 50% Village co-management committees: 50%</p>	n.a.	<p>PA management staff: 35% National Agency for PA Management: 35% National Parks Co-management committees: 50% Village co-management committees: 50%</p>
Output to achieve Outcome 5	<b>Output 5.1</b> Gender and PWD action plans are implemented, monitored and evaluated			

[1] These areas do not include dry forests and will be adjusted during the 1st year of the project on the basis of inventories to be carried out.

**ANNEX B: RESPONSES TO PROJECT REVIEWS (from GEF Secretariat and GEF Agencies, and Responses to Comments from Council at work program inclusion and the Convention Secretariat and STAP at PIF).**

STAP Review Project ID 10351 ? Technical screening of the Project concept ? December 6, 2019		
STAP Overall Assessment	Responses to comments provided at PIF stage	Responses to comments provided at CEO ER stage

Minor issues to be considered during project design: STAP welcomes the project entitled "Biodiversity protection through the effective management of the national network of protected areas" in Comoros submitted by UNDP. STAP feels that overall this is a strong project with a clearly defined objective with four fairly well developed components with a high likelihood of success. One area that could be improved is Component 3 with its focus on Community Based Natural Resource Management (CBNRM). STAP fully supports this work; however, the *PIF lacks information on the specific mechanisms of how community rights to manage land and resources would be strengthened*. STAP recommends that project proponents refer to STAP's recent document entitled "Local Commons for Global Benefits" and refer to recommendations in Section 4 for additional guidance.

1. Thank you for this comment. This issue has been addressed through various interventions to secure community rights over lands and resources and to strengthen their capacities to ensure their sustainable management:

- Helping strengthen community land and resource tenure:

The Project will contribute to clarify the issue of land tenure, particularly to ascertain the extent of community land ownership, or village terroirs, within the National Parks through output 1.2 on the development of master plans for terrestrial and marine/coastal areas within protected areas, and more specifically sub-outputs 1.2.1 on the participatory delineation and mapping of village terroirs within protected areas, the translation of the georeferenced coordinates of the PA boundaries and of zoning into local communities' own reference system, the ?lieux-dits?, and 1.2.3 on the participatory planning of land/coastal and resource use, including the delineation of areas reserved for the harvesting of natural resources by local communities involved in value chains ? both planning processes will be supported by village co-management committees; these plans will be developed in parallel with strategic environmental and social assessments to ensure, inter alia, they do not restrict other people's legitimate access rights. In this way, National Park management plans will incorporate land tenure issues in the review of park management plans and all community engagement activities, in order to capture accurately tenure and community engagement in National Park management. The project will document the boundaries of the different zones as well as the conflict zones. Any physical

Part I: Project Information		
B. Indicative Project Description Summary		

Outcomes

Do the planned outcomes encompass important global environmental benefits/adaptation benefits?

If these outcomes are successful and the PAs are effectively managed and people are able to generate income in a way that takes pressure off of the natural environment, then there should be significant benefits to biodiversity. However, a critical question is the extent to which the project will succeed in creating "alternative livelihoods" which theoretically should reduce unsustainable and destructive farming practices. However, even if successful, very little is known about what impacts (if any) alternative livelihood projects have had on biodiversity conservation, as well as what determines the relative success or failure of these interventions (Roe et al., (2015). "Are alternative livelihood projects effective at reducing local threats to specified elements of biodiversity and/or improving or maintaining the conservation status of those elements?" Environmental Evidence 4:22. DOI 10.1186/s13750-015-0048-1. This component is mainly about working with communities to collect data and strengthen community engagement through CBNRM; however, more detail should be given about how specifically this will take place and how the livelihoods will be chosen (e.g. economic assessment to determine demand for whatever will be produced).

2. Thank you for this comment. Indeed, this paper by Roe *et al.* 2015 reviewing the impacts of alternative livelihood projects at reducing local threats to biodiversity found that projects had reported positive, neutral and negative conservation outcomes, and a major issue was that the outcomes of most projects had not been adequately reported in a way that they could be captured in a large survey. Under Component 4, the project will document the implementation and outcomes of interventions and identify lessons learned for all issues, including socioeconomic and conservation outcomes. The indicators in the Project Results Framework include the assessment of sand extraction from beaches in the marine protected areas and the coverage of forest and mangrove ecosystems which may, at least partially, reflect the evolution of important human-related pressures. Component 3 has been slightly reoriented to respond to STAP and other reviewers concerns and to recommendations expressed in targeted workshops with focus groups early in the project preparation process, but above all to ensure that tangible benefits are enjoyed by local communities and provide adequate incentives to give up activities that are detrimental to species and ecosystems. The project also takes into account the recommendations of 6 community workshops that took place as part of the GEF ID 10351 project to assess the impacts of IGAs developed by environmental projects over the past 23 years in the Comoros. These workshops brought together 120 beneficiaries of IGAs and private sector representatives. Beyond the fact that more than 75% of funded IGAs no longer exist, findings include that the limited number of



	Are the global environmental benefits/adaptation benefits likely to be generated?	As above.	3. The rationale is provided in the response to the previous comment (please see response #2)
Part II: Project justification 1. Project description. Briefly describe: 1) the global environmental and/or adaptation problems, root causes and barriers that need to be addressed (systems description)	Is the problem statement well-defined?	The problem statement is not specifically and precisely defined; however, it is clear after reading the section on threats what the major issues are in relation to loss of biodiversity.	4. The problem statement is defined under section II ? Development challenge of the GEF-UNDP Project Document. A thorough analysis of threats, actors, root causes and impacts was conducted as part of the PPG process and provided in the GEF-UNDP Project Document Annex 18.
3) the proposed alternative scenario with a brief description of expected	What is the theory of change? What is the sequence of events (required or expected) that will lead to the desired outcomes?	No explicit theory of change is presented. The project appears to apply a nested approach whereby capacity is first strengthened at the national level to improve coordination and planning,	5. The project <u>theory of change</u> (presented in Section II ? Development Challenge of the GEF-UNDP Project Document) is based on the premise that increased ownership of the PA network

outcomes and components of the project

What is the set of linked activities, outputs, and outcomes to address the project's objectives?

followed by site specific capacity to improve management in a way that integrates local communities into the decision making process and also seeks to find new income generating activities to relieve pressure on the landscape.

by all concerned actors based on a better understanding and more tangible perception of the local, national and global benefits provided by the PA ecosystems, both in terms of biodiversity and socio-economics gains, will lead to stronger political and financial commitment to support the PA system. The negotiation and establishment of mutually beneficial partnerships with government and scientific institutions and actors in the civil society, namely NGOs involved in environmental issues, will mobilize a whole network of experts to support the National Parks Agency and thus improve the relevance of the design of management plans for PAs and their resources and effectiveness and efficiency of their implementation through joint and concerted efforts, which will contribute to conserve the unique natural heritage of the Comoros. It is essential that the conservation and sustainable use schemes within PAs generate sufficient benefits at all levels, so that local communities perceive tangible interests resulting from the adoption of improved and sustainable practices, and so that the communal, regional and national authorities are motivated to provide the necessary political support and resource allocation for the implementation of management plans, as well as the technical staff to supervise and support local actors in the adoption of sustainable resource use plans as part of the nature-based value chains. Yet, this scheme could be compromised by the lack of financial resources to support the operations of the PA Agency and implementation of PA management plans, and ineffective legislative framework to protect PAs and their biodiversity. The mobilization of financial

	<p>Are the mechanisms of change plausible, and is there a well-informed identification of the underlying assumptions?</p>	<p>The project proponents seem to have a good understanding of the underlying assumptions; however, it is not entirely clear that the proposed interventions will necessarily lead to the change envisioned in this project as there are still many unknowns, such as questions regarding 'greening the value chain' as studies have been conducted but with no clear direction on implementation, financing, etc.</p>	<p>How interventions will lead to the changes envisioned is presented in the Theory of Change. The likelihood of this project having positive conservation outcomes is discussed in a previous comment (please see response #2).</p>
	<p>Is there a recognition of what adaptations may be required during project implementation to respond to changing conditions in pursuit of the targeted outcomes?</p>	<p>Not explicitly discussed.</p>	<p>6. The project implementation will follow an adaptive management approach through annual monitoring and assessment of the project progress towards expected outcomes and targets. This process will be conducted in each PA and involve beneficiaries and other stakeholders. Changing conditions that are expected to have a low impact will be addressed as part of this annual process and adaptation solutions integrated in the annual programming of activities, which will be approved by the project steering committee according to normal procedures. However, changing conditions that could have a high impact will be brought to the attention of the Steering Committee by the National Project Coordinator, to decide on the actions to be taken and communicate them to all on-site intervention teams within PAs.</p>

<p>6) global environmental benefits (GEF trust fund) and/or adaptation benefits (LDCF/SCCF)</p>	<p>Are the global environmental benefits explicitly defined?</p>	<p>They are defined in terms of hectares under improved management as per Indicator 1.2 and 2.2 with the underlying assumption that improved management effectiveness will lead to a reduction in the rate of biodiversity loss for these areas.</p>	<p>7. Global environmental benefits are described under Section III -Strategy of the GEF-UNDP Project Document and include:</p> <ul style="list-style-type: none"> <li>- improved management effectiveness of terrestrial protected areas over 61,815 ha and improved management effectiveness of coastal/marine protected areas over 54,762 ha which will lead to a reduction of the threats to endemic biodiversity in these areas and contribute to avoid GHG emissions;</li> <li>- restoration of terrestrial habitats over 6,871 ha which will contribute to restore habitats for biodiversity and contribute to avoid GHG emissions;</li> <li>- mitigation of 4,768,755 metric tons of CO<sub>2e</sub> greenhouse gas emissions due to reduced deforestation and restoration of forest areas within PAs.</li> </ul>
	<p>Are indicators, or methodologies, provided to demonstrate how the global environmental benefits will be measured and monitored during project implementation?</p>	<p>Component 4 relates to monitoring and evaluation; however, does not discuss how GEBs will be measured and monitored throughout.</p>	<p>8. Full details of the indicator measurement methods are given in the monitoring plan in Annex 4 of the GEF-UNDP Project Document.</p>

What activities will be implemented to increase the project's resilience to climate change?

Only that ecotourism will incorporate reef conservation into business model to mitigate against the effects of climate change (weak).

9. Climate change is a risk for the already vulnerable Comoros islands and could impact the protected areas with anticipated changes in rainfall patterns and overall reduction in rain volume, sea level rise and related coastal erosion, increased intensity of cyclones, increased risk of landslides and of soil erosion which will place an additional burden on the already stressed natural environment and put communities at risk. Sea level rise is already impacting coastal areas where local communities are co-managing marine National Parks. Similarly, the effects of climate change could further degrade terrestrial and coastal areas and put key ecosystems, biodiversity, and local communities' livelihoods at risk, thus challenging project activities and compromising the achievement of the project objective in terrestrial and coastal/marine protected areas.

Project interventions that will contribute to reduce climate risks to ecosystems and to local communities livelihoods include:

- Project activities to strengthen management skills of key stakeholders responsible for conservation in National Parks and to ensure active engagement of local communities and several institutional partners to enhance conservation and sustainable use of biodiversity in PAs.

- Planning for an optimal land and resource use within PAs (Output 1.2) will take into account areas vulnerable to the risks of erosion, flooding and landslides and ensure that no infrastructure or housing is built there. These plans will identify priority areas for the restoration of natural forests, which will improve the consistency and effectiveness of future interventions by different development

<p>7) innovative, sustainability and potential for scaling-up</p>	<p>Is the project innovative, for example, in its design, method of financing, technology, business model, policy, monitoring and evaluation, or learning?</p>	<p>No</p>	<p>10. As described under the section IV of the Project Document, and more precisely under <u>Innovativeness, Sustainability and Potential for Scaling Up</u>, the project adopts innovative approaches in the Comorian context for the following aspects:</p> <ul style="list-style-type: none"> <li>i) establishing business partnerships between local community cooperatives and the private sector to develop or expand nature-based value chains that have a potential to provide sustainable livelihoods to local communities,</li> <li>ii) developing a national certification system for products developed through value chains that are sustainable, equitable and related to the national protected areas,</li> <li>iii) assessing blue and green carbon stocks in the protected areas ecosystems, which is still new in Comoros and has yet to be integrated into systems to access carbon markets,</li> <li>iv) the systematic use of drones for long-term ecological monitoring of ecosystems and biodiversity is new in the Comoros and greatly increases the potential and scope of research to support the development of protected areas, and</li> <li>v) the different resource mobilization approaches that will be explored in the project represent potential for innovation at the national level, e.g. payments for ecosystem services, blue and green carbon finance, and green taxes.</li> </ul>
---	--	-----------	---

Is there a clearly-articulated vision of how the innovation will be scaled-up, for example, over time, across geographies, among institutional actors?

Corridors could be created between PAs to other protected reserves under co-management arrangements.

11. No corridor has been clearly identified nor created and there is no substantial rationale yet for creating inter-island ecological corridors or regional corridors in the SouthWest Indian Ocean. Identifying and mapping areas important for connectivity is an inherently complex process, especially when added to the already complex task of conducting a gap assessment. Planners must first answer the question of connectivity of what, to what and for what, and the answers may be clear only in areas with high degrees of fragmentation and conversion. Protected area planners may want to avoid the easy but potentially erroneous solution of simply identifying contiguous patterns of land cover when incorporating connectivity into gap assessments, and instead create summative maps that combine the connectivity needs for multiple species and ecosystems, to find the most efficient and effective scenario?.

As described under the section IV of the Project Document, and more precisely under Innovativeness, Sustainability and Potential for Scaling Up, Potential for scaling up, the project includes the elements needed for scaling-up its outputs and outcomes, first across the national parks and within the country, and potentially in other countries with similar issues and context. Replication elements include i) developing participatory land- and coastal use plans that will provide commonly agreed frameworks to coordinate the conservation and restoration interventions of all current and potential partners within the national protected areas (output 1.2), protocols for the monitoring of biodiversity that enable of communities and other stakeholders to

	<p>Will incremental adaptation be required, or more fundamental transformational change to achieve long term sustainability?</p>	<p>Incremental adaptation will be required once it is determine which products could be included in a 'green value chain' and which 'alternative livelihoods,' etc.</p>	<p>12. Project interventions to adapt to climate change impacts are described in the response to a previous question : What activities will be implemented to increase the project's resilience to climate change? While most interventions may be viewed as incremental adaptation, or extension of actions and behaviours that already exist, the project proposes an approach to move away from the mentality of rural populations who believe that nature has always fed them and will always feed them and that the failure of nature to meet their needs is a divine inevitability. This approach, which has been successfully implemented in pilot sites, involves helping resource users take responsibility for specific resources in an area where they traditionally use them, building their capacities to implement sustainable management measures, and to ensure they reap the benefits of this improved management, thus putting in place conditions that will gradually enable moving away from an open access regime that too often leads to an uncontrolled and unsustainable use of natural resources. This approach will be supported not only for the resources used in the value chains supported as part of component 3, but to all resource uses in PAs.</p>
<p>1b. Project Map and Coordinates. Please provide geo-referenced information and map where the project interventions will take place.</p>		<p>General latitude and longitude is given for the Comoros Islands and maps of the parks are included in Annex A. In the future, it would be ideal if the GEF portal included an interactive map whereby these PAs could be explicitly outlined or where shapefiles could be uploaded, etc.</p>	<p>13. Unfortunately, such maps were not available.</p>



<p>2. Stakeholders. Select the stakeholders that have participated in consultations during the project identification phase: Indigenous people and local communities; Civil society organizations; Private sector entities. If none of the above, please explain why. In addition, provide indicative information on how stakeholders, including civil society and indigenous peoples, will be engaged in the project preparation, and their respective roles and means of engagement.</p>	<p>Have all the key relevant stakeholders been identified to cover the complexity of the problem, and project implementation barriers?</p>	<p>Many stakeholders have been included. The <b><i>one glaring omission that could prove to be fatal for the project is the fact that the private sector in the Comoros operating in the agricultural, fishing and tourism sectors have not engaged</i></b> (p. 46).</p>	<p>14. The stakeholder analysis conducted as part of the project preparation includes the private sector operating in the PAs. A summary of the stakeholder analysis is included in the Stakeholder Engagement Plan provided under Part II: Project Justification of the CEO Endorsement Request and a full stakeholder analysis is presented in the GEF-UNDP Project Document Annex 9. The private sector was involved in the preparation of the project through focus group meetings (before the COVID) and through individual contacts to discuss their potential involvement in the project.</p>
<p>5. Risks. Indicate risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved, and,</p>	<p>For climate risk, and climate resilience measures: How will the project's objectives or outputs be affected by climate risks over the period 2020 to 2050, and have the impact of these risks been addressed adequately?</p>	<p>The PIF cites specific impacts of climate change on the Comoros including temperature increases and sea level rise. Many effects are already being felt including coral bleaching and coastal erosion. <b><i>The project - while not focusing on climate adaptation - could minimize some of these effects through reduced pressure on coastal areas, for example.</i></b></p>	<p>15. The answer to this question is provided for a previous comment (please see response # 9).</p>

<p>if possible, propose measures that address these risks to be further developed during the project design</p>	<p>? Has the <i>sensitivity to climate change, and its impacts, been assessed?</i></p>	<p>No</p>	<p>16. An assessment of climate risks is presented in the Annex 13 of the UNDP-GEF Project Document.</p>
<p>6. Coordination. Outline the coordination with other relevant GEF-financed and other related initiatives</p>	<p>Have specific lessons learned from previous projects been cited?</p>	<p>Yes - in fact the project specifically discusses lessons learned from a GEF-UNDP project (ID 4950) MTR that will be reviewed during PPG phase of this proposed project.</p>	<p>17. This project builds on and aims to consolidate the foundations of the PA System put in place by the GEF-UNDP project (PIMS 4950). A thorough assessment of the project's achievements and remaining gaps in terms of enabling framework at the systemic and institutional levels, and capacities to co-manage PAs and their resources has been conducted early in the preparation process. Several annexes of the UNDP-GEF Project Document identify the gaps to be addressed under this project: METT for each PA in Annex 14, Capacity Development Scorecards in Annex 16, Financial Scorecard for the PA System in Annex 17, Analysis of threats to biodiversity in Annex 18, and Gaps in the legislative Framework in Annex 21.</p>
	<p>How have these lessons informed the project's formulation?</p>		

8. Knowledge management. Outline the Knowledge Management Approach? for the project, and how it will contribute to the project's overall impact, including plans to learn from relevant projects, initiatives and evaluations.

What overall approach will be taken, and what knowledge management indicators and metrics will be used?

KM focuses on 1) gender empowerment strategy; 2) increased public awareness; 3) environmental education; 4) lessons learned and exchanges across PA sites; and participatory M&E. Indicators are number of brochures, posters, schools incorporating lessons learned, etc. ***This could be improved substantially.***

18. KM has been separated from Gender Empowerment at the level of outcomes in order to highlight the specific effects expected for each of the issues, although the Gender Empowerment also involves knowledge management:

Outcome 4: Effective knowledge sharing supports learning among project stakeholders and in the Comoros and regional small developing island states (SIDS)

Outcome 5: Increased opportunities for women and people with disabilities (PWD) to benefit from ecosystem goods and services in the protected areas (PAs) and to integrate nature-based value chains that are linked to the PAs.

The expected outputs to achieve Outcome 4 include:

Output 4.1 Technical knowledge and lessons learned from project experiences are compiled and evaluated to increase the effectiveness of project implementation and translated into knowledge products and disseminated within project sites, across Comoros, and among regional SIDS to strengthen the capacities of all biodiversity conservation stakeholders ? which involves participatory M&E and learning to enable adaptive project management, compilation and dissemination of knowledge products, lessons and good practices identified under the project, and support for experience sharing among National Protected Areas Agency staff and within PA co-management village committees.

Output 4.2 National ownership and pride in Comoros PAs through increased public perception of the richness and uniqueness of the biodiversity and landscapes and the value of the ecosystem services they

	What plans are proposed for sharing, disseminating and scaling up results, lessons and experience?	As above.	19. Plans for sharing, disseminating and scaling up project's results and lessons are described under outputs 4.1, 4.2 and 5.1 under component 4 of the GEF-UNDP Project Document, Section IV Results and Partnerships.
--	--	-----------	---

<b>GEF Secretariat Comments to GEF ID 10351 - 31 October 2019</b>		
<b>GEF Secretariat Comment</b>	<b>UNDP/DGEF Response at PIF stage</b>	<b>Additional response at CEO ER stage</b>
Please note in the paragraph after Table F that these are programming lines, not different focal areas. The line on "Further develop biodiversity policy and institutional frameworks" is meant for work related to the Cartagena and Nagoya Protocols and NBSAPs and, therefore, does not apply here.	Thank you. Have deleted the Reference to "III. Develop Biodiversity policy" on page 6.	No additional comment.

<p>We understand that there is an existing project on PAs with UNDP that is currently coming to a close. We think it would be important to include how the results of the TE will be incorporated into project design during the PPG.</p>	<p>Project GEF ID 10351 will close out in April 2021 ? accordingly a TE will not be available during PPG. However, the PIF has incorporated recommendations from the Mid Term Review of Project ID 4950 and notes that this GEF7 project builds on the successes and gaps identified. As the ProDoc is developed during PPG, the recommendations will be further developed into specific activities that will, <i>inter alia</i>, enhance the effective involvement of communities in the co-management process (Recommendation #1), focus on securing additional funding to capitalize the FEC (Recommendation #2), seek to involve other projects in PA management activities (Recommendation #6), and actively work to strengthen environment and PA-related laws and their enforcement (Recommendation #9). The 4 Components outlined in the GEF7 project will be developed further into the ProDoc and CEO ER during PPG and a note has been added to the PIF regarding the need to incorporate the Recommendations from the Mid Term Review (page 12 in the PIF).</p>	<p>20. The context of the pandemic has disrupted the implementation and schedule of the project and, at the time of submitting this request, the final evaluation has not yet taken place. It is scheduled for September 2021 and operational closure in December 2021. The development of the project incorporated the recommendations of the mid-term review and the lessons learned during the implementation:  R1: enhance the effective involvement of communities in the co-management process (Output 1.1, sub-output 1.1.4);  R2: focus on securing additional funding to capitalize the FEC (Output 1.3);  R6: seek to involve other projects in PA management activities (institutional partnerships with the National Parks Agency ? Output 1.4, and partnerships with other projects described in ProDoc, Section IV Results and Partnerships);  R9: actively work to strengthen environment and PA-related laws and their enforcement (Output 1.1, sub-output 1.1.1)</p>
<p><b>Component 1</b></p>		

Some of the threats mentioned such as road development and fisheries concessions are quite significant and are being pushed by other ministries. Dialogue is a good tool, but may not be sufficient in changing the perspectives of infrastructure and development focused ministries. How will the activities of the project seek to address these issues?

i. The mention of 'fisheries concessions' has been removed from the PIF on page 13, particularly as these do not affect the PAs targeted by the Project. Fisheries activities at project sites are more 'artisanal' and do not present the same degree of threat (destructive fishing practices are noted in the PIF as being localised threats).

ii. The project will focus on activities that will strengthen the new legal framework for Protected Areas in Comoros. The new PA Law was recently submitted to the Union Assembly to the Office of the President of the Republic and its promulgation will be the next step in the process to adopt legislation and text for application of the Law.

Activities are currently underway with the communities and the Government of Comoros through Project GEF ID 10351 and include assisting with preparations for the enforcement of the new law, including the specific requirement under the Law that environmental impact studies should be carried out for any infrastructure development (such as roads) within the PA areas. An environmental impact study has been carried out regarding the road construction that links the villages of Dindri and Lingoni and passes through the Mont Ntringui Park and mitigation measures have been proposed, including a) planting *Pterocarpus indicus* along the entire road to reduce erosion risk and restore those trees that were destroyed when the road was built. These activities will be carried out by the Staff of Shissiwani and Mont Ntringui NPs, Anjouan Police and villagers neighbouring the NP. The Mont Ntringui NP team is monitoring the replanted trees on a monthly basis (and sending reports to Anjouan environmental agency) and is limiting access to Lake Dzilandz? by farmers who are using the road to access the lake more easily. These activities are likely to continue through the PPG and into the project itself.

Text to this effect has been added on pp 13 in the PIF, as follows:

Additionally, there is concern amongst key community stakeholders that cross-sectoral ministerial engagement on issues that affect PA management and integrity are unclear, for example with regard to plans at the Ministry of Transport to develop the road infrastructure on the islands; the Project will address this through ensuring strategic inter-ministerial dialogue happens from the outset, as well as ensuring that the obligatory Environmental Impact Studies (required under the new PA Law) for any new infrastructure development (such as roads) within the PAs are carried out.

21. Law N° 18-005/AU of December 05, 2018 on the national system of protected areas of the Comoros was adopted and promulgated by presidential decree N° 19-129/PR of November 29, 2019. As part of Output 1.1 related to strengthening capacity of the NP Agency, DGEF, and co-management committees to implement and enforce laws, regulations, and management systems related to the PA network, the project will support the elaboration of missing texts to strengthen the application of this law, and to guide and support the process of environmental impact assessments (EIA) provided for in the framework law on the environment, including a public inquiry procedure. These texts will be addressing gaps in the legal framework for protected areas and biodiversity conservation identified in a gap analysis presented in the Annex 21 of the GEF-UNDP Project Document.

The Protected Areas Management Agency was created on June 20, 2021 and is responsible for managing protected areas in accordance with the Law on the PA System including, among other things, recommending to the Minister in charge of PAs modifications to existing PAs (on its own initiative or that

1.1.1 - The GEF is not the financial mechanism for CITES and trade is not listed as a threat in the introduction. We understand that this is part of a larger effort, but can you please provide a few sentences on the focus of this work?

Looking at CITES legislation within the Comoros will ensure that all biodiversity trade related policies are reviewed and incorporated into project activities. Ensuring that CITES listings of key biodiversity is taken into account when developing biodiversity-friendly value chains (which could include sustainable use of CITES-listed species ? species to be identified during PPG but could include reptiles and amphibians and various flora species). Consultations with CITES Secretariat indicate that efforts may be made with Comoros during the project lifetime to link with project activities on ensuring coherent legislative framework for protection of biodiversity within the PA system. Knowing the species that can or cannot be traded under CITES is important also for any biodiversity-based value chains that may be developed (which will be researched in greater detail during PPG). Stakeholder consultations noted that it is important to ensure that all value chain options were considered and that market options were left open such that the best ?deal? for nature and for people could be achieved through the project (Component 3). As noted in the PIF: The Comoros became a party to CITES in February 1995 and is currently included in Category 3 under the CITES National Legislation Project. The CITES Secretariat?s latest update indicates that the Comoros is in the process of drafting revised legislation, but this is not yet finalised. As a longstanding Party with national implementing legislation still in Category 3, the country risks increased scrutiny and pressure to ensure that CITES-appropriate national legislation is in place, which could jeopardise any potential income-generating activities based on the sustainable use of CITES-listed species. Additional text has been added to the PIF to clarify this issue as Footnote 2 on page 1 as follows:  
The Comoros is included in Category 3 under the CITES National Legislation Project and potentially subject to increased scrutiny and pressure to ensure compliance with ratification of the Convention, with potential consequences on value chains that could be developed based on CITES-listed species (Component 3). National CITES legislation and associated implementation mechanisms could also be key supplementary tools for the conservation of CITES-listed species that exist in the target PAs and assist with decision-making on zoning for enhanced biodiversity protection (Component 2).

22. The University of the Comoros is responsible for the implementation of CITES legislation and is currently reviewing the status of the species concerned. Since this activity is already supported and given the importance of some urgent challenges to ensure the continuity of the protected areas system, which is the focus of this project, including the operationalization of a financing mechanism for the PA system and the development of alternative livelihoods to enable local communities to cease unsustainable uses of resources, it was decided to allocate project resources to activities that directly contribute to improving the co-management of protected areas and not to include this activity.

1.1.1 - Lack of effective enforcement of PA protections is listed as a major threat. It is unclear how this will actually be improved through the project activities.

Efforts have been made through Project GEF ID 10351 to operationalize the nascent PA system and support considerable collaboration with communities (awareness-raising and skills transfer). These efforts will be continued into and developed further during the GEF7 project, together with application of various lessons learned and recommendations from the MTR. The new PA Law and associated texts that govern the creation and management of the PAs, together with the newly created PA Agency, will be supported by the Project and the co-management approach (with communities) will constitute the lever for the PA protection.

Project activities will be developed during PPG taking into consideration the National Strategy for the Expansion of the PA Network (2017-2021), which was referenced and incorporated into the PIF. Actively protecting PAs is a fundamental and key strategic axis of the National PA Strategy, which notes that eco-guards, Rangers, Conservation Officers, as well as the PA Agency personnel, will take part in multiple training events in order to "master their rights and duties". The Strategy indicates that trained eco-guards will ultimately be sworn in as Judicial Police Officer (OPJ). The Strategy further plans to develop a confidential monitoring plan for improved enforcement and monitoring by patrol teams. Training and capacity building activities will address PA co-management needs, techniques and methods, and participants/recipients of the training will be targeted based on their responsibilities for public awareness and enforcement of the new Laws relating to PAs.

As noted in Footnote 1 (page 1) of the PIF, the Co-management Committees per National Park comprise representatives from various sectors affected by the NP, including: community representatives from the villages in the NP, Mayors from the Municipalities, representatives from the DGEF, Science Faculty, Gendarmerie, Police, Coast Guard, National Tourism Office, Chamber of Commerce.

23. In addition to comments provided at PIF stage:

As part of activities to achieve Output 2.2 - Management tools are drafted, approved and implemented in the PAs, and more specifically as part of activity 2.2.5 - Action plans to address deforestation and removal of beach material implemented, monitored and evaluated, the project will develop and implement actions plans to reduce two key pressures on terrestrial and marine ecosystems, i.e. deforestation and removal of beach sand, through awareness and strengthened surveillance. The following describes the project's contribution to strengthening surveillance and enforcement in protected areas:

According to the principle of collaborative management, surveillance is first and foremost a matter of self-regulation mechanisms within communities, in accordance with the rules set out in the co-management agreements that have been drawn up with their participation. In this regard, the main role of the Ecoguards will be to inform and recall the zoning of PAs and the rules that apply to them to members of local communities and to give warnings to offenders. The



Plastic pollution - Please note that the GEF does not support solid waste management activities as these are generally considered local environmental benefits. While coordination with the GEF ISLANDS programs is welcome, this project cannot support solid waste management. It can be supported through cofinancing. Certainly, the creation of biodiversity friendly businesses that make use of waste is welcome. However, it will be important to make sure that those businesses are not dependent on unsustainable practices in the first place that could/should be fixed in the shorter term and, therefore, make the business nonviable.

i. Plastic pollution ? the plastic pollution in Comoros is severe and is mentioned in the PIF in terms of potential ecotourism value chains, where any value chain analysis will highlight the high levels of pollution across the islands and avoid worsening the situation. It is not anticipated that any project funding will be allocated to solid waste management activities and this will be made very clear during ProDoc development. The project will work in coordination with other UNDP and Government projects that are addressing the issue.

ii. ISLANDS program - The project will not be addressing solid-waste management, but it is recognised that the project will have linkages to the activities that are planned under ISLANDS. The integrated management system that will be put in place will enable the development of waste recovery activities for the production of compost or plastic-based craft products. Coordination with the project will thus enable the development of income-generating activities for riverine communities and replicate the recovery mechanism that will be adopted in PAs.

iii. Small businesses based on ?waste?. Thank you for this important point ? we shall make sure that this is taken into consideration when developing the Initiation Plan and ToRs for the ?Livelihoods & Value Chain Specialist? to be contracted for development of the ProDoc during PPG. Also, this will be addressed in more detail under Component 3. It is worth noting that discussions were held with the Director of the Maison de l'Artisanat at the Ministry of Economy and she noted that small businesses using waste matter are already being developed with their support (such as car tyres recycled into plant holders and waste bins by the Municipality). A specific request was made by the Maison de l'Artisanat to consider the use of waste materials (including waste newspapers, cement/rice sacks). One of the main aims of working with the Maison de l'Artisanat is to revive the apparent lost skill in artisanal handicrafts.

24. Plastic pollution is not directly addressed in the project. However, one of the alternative livelihood options under Component 3 will support the replication of initiatives related to "clean" beaches that promote family weekend tourism, where young people provide access to clean beaches, rustic reception facilities and picnic facilities for family beach tourism for a small fee. Community-maintained beaches that are known to be clean are more popular on weekends. Community members who maintain the beaches have taken the initiative to offer meals, set up refreshment stands, and erect huts or rustic shelters with coconut wood to accommodate family tourism, which has become very popular, especially during times of pandemic. In order to reward village communities that adhere to the objectives of the PAs by maintaining the beaches, the project will provide training in sanitation, hygiene and catering to community members, especially youth and women, as an alternative option to fishing on foot on coral reefs, sand collection or other unsustainable livelihoods. One of the key aspects considered for the identification of livelihood activity options under component 3 has been



i. CEPF and Blue Ventures are not themselves CSOs that the project would be engaging as described and are not on the ground CSOs. Please clarify this.

i. Thank you ? it is correct that CEPF does not have a national office representative; the individual consulted during PIF preparation is in close contact with the UNDP Country Office, and is the national representative of the Tany Meva Foundation (based in Antananarivo, Madagascar), which provides funding for specific projects on the ground. Tany Meva Foundation issues a call for proposals in Comoros and final funding decisions are taken by Tany Meva in MG. Reference to CEPF has been removed from the PIF.

During PPG, the larger and more traditional conservation and development NGOs will be contacted and researched in more detail. The Comoros falls under the project portfolio of WWF-MG, which has selected the North Mozambique Channel and islands as a target site for project interventions; this includes the Comoros islands.

ii. Thank you for the clarification. Indeed, Blue Ventures (BV) collaborates with and works in the Comoros through its partner NGO, Dahari (since 2015). The aim of BV/Dahari is to conserve marine resources and improve local livelihoods through community-based fisheries management. Although BV provide support mainly to Dahari, they are currently exploring to expand that support to other local organisations, but are not planning to implement activities directly. BV also collaborates with governmental institutions in the Comoros, such as the Fisheries Directorate to harmonize approaches and create synergies as much as possible, especially in areas where projects overlap.

The PIF has been amended to reflect that Blue Ventures is not based in Comoros by deleting reference to BV (Footnote 7 on page 3 and text on page 13).

25. As part of Output 1.4, the project will support the negotiation and signature of long-term agreements between national and international institutions and the NP Agency, based on mutual benefits, to mobilize a network of experts to support the planning and implementation of PA development and management plans. Such agreements have already been signed between the Agency and Dahari (for the monitoring of Livingstone's fruit bat, sustainable natural resource management and livelihood support to local communities in the Ntringui NP), AIDE (for the monitoring of marine biodiversity and related training for Ecoguards) and Banda Bitsi (namely for mangrove and beach clean-up and ecotourism development). Other agreements that have been established for a single PA, could be revised, when deemed relevant by both parties, to cover all PAs, such as the agreement with the NGO Maeecha. Agreements will be developed or expanded with the following institutions and NGOs and actors, without necessarily being limited to them, the University of Comoros (UdC), National Centre for Scientific Documentation and Research (CNDRS), National Institute for Research in

<p>The METT doesn't exactly capture "conservation successes" nor number of people participating in co-management. Number of participants could be a good indicator, but it <u>would be better to some sort of threshold for quality of participation not just that they attended a workshop.</u></p>	<p>i. Thank you. The wording and description of the METT as an indicator and target for Component 2 has been amended on page 3 from:  <i>Number of people participating in new models of co-management (target being increased conservation successes as captured by METT)</i>  To: <u>number of people participating in new models of co-management (target being progress in improved management effectiveness at target PA sites, as measured by the scoring system in the METT).</u>  In addition, the baseline METT provided is the score given to the PAs in the Mid-Term Review of Project ID 4950 (as noted in Annex B to the PIF).</p> <p>ii. Training (eg on biodiversity and PA management, annual refresher courses, training-of-trainer sessions, etc) targets many different co-management actors, including the EcoGuards, Co-management Committees, Ministry personnel, as well as the communities (as 'eco-guards' and patrol scouts) and municipal police. Each community has a representative that has been nominated by the Village Communities (30-40 people per village) and these nominees are participating in the training events. They then share their knowledge learned with the rest of the village/community. Other actors include Local Civil Protection Units, the <i>Gendarmerie</i>, Students at the Faculty of Science, particularly those students following Masters in Biodiversity. <u>A footnote 6 has been added to the PIF on page 3 to clarify the 'quality' of participants.</u></p>	<p>26. The METT is used as an indicator of the terrestrial and marine/coastal areas over which protected area management effectiveness is improved. The METT has been applied in each protected area to provide a baseline for the new project as well as the end-of-project values for the GEF ID 10351 project. The formulation proposed ('number of people participating in new models of co-management with target being progress in improved management effectiveness at target PA sites, as measured by the scoring system in the METT) does not suit the project interventions.</p>
<p>2.1.2 and 2.13 - These read more as outcomes than outputs</p>	<p>Thank you. Outputs 2.1.2 and 2.1.3 have been amended and effectively combined into one single Output, which reads as follows:  2.1.2 <u>Management tools (including species management plans for key terrestrial and marine species) are drafted, approved and applied at target sites within the nascent PAs.</u>  The Footnote 8 associated with Output 2.1.2 has been amended (page 3) and now includes the text that was previously in Footnote 9. The original Footnote 9 has been deleted in the PIF (page 3).  Please also note that numbering for Output 2.1.4 has now been changed to Output 2.1.3 (highlighted on page 2 in the PIF).  Revised text has also been inserted in the Section 3. Alternative scenario, to reflect the changes made in Table B, Component 2, output 2.1.2. Amended text is highlighted on page 13 and reads as follows: <u>(ii) management tools (including species management plans for key terrestrial and marine species) are drafted, approved and applied at target sites within the nascent PAs; (iii)</u></p>	<p>No additional comment.</p>
<p><b>Component 3.</b></p>		

3.1.1 - It seems that such a study would also be very helpful at a national level in supporting the goals of this project. Will it have any relationship with the activities in component 1? It will be important to focus this work (that can be come expensive and overly technical) based on the needs of the community and the intended audiences.

Thank you ? yes, a nationwide study will be extremely valuable. To the extent possible ? will be further quantified/qualified during PPG ? such a study could cover a considerable landscape but the main purpose under Component 3 is to conduct an Ecosystem Services study to provide supplementary information to Value Chain studies to be conducted at the target sites. As the Reviewer notes, Ecosystem Service studies can be expensive. As noted in the PIF (page 14), during PIF preparation, a clear request was made to include activities that demonstrate the value of the ecosystem services provided by the PAs and communicate this to the stakeholder communities for enhanced and informed decision-making.

27. Given the high costs and technical complexity of such studies, the lack of national capacities to carry them out, given the fact that such studies were conducted for one ecosystem service, i.e. water, on one island (Mwali), by scientists of the University of Comoros with the support of scientists from Madagascar and that results are difficult to understand for non-scientists and unconvincing for the country's authorities and even less for local communities, given the importance of some urgent challenges to ensure the continuity of the protected areas system, which is the focus of this project, including the operationalization of a financing mechanism for the PA system and the development of alternative livelihoods to enable local communities to cease unsustainable uses of resources, it was decided to allocate project resources to activities that directly contribute to improving the co-management of protected areas and not to include this activity. The purpose of convincing local communities of the value of healthy ecosystems and biodiversity will be best served by developing sustainable livelihoods through nature-based value chains (Outcome 3), and the purpose of convincing

### 3.1.3

While we understand that "artisanal" may be a cognate of the ministry, the choice seems a bit odd as it sounds like this is focused on handicrafts. Is the point to create highly specialized industries and value chains (as is implied by this word choice in English)? If so, what sort of market research will be done to ensure that the products developed have a market and way to get to market? For things related to tourism, is there sufficient tourism of the right type to support such ventures? USAID has a helpful set of tools on conservation enterprises that would be good to apply to these activities. It will also be important to consider unintended consequences of product development and learn lessons from other projects around the world.

i. ?Artisanal? ? development of small enterprises but not limited just to artisanal efforts; this will be one of the various options that will be investigated.

As plastic bags have been banned in Comoros, there is a need for baskets/bags made from other materials (eg raffia/straw/recycled newspaper/etc) for all Comorians to use. There is a strong national market demand that needs to be researched and quantified and this will take place during PPG. The skills for ?artisanal? production is very limited in Comoros and most products are imported from eg Madagascar (for products made from raffia) and Dubai (for products that are purchased in quantity for the ?*Grand Mariages*?).

ii. Market research ? as noted in the PIF (page 14), a value chain specialist will be contracted to research not only the natural resources that can be developed into micro-enterprises, but also research the entire value chain from source to shelf, ie including markets, both real and emerging/potential.

iii. Tourism - tourism is currently limited in Comoros, but the Government?s Tourism Strategy demonstrates the will of the Government to rectify this and encourage tourists to the islands. This will involve efforts to strengthen the country?s competitive advantage within the sector and position the islands as a destination of choice for tourists. These are clear challenges for the Government, but a confirmed priority.

iv. Tourism and USAID toolkit - thank you, the toolkit will be useful to research and reference during PPG. A high quality ecotourism value chain expert has already been identified to assist with this aspect during PPG. The GuC has a Tourism Strategy ? as noted in iii. above and on page 14 of the PIF ? and the project will liaise with GuC on this aspect of the Component 3 during project implementation. Further details will be provided during PPG.

iv. Unintended consequences and lessons learned ? thank you. This will be included in ProDoc development during PPG.

28. In addition to comments provided:

Under component 3, the project will support the incipient private sector for securing the development or expansion of sustainable nature-based value chains and promote fair and equitable sharing of the benefits as incentives for local communities in the national parks to adopt sustainable resource use practices and foster their appropriation of protected areas and compliance with regulations. The development of new or expanded more inclusive and equitable value chains will involve feasibility studies to assess the potential for consolidation or sustainable expansion, trainings, market incentives, facilitation of access to finance and close support to actors in the value chains.

The strategy to identify value chain options focuses on i) natural products from PAs, ii) for which there is a strong demand in the local market, iii) to which private sector actors are already committed and interested in engaging with local PA communities to expand the value chain, and iv) meeting the needs of a local clientele or whose recurring return to the Comoros is foreseeable (the diaspora). This strategy was designed, among

<p>3.1.3 "Enhance the value of natural forest.." is also somewhat confusing. What is meant by this? How do we ensure that this does not lead to further forest degradation when certain products become more valuable?</p>	<p>The project is addressing forest protection through Component 2. The community representatives who will be co-managers of the "natural forest" will be members of the same villages and communities where value chains will be developed, some of which could be based on natural resources occurring in a "natural" ie protected forest. Ecotourism ventures are a potential value chain that would rely on an intact or high-value natural forest that would include management plans stipulating the requirement for reduced, even halted, forest degradation. Management plans being developed under Components 2 and 3 would also include requirements for sustainable offtake, as well as ensure that monitoring and traceability of any use is indeed legal, sustainable and verifiable. It is not clear at PIF stage what these markets could be and an expert Natural Resource value chain specialist will be hired during PPG to perform an in-depth analysis with recommendations and necessary precautionary advice.</p>	<p>29. In addition to comments provided: The project will support the development or expansion of sustainable and fair value chains based on ecosystem services or products from PAs. In order to avoid that such value added is detrimental to natural ecosystems, the project will first assess the capacity of resources and ecosystems to withstand a certain use level and build local capacity to manage natural resources, as described in comment #1.</p>
--	---	---

<p>3.1.5 - It's unclear whether the measure of "number of training events..." is an appropriate or effective indicator to get at what the project is trying to do. It seems that the project would do better as a match maker and support the development of new and nascent private sector rather than setting up a dichotomy between community and private sector. Some Text - The reference to watershed management and CCM is quite unclear and how it relates to this work</p>	<p>i. The indicator that notes <i>number of training events on financial accounting and negotiations with private sector and investors</i> has been changed to reflect the need for targeted training materials on financial accounting and negotiation skills. Indicator now reads: <u>training materials produced that focus on financial accounting and negotiation skills</u>. Please see page 4.</p> <p>ii. Dichotomy between community and private sector ? we have mentioned in the PIF that the community, fishers and some people in associations can be considered as ?private sector? also (Section 4. Private sector engagement, page 20 in the PIF). We have noted that the enterprises set up may involve cultivation of vegetables and food-stuffs that are needed on the national market and that this would effectively ?create? a new private sector within communities, as well as establish linkages with potential ?new? private sector in-country and in the region (inter-island trade, as well as trade among the Western Indian Ocean Islands)</p> <p>iii. Watershed management and CCM ? as noted in the PIF, watershed management underpins activities described under Component 3 where the islands promote climate change mitigation; accordingly, the Project will work in tandem with other projects being undertaken on watershed management (UNEP-GEF project with MEAF) and CCM (UNDP GCF project) being carried that address these issues. Text updated on page 14 of PIF.</p> <p>This output is key to enable communities to make co-management decisions, as the connection between conservation of ecosystem services and values of biodiversity has not been adequately addressed, although the linkages between deforestation and water supply and land degradation are recognised.</p>	<p>30. As previously mentioned in comment 28, this is the exact approach adopted by the project and requested by the actors of the private sector: Under component 3, the project will support the incipient private sector for securing the development or expansion of sustainable nature-based value chains and promote fair and equitable sharing of the benefits as incentives for local communities in the national parks to adopt sustainable resource use practices and foster their appropriation of protected areas and compliance with regulations.</p>
<p><b>Co-financing Table</b></p> <p>No, the financing from AFD and WB is surprising to see listed as in-kind and recurrent expenditure. Can you please clarify this? From the WB, it should probably be listed as a loan as well.</p>	<p>i. AFD co-financing amended to ?Grant? ? as noted in Footnote 46, the AFD has committed a total of Euros 6 million to MNP conservation activities, as well as Euros 1.5 million to the FEC. Table C updated.</p> <p>ii. WB co-financing will be negotiated in further detail during PPG but it is anticipated that there will be linkages through WB projects addressing ecotourism, access to markets, and fisheries. It is highly likely that the co-financing from WB will be part ?Grant? and part ?In Kind? and the table has been amended accordingly (Page 5). All co-financing will be confirmed during PPG.</p>	<p>31. The co-financing from AFD pledged as a founding contribution to the FEC has been withdrawn and no other commitment could be secured despite repeated meetings. Other cofinancing has been confirmed for a total amount of \$25,854,156.</p>



**Core**

**Indicators**

No. It would be good to have clarity on the fact that these people all live within the PAs. If not, then there should be numbers included in the mainstreaming indicators.

At PPG, it would be good to include the carbon benefits for this project.

i. People living within the PAs. The maps in Annex A show the delimitations of the New PAs, together with a table listing the number of habitants per village within the PA boundaries. A note has been added to the text under the Table of Core Indicators on page 6 as follows:

The populations at the NP sites where the project will be carried out, and are dependent on natural resources [a breakdown of human population numbers per village within the PAs is shown in Annex A]

ii. Thank you and Noted - Carbon Benefits for the project will be included in the ProDoc development during PPG.

32. Indeed, given the country's small land area and the fact that villages are located throughout the territory, villages and their terroirs have been included within the protected areas. The villages located in each of the protected areas are listed in Annex 19 of the GEF-UNDP Project Document, with the number of inhabitants, the main livelihood activities, the main illegal activities and four (4) indicators reflecting the socio-economic vulnerability of the villages, in particular the presence of an access road, a school, a health center and a terroir specific to each village which may or not meet the needs of the population.

The carbon benefits, or Greenhouse gas emissions, mitigated due to a reduction of the rate of deforestation and forest restoration in protected areas have been calculated using the EX-Act Tool and added as the project indicator # 4. Please refer to the Project Results Framework in Annex A and the GEF 7 Core Indicator Worksheet in Annex F of the CEO Endorsement Request, and the Project Results Framework in Section V, GHG calculation in Annex 15, and the GEF 7 Core Indicator Worksheet in Annex 25 of the GEF-UNDP Project Document.

<p><b>Taxonomy</b></p> <p>This project is not part of the Impact Programs and, therefore, should not select the Integrated Programs keywords. Also, the conservation trust funds does keyword does not appear relevant perhaps sustainable finance is more appropriate. These are meant for effective record keeping and retrieval for the GEF, so there is no need to select so many keywords.</p>	<p>Noted and amended ? please see highlighted changes in new Taxonomy Worksheet in Annex C in revised PIF.</p>	<p>No additional comment.</p>
<p><b>Project Justification</b></p> <p>No, as mentioned above please discuss trade if the project is going to address it</p>	<p>Text has been added to the PIF, highlighted on page 10 to ensure that the following is captured in the justification (also noted in the comment for 1.1.1 above):</p> <p>Looking at CITES legislation within the Comoros will ensure that all biodiversity trade related policies are reviewed and incorporated into project activities. Ensuring that consideration of CITES listings of key biodiversity is taken into account when developing biodiversity-friendly value chains (which could include sustainable use of CITES-listed species ? species to be identified during PPG but could include reptiles and amphibians and various flora species).</p> <p>Consultations with CITES Secretariat indicate that efforts may be made with Comoros during the project lifetime, which would link to project activities on ensuring coherent legislative framework for protection of biodiversity within the PA system. Knowing the species that can or cannot be traded under CITES is important also for any biodiversity-based value chains that may be developed (which will be researched in greater detail during PPG). It was considered to be important to ensure that all value chain options were considered and that market options were left open such that the best ?deal? for nature and for people could be achieved through the project (Component 3).</p>	<p>33.Please refer to the response #22.</p>

<p><b>Baseline Scenario</b></p> <p>Yes. However, please note that there are 36 biodiversity hotspots and coelacanths are no longer considered endemic to the West Indian Ocean.</p>	<p>Noted and changed to <u>36 global biodiversity hotspots</u> on page 16.</p> <p>Coelacanth ? reference to endemicity removed on page 17 and the sentence now reads: <u>The Coelacanth <i>Latimeria chalumnae</i> is of global interest as a ?living fossil? and is listed as Critically Endangered on the IUCN Red List.</u></p>	<p>No additional comment.</p>
---	--	-------------------------------

<p><b>Incremental Cost Reasoning</b></p> <p>No, the baseline should focus on existing or planned investments and projects in this area and the GEF's role in supporting the incremental costs.</p>	<p>Following text has been added to the PIF on page 15:</p> <p>Recognising the urgency to protect key biodiversity sites and safeguard remaining natural capital, the Government of the Comoros has made considerable investment in the creation of a network of Protected Areas as the principal means to protect the unique and endangered biodiversity on the islands whilst also ensuring continuous means to support the livelihoods of the communities. This baseline investment by the Government of the Comoros and donor agencies also includes the creation of the Comoros National Parks, an agency specifically focused on management of the Protected Area landscape, as well as the hiring of personnel, the provision of basic infrastructure, and operational costs. Still in its early phase, the Comoros National Parks is establishing a robust baseline for future investments and continued inputs to managing the Parks landscape.</p> <p>The GEF project will complement baseline investments by the Government of the Union of Comoros to improve management of the new Protected Area network by addressing three problem areas where gaps have been identified (see the baseline scenario above): i. insufficient inter-sectoral knowledge and coordination of legal mechanisms for conservation resulting in poor law enforcement, continuous land degradation, encroachment and destructive harvest practices; ii. inadequate management capacity and tools for the protection of biodiversity and co-management of natural resources in the new Protected Area landscapes leading to uncontrolled incursions into protected landscape (marine and terrestrial) and declines in local species; iii. Failure to provide legal alternative income-generating activities for communities affected by the creation of the new PAs, thereby lessening anthropogenic pressures on the resources whilst guaranteeing livelihoods.</p> <p>The incremental approach of the project will be to: a) reduce the threat from encroachment and further degradation of the UoC's Protected Area Network (PAN) through application of effective co-developed park protection protocols, thereby allowing the stabilisation and, ultimately, recovery of the biodiversity of these areas; b) strengthen management of the PAN through effective and improved engagement of, and co-management with, communities to achieve biodiversity conservation goals; and c) reinforce the Government's policy for community engagement in PA management and conservation; and d) build on the Government's commitment (in its PA Expansion Strategy) to provide communities within the PAs with livelihood options compatible with nature.</p>	<p>No additional comment.</p>
--	--	-------------------------------

**Sustainability, Scaling Up and Replication**

No, it would be good to discuss plans to learn from and scale up the community engagement and private sector activities described in this project.

The project is being piloted at target sites ? successes and lessons learned will be shared and the possibilities for replication and scaling up will be addressed from the outset. This project is a natural follow-on from the PIMS ID 4950 project and will be focusing on enhancing sustainability for the new Protected Areas Agency to manage the PA Network effectively into the future. Communities and government officials have been integrated into Project ID 4950 and this GEF7 project will continue to work with these key government stakeholders.

With regard to the private sector, many value chain studies have been carried out in Comoros, but not all have been ?actioned?. The successful ventures have included development of the high-value ylang ylang distillation industry as well as the nascent ecotourism industry. As the PIF notes (footnote 4, page 4 and footnote 49, page 14), efforts will be made to strengthen the link with the Vanilla Islands Association, which comprises the official tourist authorities of Mauritius, Reunion, Madagascar, Mayotte, Comoros and Seychelles, and is responsible for the creation and promotion of combined inter-island tourism. This linkage ? and with private sector entities interested in niche ecotourism markets (a specialist ecotourism value chain expert will be contracted during PPG to elaborate on this for ProDoc development) ? will benefit many more PAs and sites across the Comoros, beyond the pilot target sites, particularly with regard to development of public-private partnerships that promote ecotourism to the new National Parks.

The following text has been added to page 18 in the PIF: With regard to the private sector, many value chain studies have been carried out in Comoros, but not all have been acted upon and developed into actual businesses. Successful enterprises have included the high value ylang ylang distillation industry as well as the nascent ecotourism industry. Project activities to strengthen the link with tourism promoters and private sector entities interested in niche ecotourism markets will benefit many more PAs and sites across the Comoros, beyond the pilot target sites, particularly with regard to development of public-private partnerships that promote ecotourism to the new National Parks.

34. The project includes the elements needed for scaling-up its outputs and outcomes, first across the national parks and within the country, and potentially in other countries with similar issues and context. Replication elements include i) developing participatory land-and coastal use plans that will provide commonly agreed frameworks to coordinate the conservation and restoration interventions of all current and potential partners within the national protected areas (output 1.2), protocols for the monitoring of biodiversity that enable of communities and other stakeholders to participate (output 2.1), and management plans for natural resources that support value chains (output 2.2), ii) conducting a participatory assessment of community-based co-management models to provide a set of participatory management approaches that could be adapted and applied in other sites, iii) involving all actors in decision-making, planning, monitoring, evaluating and learning, iv) building capacities at all levels to ensure effective participation and implementation of interventions by all stakeholders, including women and PWD, v) strengthening

<p><b>Stakeholder Engagement</b></p> <p>Yes. It would strengthen the PIF to describe a bit more the discussions that have a happened with communities on this project.</p>	<p>The stakeholder consultations regarding this project are extensive and meetings were held across the three islands of the Union of the Comoros. During PIF preparation, an Inception meeting was held with key stakeholders, including community leaders, women's associations, CSOs, who were all aware of the project particularly given their active involvement in the PIMS 4950 project. Visits to potential project sites were carried out during PIF preparation (mission report of international consultant are available, noting the participants present, the working group sessions that were held, and the field sites visited). In addition, three separate validation workshops were held to confirm approval of the draft PIF (one validation workshop per island), where it was highlighted that the comments and inputs made by stakeholders at the Inception meeting (summary was provided at the workshop) had been incorporated into the draft PIF. Active engagement by all participants in thematic working groups that were set up led to further refinement of the PIF and secured 100% validation.</p> <p>UNDP Country Office in Comoros maintains active and engaged relationship with communities.</p>	<p>No additional comment.</p>
--	--	-------------------------------

**Gender Equality**

Yes. We look forward to seeing how an inclusive approach is taken in the development of the full project.

Thank you. A gender strategy will be developed during PPG and the project will be developed taking into consideration the GEFSec's review comments and ensure that an inclusive approach is taken.

As noted on page 15 in the PIF, women in the Comoros are generally included in decision-making processes and benefit-sharing, and profit from a matrilineal society that ensures that women inherit family land, own their own houses and are able to obtain micro-credits for small enterprise creation. However, gaps in empowerment remain and the project will ensure that a gender strategy is formulated that will guide all activities under the Project and that women are included in all capacity building, training, co-development of plans, and participation in all consultations and activities.

35. As part of interventions to achieve Outcome 5, the project will support the development, implementation, assessment and adaptation of Gender and People With Disabilities (PWD) action plans, as described in Section IV ? Results and Partnerships of the UNDP-GEF Project Document.

During the PPG, a gender analysis and a detailed Gender Action Plan (included under Part II: Project Justification - 3. Gender Equality and Women's Empowerment of the CEO Endorsement Request) were developed to ensure gender mainstreaming in the project; specific gender-disaggregated indicators have been identified for monitoring and a gender specialist will be part of the Project Coordination Unit (PCU) to facilitate improvements to gender equality and women's empowerment.

The project includes specific actions to alleviate the constraints identified in the gender analysis, promote specific support for women through all interventions, and encourage their active involvement in participatory decision-making processes. It will support the development of value chains, based on the exploitation of plant and fish resources that

<p><b>Risks</b></p> <p>Yes. During PPG, it will be important to consider CC effects on potential livelihood activities supported by the project</p>	<p>Noted and will be included in Initiation Plan and be addressed during PPG.</p> <p>We have already mentioned that the Project will coordinate with other projects being carried out by UNDP Comoros and others, including climate change [eg <u>Strengthening Comoros capacity to manage potable water resources in the context of climate change</u> (GCF ID FP094, ends 2026 ? US\$ 44,299,263). Please see pp 14 and 21.</p>	<p>36. Feasibility studies, including the potential of resources to withstand exploitation, and Environmental and Social Impact Assessments will be conducted for every potential livelihood option through value chains based on the use of resources from the national parks. These studies and assessments will include climate change impacts on the resources and ecosystems.</p>
---	---	--



**Coordination**  
Yes.  
As the agency knows, the implementation and execution roles on GEF projects are meant to be separate per policy and guideline. The GEFSEC will analyze any requests for dual role playing by an agency at the time of CEO endorsement and only approve those cases that it deems warranted on an "exceptional" basis. We strongly encourage the agency to look at third party options as a preferred way forward. We also strongly encourage the agency to discuss any and all options for execution that do not include the government with the GEFSEC early in the PPG phase. The technical clearance of this PIF in no way endorses any alternative execution arrangement

Noted. As indicated in the PIF (page 22), third party options to provide execution services will be analysed during PPG in full consultation with GEFSEC and Government.

37. One of the requirements to implement the project is the selection and engagement of an Implementing partner. The General Directorate for Environment and Forestry was identified as the implementing Partner for the project. However, following a micro assessment conducted, the Directorate was rated as "High Risk" and thus, in accordance with the POPP, cannot provide execution support under full NIM modality. However, the POPP does also make the provision for the CO to request for approval from OFRM through the respective Bureau to allow a "High-Risk" partner to serve as an implementing partner and provide execution role. On this basis, the CO requested a waiver that the Project Management Unit be still based at the General Directorate for Environment and Forestry providing execution support on the following grounds:

- (i) the General Directorate for Environment and Forestry is the national structure whose mandate is to ensure the conservation of biodiversity in the country and has a long experience in the area.
- (ii) The CO has worked with the Directorate in three previous projects

COMMENTS SUBMITTED BY COUNCIL MEMBERS ON THE GEF DECEMBER 2019 WORK PROGRAM

**France Comments** ? The ?Biodiversity Protection through the Effective Management of the National Network of Protected Areas in the Comoros? project will complement the following two projects:

- AFIDEV, an AFD project launched in December 2019, which supports the peripheral areas of the Karthala Park (*Grande Comores*) and Mon Ntringui (*Anjouan*). Reinforcement of these 2 parks is meant prevent negative effects from the planned revitalization of the 3 main export sectors of the Comoros (which remains a major point of attention of the project, rated B + in environmental and social risks for these reasons).

- GEREM, an AFD project currently under development for a desired start in 2020, which will further the support to the Moheli park (1st and only really operational park to date in the Comoros).

? The envisaged GEF funding should be used to finance phase 2 of the RNAP project (already implemented by UNDP). Phase 1 seems to have produced results which have yet to be consolidated or even discussed. France wants better coordination between the RNAP project and the GEREM project, in particular on the following activities:

- capacity building of the Comorian agency for protected areas;
- harmonization of the various strategies at the national level (in an operational and non-blocking manner);
- the implementation of a financial strategy for the network;
- monitoring and collecting data relating to the island's biodiversity;
- development and roll out of a tool to support biodiversity management (in collaboration with the agents of the Moheli park);
- link between " integration of local population in this management" and " operation of the park";
- identification of long-term livelihoods that can be transformed into income-generating activity (in collaboration with the agents of the Moheli park).

38. The team in charge of the project feasibility study GEREM (which provides for an investment of ? 6 million to support the National Park of Moheli - PNM) has worked very closely with the team responsible for the implementation of the project PIMS 4950. According to the information provided, the feasibility study has been carried out but has not yet been validated, pending the production of the development plan for the island of Mwali whose development process (in progress) has been disrupted due to the context of the COVID pandemic. It has therefore not yet been possible to work on identifying synergies between the two projects. The team responsible for the implementation of the PIMS 4950 project, the Conservators of national parks and the National Coordinator participate in all the meetings of the PNM steering committee and, reciprocally, the Director of the PNM and the Chairman of the PNM Management Committee participate in all the steering committee meetings of the PIMS 4950 project.

Regarding the AFIDEV project, which is to intervene on the outskirts of the national parks of Karthala (island of Ngazidja) and Mont Ntringui (island of Ndzuani), the consulting firm recruited to carry out the impact study was fully supported by the PIMS 4950 project teams working in national parks.

The collaboration established for the initial stages of design of these two projects will be continued by the Conservators of National Parks and the National Coordinator of the new UNDP-GEF project in the following stages of development and implementation to optimize the complementarity of interventions in the island of Mwali and the national parks of Karthala and Mont Ntringui.

Germany would like to suggest that the following points are taken into account in the further project drafting

Component 1: Inter-ministerial dialogue should be strengthened with a view to achieving true cooperation and coordination between the ministries. A simple dialogue might not result in the intended change of behavior.

39. As explained in the comment #21, the National Parks Agency will hold this coordination role thanks to its multistakeholder composition:

The Protected Areas Management Agency was created on June 20, 2021 and is responsible for managing protected areas in accordance with the Law on the PA System including, among other things, recommending to the Minister in charge of PAs modifications to existing PAs (on its own initiative or that of other administrations), coordinating the studies and consultations required for such modifications, and developing and maintaining the institutional dialogue necessary to ensure the integration of PAs in the development framework of the country, including the promotion of ecotourism activities in accordance with the PA Development and Management Plans. The composition of the Agency enables it to fulfill this coordination role. Indeed, the members of the Agency bring together people who represent the State and the Regional and Local Authorities concerned by PAs, including the various ministries in charge of PAs, Tourism, Budget and Finance, Scientific Research, Fisheries and Aquaculture, and Agriculture, Governorates, Communes, Local Communities, Groups and Associations of Operators in the ecotourism and fisheries sectors, NGOs and local and international associations whose fields of activity are consistent with the purpose of the Agency, personalities with skills relevant to the purpose of the Agency and donors. With this composition, the debates on the respect for the integrity of protected areas can take place and be resolved within the Agency. Depending on the issues involved, the agency may invite, among others, representatives of the following institutions as personalities with relevant skills: the Land Service within the General Administration of Taxes and Domains, the National Directorate of Planning and Infrastructure (Ministry of Regional Planning and Urban Planning, in charge of Land and Land Transport), and the National Agency for the Promotion of Investments (within the Ministry of Economy, Investments, Energy, in charge of Economic Integration, Tourism and Handicrafts).

Component 2: Clarify and ensure the long-term maintenance of the development of a national biodiversity database as well as of the community-management models beyond the project timeframe

40. Database: The PIMS 4950 project has strengthened the DGEF GIS office to support the Comoros PAs, including field equipment, computer hardware and software needed to collect, input and process geo-referenced data, and report results. Data are collected as part of the ecological monitoring program conducted by Ecoguards under the supervision of the Conservateur of each national park or by partners. However, the data has yet to be gathered in a unified and coherent database, collected in all national parks, and secured within a permanent structure. Data are currently entered in independent files and monitoring data on corals, seagrass and sea turtles are recorded in regional databases.

As part of interventions to achieve Output 2.1 related to biodiversity monitoring protocols and operationalization of a national biodiversity database (described under Section IV of the UNDP-GEF Project Document ? Results and Partnerships), the project will recruit a regional consultant with expertise in the design and management of data systems to support the design of an information system, develop the architecture of the database and ensure its operationalization with the support of the GIS Officer of the Project Coordination Unit (PCU), make recommendations on the responsibility for its management and on the financing of its operation and updating to ensure its sustainability. A second mission will complete the operationalization and presentation of the database to the PAs? Agency staff and DGEF, and train the staff of the NP Agency on its use. Data will be recorded in the PA database by the NP management teams and integrated at the network level, to be used periodically to calculate statistics, produce graphs and maps for individual PAs and at the network level, in order to monitor and assess the effectiveness of management measures in achieving conservation objectives at site and network levels. The database will initially be hosted at the DGEF, then transferred to the MAFETH GIS service when it is set up.

The Ecoguards will be trained to apply simple ecological and biodiversity monitoring protocols and carry out ecological monitoring autonomously according to protocols, routes, and schedules previously established with the NP Conservateurs and the PCU Monitoring and Evaluation Officer, and to record information into a database developed for this purpose. Their permanent presence in the field throughout the PAs allows them to contribute effectively to environmental and biodiversity monitoring during regular routines.

Community management models: Several community management models have evolved over the years, at the initiative of communities that have become aware of environmental issues in their environment and through various interventions that have taken place over the past thirty years. A few models have been identified as part of the PPG and will be completed with the support of the village co-management committees in order to cover all community experiences. The Community Mobilizers of each NP will document each model with the support of the village co-management committees to describe how communities have been involved in the conservation of resources and the environment in their areas, the type of partnership or governance established, investments,

**GEF SECRETARIAT REVIEW FOR FULL/MEDIUM-SIZED PROJECTS - December 21 2021**

<b>GEF Secretariat Comments to GEF ID 10351 - December 2021</b>	<b>Agency Response</b>	<b>Reference</b>
---	------------------------	------------------

<b>GEF Secretariat Comments to GEF ID 10351 - December 2021</b>	<b>Agency Response</b>	<b>Reference</b>
<p>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?</p> <p>Secretariat Comment at PIF/Work Program Inclusion 12/20/2021</p> <p>No, please address the following:</p> <p>1.3.3 - We are concerned about the inclusion of mobile tower sites and their potential impacts on the natural values of the parks as well as potentially reducing the visual attractiveness of the park (this is a particular concern in relation to tourism). How will these</p>	<p>The interventions foreseen as part of the project are negotiations for the payment of compensation for the installation of telecommunication towers in the NPs, and not the construction of these towers. The following text is added as a footnote to paragraph 99 to clarify the project intervention:</p> <p>These towers were built in 2008 by Telecom and in 2016-2017 by Telma, thus prior to the creation of the new national parks on the Ngazidja and Ndzuanu islands, although the steps for setting up the PA network had been initiated for several years. Since 2016, 110 towers have been built by the Telma company, which plans to build 15 more. In those years, only the Moh?li Marine Park had been created (2001) and later converted into the Moh?li National Park (2015) through the integration of a large part of the island's terrestrial territory. Negotiations for the towers built in the Moh?li National Park - without the prior consent of the Park management authorities - led to an agreement for the financing by Telma of the park's surveillance including the supply of 4 motorcycles, 4 computers and payment of the salary for 3 eco-guards for an unlimited period. The project to build and operate the towers had not until recently been the subject of any environmental impact assessment (EIA). However, in 2021, Telma undertook a procedure to ensure the environmental compliance of its facilities, including those that have already been built, and stated that it was prepared to dismantle any installation located in habitats critical to biodiversity and to negotiate with the DGEF and the National Parks Agency the compensation payment for towers located inside a PA but outside critical habitats, according to the polluter-pays principle. The ecological study entrusted to the University of Comoros showed that 10 towers were located within the boundaries of PAs. Ongoing negotiations are considering the payment of compensation for the socio-economic losses of local communities and for impacts on biodiversity, as well as the potential dismantling of all or part of these 10 towers.</p>	<p>(GEF-UNDP Project Document, Section IV. Results and Partnerships, Output 1.3, page 31, paragraph 99)</p>

GEF Secretariat Comments to GEF ID 10351 - December 2021	Agency Response	Reference
<p>3.5 - It is unclear that there would be a particular national market for certified products, making marketing challenging if people are uninterested or unable to pay a price premium or select certain products. The project seems to put significant emphasis on setting this up without confirming that there are buyers. We recommend reviewing and applying the advice in STAP's guidance document on certification.</p>	<p>Thank you for your comment and advice. As stated in paragraph 160 (under Activity <i>3.1.1 Feasibility studies of value chain options based on ecosystem services in protected areas</i>), the value chain options were strategically selected based on the following criteria: <i>i</i>) products based on ecosystem goods and services provided by PAs, <i>ii</i>) accessible to local populations, <i>iii</i>) for which there is a strong or growing demand in the local market - based on the experience of the project development team ? or that meet the needs of a clientele whose recurring return to the Comoros is foreseeable (the diaspora), <i>iv</i>) to which private sector actors are already committed and interested in engaging with local PA communities to expand the value chain, and <i>v</i>) whose use offers prospects of providing livelihood activities to a high number of beneficiaries within the local communities. Although the team was well aware of their importance, it was not possible to carry out formal market surveys as part of the project development activities due in particular to the disruption caused by the pandemic and related restrictions. For this reason, the Activity <i>3.1.1 Feasibility studies of value chain options based on ecosystem services in protected areas</i> has been formulated, including market studies as stated in paragraph 161 (GEF-UNDP Project Document, Section IV. Results and Partnerships, Output 3.1, page 45): ?Simplified market studies will be conducted for each of the options to reduce uncertainties and risks and to better understand the chances of success before raising the expectations of local communities and engaging them in these activities.? To address the concern raised by the GEF, the following is added under the same paragraph:</p> <p>?Feasibility studies should in particular take into account the impact of the certification process on market access and on the price structure of products or services (as determined under activity 3.4.1)?.</p> <p>Also added in paragraph 181 (GEF-UNDP Project Document, Section IV. Results and Partnerships, Output 3.4, page 50) as part of the Activity <i>3.4.1 Support to businesses in designing their business model involving partnership with cooperatives in local communities</i>:</p> <p>?The models will namely examine the impact of the certification of the products or services on the price for the end client and the willingness of clients to pay a price premium, if any, for certified products.?</p> <p>The certification process is consistent with the STAP guidance to ensure that the main threats to eco-certification effectiveness are addressed:</p> <p>(i) <b>Weak certification standards.</b> The project is proposing that the certification reflects 3 criteria: products that guarantee superior quality for consumers, decent livelihoods for producers, and preservation of the environment. Under activity <i>3.5.1 Development of a marketing strategy including a national certification and labeling system</i>, the project provides for the implementation of a product certification mechanism to ensure compliance with the 3 criteria, namely through the institutional collaboration of INRAPE, UdC, DGEF, DGRH, and the PNC Agency, to agree on the interpretation of the certification criteria and their application to the different products. (GEF-UNDP Project Document, Section IV.</p>	<p>GEF-UNDP Project Document, Section IV. Results and Partnerships, Outputs 3.1, 3.4, 3.5 Changes to indicator 11 were made in the following documents/ sections: ProDoc Section V - Project Results Framework (p. 72-73) ProDoc Annex 4. Monitoring Plan (p.145) CEO ER PART IV: ANNEXES - Annex A: Project Results Framework (p.66) CEO ER PART I: PROJECT INFORMATION ? Section B: Project Description Summary (p.3)</p>

<b>GEF Secretariat Comments to GEF ID 10351 - December 2021</b>	<b>Agency Response</b>	<b>Reference</b>
<p>Project Map and Coordinates</p> <p>Is there an accurate and confirmed geo-referenced information where the project intervention will take place?</p> <p>Secretariat Comment at CEO Endorsement Request 12/14/2021</p> <p>No, please include a map in the Portal entry.</p>	<p>To facilitate the integration of a map in the portal, a georeferenced map presenting an overview of the national network of protected areas and indicating the location of the 6 national parks on the 3 islands has been added in the annexes that present the PAs and their individual maps.</p>	<p>CEO ER Annex E: Project Maps and Coordinates (page 98)</p> <p>ProDoc Annex 2. Project maps and Geospatial Coordinates of project sites Figure 1.</p> <p>Overview of the network of national parks of the Comoros on the islands of Ngazidja, Mwali and Ndzuani. (p.113)</p>



<p>Amendment to Governance and Management Arrangements</p>	<p>In light of the Audit of UNDP's GEF programming and policies, UNDP has taken the decision to ensure that all projects with High Risk Implementing Partners are undertaken using Full Country Office Support to NIM or DIM modalities, in line with UNDP's HACT policy. Prior, exceptional approval had been granted by GEF Sec for Direct Payments Only. However, in line with this recent UNDP policy change, a revised request was submitted and approved for amended implementing arrangements.</p> <p>Key changes are as follows:</p> <p>The project is Full CO Support to NIM modality and therefore all grant funds for the four project components (Components 1, 2, 3 and 4) will be managed by UNDP, in accordance with Full CO Support to NIM requirements. The DGEF was HACT micro-assessed in 2020, which resulted in an overall rating of High Risk. In light of this High Risk rating, and in line with UNDP's Policy and Operations Policies and Procedures (POPP) to provide Full Country Office Support to National Implementation Modality (NIM), the Government of the Union of Comoros (through MAFE and DGEF) has requested UNDP to provide execution support for the following services for this project: Financial management: payment processing, issuing checks, creating vendor forms and managing vendor profiles; Staff selection and recruitment and recurring personnel management services; Recruitment of national and international consultants; Procurement of goods and services; Administration and logistics; Information and technology; Travel management.</p> <p>A new Letter of Agreement (LOA) has been signed between the Government and UNDP to confirm the above arrangement (Annex 29).</p> <p>The capacities of DGEF will be HACT micro-assessed in due course during project implementation.</p> <p>The Implementing Partner and GEF OFP have requested UNDP to provide support services in the amount of USD 232,587 for the full duration of the project, and the GEF has agreed for UNDP to provide such execution support services provided however that such costs will be charged to the project budget. The execution support services have been set out in detail and agreed between UNDP Country Office and the Implementing Partner in a Letter of Agreement (LOA). This LOA is attached to this Project Document. The capacities of DGEF will be HACT micro-assessed in due course during project implementation.</p> <p>UNDP's implementation oversight role in the project will be provided by identified staff in UNDP Comoros' Sustainable Development Unit, specifically: Programme Analyst in charge of Environment/ Disaster Risk Reduction, the Programme Management Support, the M&amp;E</p>	<p>GEF-UNDP Project Document, Section VII - Governance and Management Arrangements, Section IX ? Total Budget and Work Plan Annex 29. LOA for UNDP Implementation Support Services Annex VII - Request Note for Full Country Office Support to NIM CEO ER Part II: Project Justification - 6. Institutional Arrangement and Coordination (pages 50 to 57)</p>
--	---	---

<p>In line with the PCAT assessment, a strategic risk has been added in the Project risks and mitigation measures</p>	<p><u>Description of the risk:</u> Potential conflict of interests and related damage to UNDP's reputation due to blood relationship between the Director of the Implementing Partner (DGEF) and the Head of the UNDP Programme Unit.  <u>Assessment of the risk impact:</u> Medium  <u>Assessment of the risk likelihood:</u> Certain  <u>Overall assessment of the risk :</u> High  <u>Mitigation measure:</u> To manage this risk, all UNDP-funded projects executed by DGEF will be supervised directly by the UNDP Deputy Resident Representative.</p>	<p>GEF-UNDP Project Document, Section IV. Results and partnerships. Risks ? Table 4 p. 63 and Annex 6. UNDP Risk Register p.162 CEO ER Section 5. Risks p.45</p>
---	---	--

**GEF SECRETARIAT REVIEW FOR FULL/MEDIUM-SIZED PROJECTS - March 2022**

<p><b>GEF Secretariat Comments to GEF ID 10351 - March 2022</b></p>	<p><b>Agency Response - UNDP March 15, 2022</b></p>	<p><b>Reference</b></p>
<p>Minor amendment: Please submit the forms for a minor amendment to increase the budget.</p>	<p>-</p>	

GEF Secretariat Comments to GEF ID 10351 - March 2022	Agency Response - UNDP March 15, 2022	Reference
<p>Co-financing classifications:</p> <p>General Directorate of Environment and Forests:</p> <p>- Grant: change ?Grant? to ?Public Investment?</p> <p>- In-kind: change ?Investment Mobilized? to ?Recurrent expenditures?</p> <p>National Directorate of Agriculture and Livestock Strategy</p> <p>- Grant: change ?Grant? to ?Public Investment?</p> <p>National Directorate of Tourism and Hospitality: change ?Grant? to ?Public Investment?</p> <p>National Directorate of Waste Management: change ?Grant? to ?Public Investment?</p> <p>AIDE NGO, Banda Bitsi Association, House of Civil Society Organizations, UMAMA Association, Ulanga Ngazidja: report the total co-financing amount as ?In-kind? and ?Recurrent expenditures? (instead of separating ?grant? and ?in-kind?)</p> <p>Outcomes of these grant projects serve as ?in-kind? activities to</p>	<p>Co-financing classifications:</p> <p>Changes to the classification of co-financing have been made in accordance with the recommendations of the GEF for the Directorates of Environment and Forests, Agricultural Strategies and Livestock, Tourism and Accommodation and Waste Management, for the NGO AIDE, the Banda Bitsi Association, the House of Civil Society Organizations, the UMAMA Association, Ulanga Ngazidja and also for Women's Sustainable Development and Food Security Platform.</p>	<p>GEF-UNDP Project Document, Section VIII on Financial Planning and Management - Table 5 on Co-financing and contributions to the project, pages 84-88 CEO Endorsement Request, Part I on Project Information - Section C ? Confirmed sources of co-financing for the project, p.4.</p>

GEF Secretariat Comments to GEF ID 10351 - March 2022	Agency Response - UNDP March 15, 2022	Reference
<p>? MAEECHA NGO: Please submit an English translation with this letter. If the entity intends to provide the amount in cash, keep the entry as it is (Grant/Investment mobilized). If not (for instance, this entity is the recipient of this funding in grant and intends to execute the project to support the GEF project), report the co-financing as ?In-kind? and ?Recurrent expenditures?</p>	<p>MAEECHA NGO: An English translation of MAEECHA co-financing letter is provided for submission. This co-financing is reported as ?In-kind? and ?Recurrent expenditures?.</p>	
<p>? Mitsamiouli Commune: change ?Civil Society Organization? to ?Recipient Country Gov?t?. Change ?Grant? to ?Public Investment?.</p>	<p>The co-financing classification for the Mitsamiouli Commune is changed to Public Investment as recommended. The commune was already identified as Recipient Country Government in the Section C on CONFIRMED SOURCES OF CO-FINANCING FOR THE PROJECT of the CEO Endorsement Request (page 4).</p>	<p>CEO ER - Section C (page 4).</p>

GEF Secretariat Comments to GEF ID 10351 - March 2022	Agency Response - UNDP March 15, 2022	Reference
<p>Core Indicators: In Annex A ?Project Results Framework?:</p> <p>(i) Two protected area WDPA ID remains N.A under CI 2.2 Please add those, as these are mandatory at CEO Endorsement stage.</p> <p>(ii) GEF Core Indicator 3 (Area of land restored) target - please include CEO Endorsement level targets in the Results Framework, aligned with those targets found in Core Indicator Table. GEF Core Indicators should be explicitly mentioned in the Results Framework in Annex A.</p> <p>(iii) GEF Core Indicator 5 (Area of marine habit under improved practices?) ? please include CEO Endorsement level targets in the Results Framework, aligned with those targets found in Core Indicator Table. GEF Core Indicators should be explicitly mentioned in the Results Framework in Annex A. Also, the value for core indicator 5 (ha) is missing in core indicator table. Agency provided</p>	<p>(i) Protected area WDPA ID: The WDPA ID has been added in the Core Indicator Worksheet for the Shissiwani National Park. Only one occurrence of a missing WDPA ID was found.</p> <p>(ii) GEF Core Indicator 3 (Area of land restored) target The CEO Endorsement level targets (total areas for baseline, mid-term and end-of-project) have been added for the project indicator #7 in the Project Results Framework. GEF Core Indicator 3.2 is explicitly mentioned in the formulation of the indicator #7.</p> <p>-</p> <p>(iii) This indicator was removed from the Core Indicator Worksheet because the National Parks Management Agency does not have the data necessary to document this indicator. This indicator had been included by mistake. While the number of fisheries that are expected to meet 3<sup>rd</sup> party certification is known (5 fisheries), the corresponding <u>areas</u> where fishing is actually taking place and where fishing practices are expected to improve are not documented.</p>	<p>(i) CEO ER - Annex F: GEF 7 Core Indicator Worksheet (page 111)</p> <p>(ii) UNDP-GEF Project Document - Section V. Project Results Framework (page 71)</p> <p>CEO ER - PART IV, Annex A: Project Results Framework (page 65)</p> <p>(iii) CEO ER - PART IV, Annex A: Project Results Framework (page 112)</p>

<b>GEF Secretariat Comments to GEF ID 10351 - March 2022</b>	<b>Agency Response - UNDP March 15, 2022</b>	<b>Reference</b>
<p>- On Budget: the way the budget is presented (see the latest pages in the attached CEO ER Portal view) makes impossible for a reader to assess the reasonability of each budget line charged to the different sources (project's components ? M&amp;E ? PMC). This presentation is aligned with UNDP's budget structure, but not with GEF budget's structure as included in Guidelines. For instance, per Guidelines the project staff should be covered by the GEF Portion and the Co-financing portion allocated to PMC ? however, with the current presentation one cannot infer how much is meant to be paid to each member of the project's staff. Please ask the Agency to present the budget in a comprehensive manner with details using the GEF template, so a reader (including Council Members, who will review the project) can understand and assess accordingly.</p>	<p>The Government of Comoros is unable to co-finance the payment of project staff salaries. Over the past two years, the COVID-19 pandemic has led to a decrease in public revenue due, in particular, to travel restrictions. Traders being restricted in their movements have not been able to continue their commercial activities which has resulted in a drastic reduction in customs revenue and thus a reduction in public revenue. In addition, the Government had to bear unforeseen expenses, in particular covering the hospitalization expenses of patients affected by COVID-19 and the costs related to the vaccination of the population (purchase of vaccines and organization of the nationwide vaccination campaign).</p> <p>Thus, in the budget plan, the salary of all project staff for each of the components as well as for Monitoring-Evaluation and project management is entirely under GEF funds. The only investments mobilized for co-financing are the TRAC funds. Under each component, these funds cover travel-related expenses that cannot be paid through GEF funds. In addition, under component 1, TRAC funds are allocated for the recruitment of a consulting firm to build the DGEF's capacities (to address the capacity gaps identified through the HACT assessment) and for the recruitment of staff to support the operationalization of the FEC (environmental fund) according to the agreement signed between the UNDP and the FEC.</p>	

<b>GEF Secretariat Comments to GEF ID 10351 - March 19 2022</b>	<b>Agency Response - UNDP April 7, 2022</b>	<b>Reference</b>
<p>- The LOE does not match the amount of the project - \$4,516,305 - but rather is \$10,000 short of that number.</p>	<p>Thank you, the LOE is now correctly provided for the amount of the project - \$4,516,305. We confirm that the additional STAR amount was already integrated into the project following the request from GEF Sec FP last July.</p>	<p>Portal - Roadmap</p>

- Co-financing: two of the previous comments have not been addressed:  
 - General Directorate of Environment and Forests ? Public Investment: change ? Recurrent expenditures? to ? Investment mobilized?  
 - House of Civil Society Organizations, In-kind: change ? Investment mobilized? to ? Recurrent Expenditure

In our understanding of the GEF policy on co-financing, the contribution of the Directorate General of Environment and Forests should be Recurrent expenditures and not Investment mobilized. The contribution will be provided through projects implemented under the Directorate and not through grants or cash provided to the project. Based on this understanding we have changed also other co-financiers to Recurrent expenditures (in pink).

Portal - Part I, C; Roadmap ? CEO ER (p. 4)

Sources of Co-financing	Name of Co-financier	Type of Cofinancing	Investment Mobilized	Amount (\$)
GEF Agency	UNDP TRAC resources	Grant	Investment Mobilized	400,000
Recipient Country Government	General Directorate of Environment and Forests (MAFETH)	Public Investment	Recurrent Expenditures	7,294,156
Recipient Country Government	National Directorate of Agriculture and Livestock Strategy (MAFETH)	Public Investment	Recurrent expenditures	7,500,000
Recipient Country Government	National Directorate of Tourism and Hospitality	Public Investment	Recurrent expenditures	500,000
Recipient Country Government	National Directorate of Waste Management	Public Investment	Recurrent expenditures	250,000
Recipient Country Government	CRDE Hamalengo-Diboini	In-kind	Recurrent expenditures	750,000
Civil Society Organization	Dahari NGO	In-kind	Recurrent expenditures	4,000,000
Civil Society Organization	AIDE NGO	In-kind	Recurrent expenditures	750,000
Civil Society Organization	Banda Bitsi Association	In-kind	Recurrent expenditures	500,000
Civil Society Organization	Union of Chambers of Commerce, Industry and Agriculture	In-kind	Recurrent expenditures	150,000



●Budget:  
- the budget in this resubmission is not only off the margins, but also nothing has changed from the previous submission: it is not possible to know how much from the project staff is going to be covered by the project's components and how much by PMC (see an example below of only one budget line) ? under this presentation, *it is not possible to assess the reasonability of the items that will be charged to the different sources: project's components, M&E and PMC.* We need a budget that breaks down the different items (for example Project Coordinator and Administrative assistant as part of the project's staff, different consultants as part of the technical teams, different type of equipment some of which would be for the project while other

The budget has been simplified for the purpose of providing better overview of the situation and allow you to better assess reasonability of different items that are including all needed break downs. The simplified budget has been entered to Annex E and an excel version of the GEF budget with all background details has been uploaded to Portal's Roadmap.

Portal ?  
Annex E,  
Roadmap  
(GEF budget  
excel sheet)

Note: we read the Agency's comments in the Review Sheet where they said *"The Government of Comoros is unable to co-finance the payment of project staff salaries in the budget plan, the salary of all project staff for each of the components as well as for Monitoring-Evaluation and project management is entirely under GEF funds. The only investments mobilized for co-financing are the TRAC funds".* The statement presented above is not aligned with what one finds in the co-financing Table C as there are three additional Investment mobilized co-financiers (one of which is grant). Regardless, the presentation of the budget needs to be aligned with GEF guidelines (which also calls for the budget in Annex E in Portal to be the same as the excel version appended to the

We note the comment that co-financing should cover project salaries. However, due to the COVID-19 pandemic, Comoros (which is a small island developing state, fragile, highly dependent on remittances from the diaspora and external aid, with a weak economy) has experienced a major contraction. Expected at 4.4% in 2020, economic growth was only 0.2%. Therefore, public finances have been seriously affected by the pandemic and the Government IP is not in a position to provide resources to finance project staff. However, co-financing contributions from the three Departments of Agriculture, Tourism and Waste Management and from the Mitsamiouli Commune are ensured through projects implemented under these administrations, and as such are identified as "Recurrent expenditure". We have therefore made changes to Table C of the CEO Approval Request based on guidance provided by the GEF reviewer. There might be a misunderstanding on the nature of the co-financing contributions given that the grants referred to are granted to the NGOs MAEECHA and Dahari and to the House of Civil Society Organization and not to the project, and their contribution will be provided in the form of goods or services and not in cash. Therefore, in accordance with the GEF Guidelines on Co-financing, the type of co-financing for these two co-financiers is corrected to "In-kind", and "Investment mobilized" replaced by "Recurrent expenditures".

CEO Endorsement Request ? Table C, (page 4) UNDP-GEF Project Document - Section VIII. Financial Planning and Management. Table 5. Co-financing and contributions to the project (p. 85)

<p>Status of PPG: There has been no change from the previous submission, which means that there is no detailed presentation of the PPG activities financing status as requested in this section (see below) ? please amend.</p>	<p>The following information has been integrated in the Annex C: Status of Utilization of Project Preparation Grant of the CEO Endorsement Request.</p>			<p>CEO Endorsement Request - Annex C: Status of Utilization of Project Preparation Grant</p>	
	PPG Grant Approved at PIF: 100,000				
	<b>Project Preparation Activities Implemented</b>	<b>GETF/LDCF/SCCF Amount (\$)</b>			
		<b>Budgeted Amount</b>	<b>Amount Spent To date</b>		<b>Amount Committed</b>
	Formulate of the UNDP-GEF project document, CEO Endorsement Request, and Mandatory and Project Specific Annexes	67,000	83,575		
	Collect information and baseline conditions regarding: i) marine and coastal ecosystems (recent statistics and satellite data on coral reefs, seagrass and mangrove cover, considering recent degradation trends), benthic (benthic cover) and fish data (abundance and size); ii) the existing PA landscape and any plans for PAs/KBA expansion; iii) population data for key species at pilot sites; iv) current socio-economic situation at pilot sites and options for improved livelihoods; and v) livelihoods and value chain analysis of select species.	19,976	9,782		
Workshop validation of the Project Document	13,024	5,490	1,153		
<b>Total</b>	<b>100,000</b>	<b>98,8467</b>	<b>1,153</b>		

[1] Ervin, J., N. Sekhran, A. Dinu. S. Gidda, M. Vergeichik and J. Mee. 2010. Protected Areas for the 21st Century: Lessons from UNDP/GEF's Portfolio. New York: United Nations Development Programme and Montreal: Convention on Biological Diversity.

**ANNEX C: Status of Utilization of Project Preparation Grant (PPG).  
(Provide detailed funding amount of the PPG activities financing status in the table below:**

PPG Grant Approved at PIF: 100,000			
<b>Project Preparation Activities Implemented</b>	<b>GETF/LDCF/SCCF Amount (\$)</b>		
	<b>Budgeted Amount</b>	<b>Amount Spent To date</b>	<b>Amount Committed</b>
Formulate of the UNDP-GEF project document, CEO Endorsement Request, and Mandatory and Project Specific Annexes	67,000	83,575	

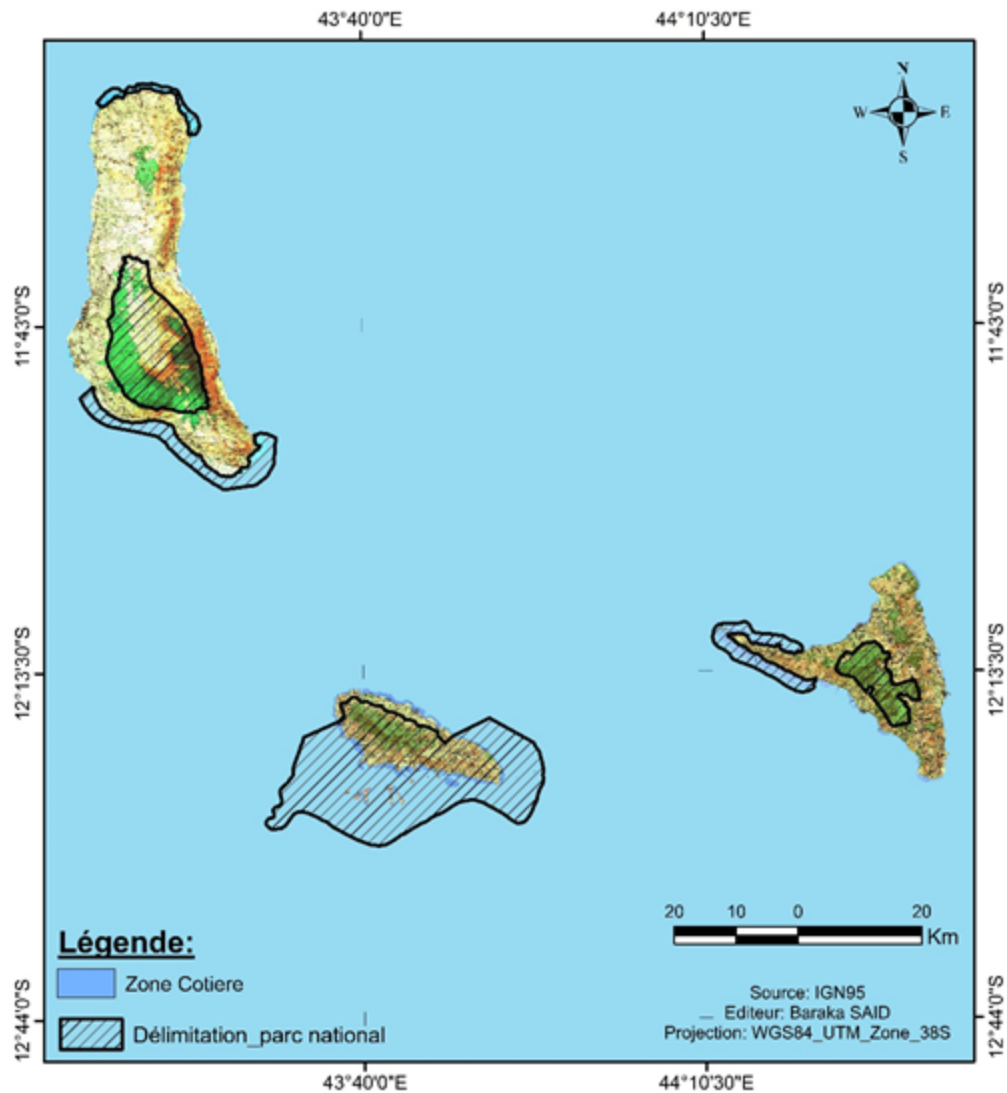
Collect information and baseline conditions regarding: i) marine and coastal ecosystems (recent statistics and satellite data on coral reefs, seagrass and mangrove cover, considering recent degradation trends), benthic (benthic cover) and fish data (abundance and size); ii) the existing PA landscape and any plans for PAs/KBA expansion; iii) population data for key species at pilot sites; iv) current socio-economic situation at pilot sites and options for improved livelihoods; and v) livelihoods and value chain analysis of select species.	19,976	9,782	
Workshop validation of the Project Document	13,024	5,490	1,153
<b>Total</b>	<b>100,000</b>	<b>98,8467</b>	<b>1,153</b>

**ANNEX D: Project Map(s) and Coordinates**

**Please attach the geographical location of the project area, if possible.**



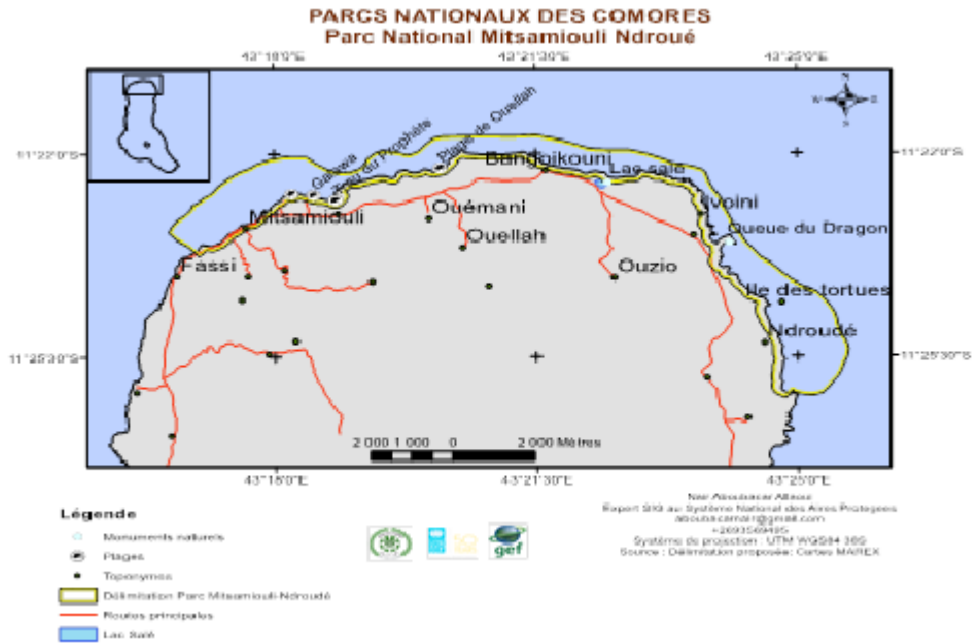
## Delimitation des Parcs Nationaux des comores



**Figure 1.** Overview of the network of national parks of the Comoros on the islands of Ngazidja, Mwali and Ndzuani. Detailed maps of each of the parks are presented under the presentation of each of the parks. The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of the Secretariat of the United Nations or UNDP regarding the legal status of any country, territory, town or region, or of its authorities, or concerning the demarcation of its boundaries or limits.

### Mitsamiouli-Ndroué National Park

Location: Ngazidja Island, 11°25'7.37"S, 43°24'59.96"E



**Figure 2.** Mitsamiouli-Ndroué National Park (on Ngazidja Island). The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of the Secretariat of the United Nations or UNDP regarding the legal status of any country, territory, town or region, or of its authorities, or concerning the demarcation of its boundaries or limits.

### Shissiwani National Park

Location: Ndzuani Island: 86°55'97"S, 41°24'07"E



**Figure 3.** Shisiwani National Park (on Ndzuani Island). The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of the Secretariat of the United Nations or UNDP regarding the legal status of any country, territory, town or region, or of its authorities, or concerning the demarcation of its boundaries or limits.

### Coelacanth National Park

Location: Ngazidja Island: 11°48'00"S, 43°14'30"E



Figure 1

**Figure 4.** Coelacanth National Park (on Ngazidja Island). The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of the Secretariat of the United Nations or UNDP regarding the legal status of any country, territory, town or region, or of its authorities, or concerning the demarcation of its boundaries or limits.

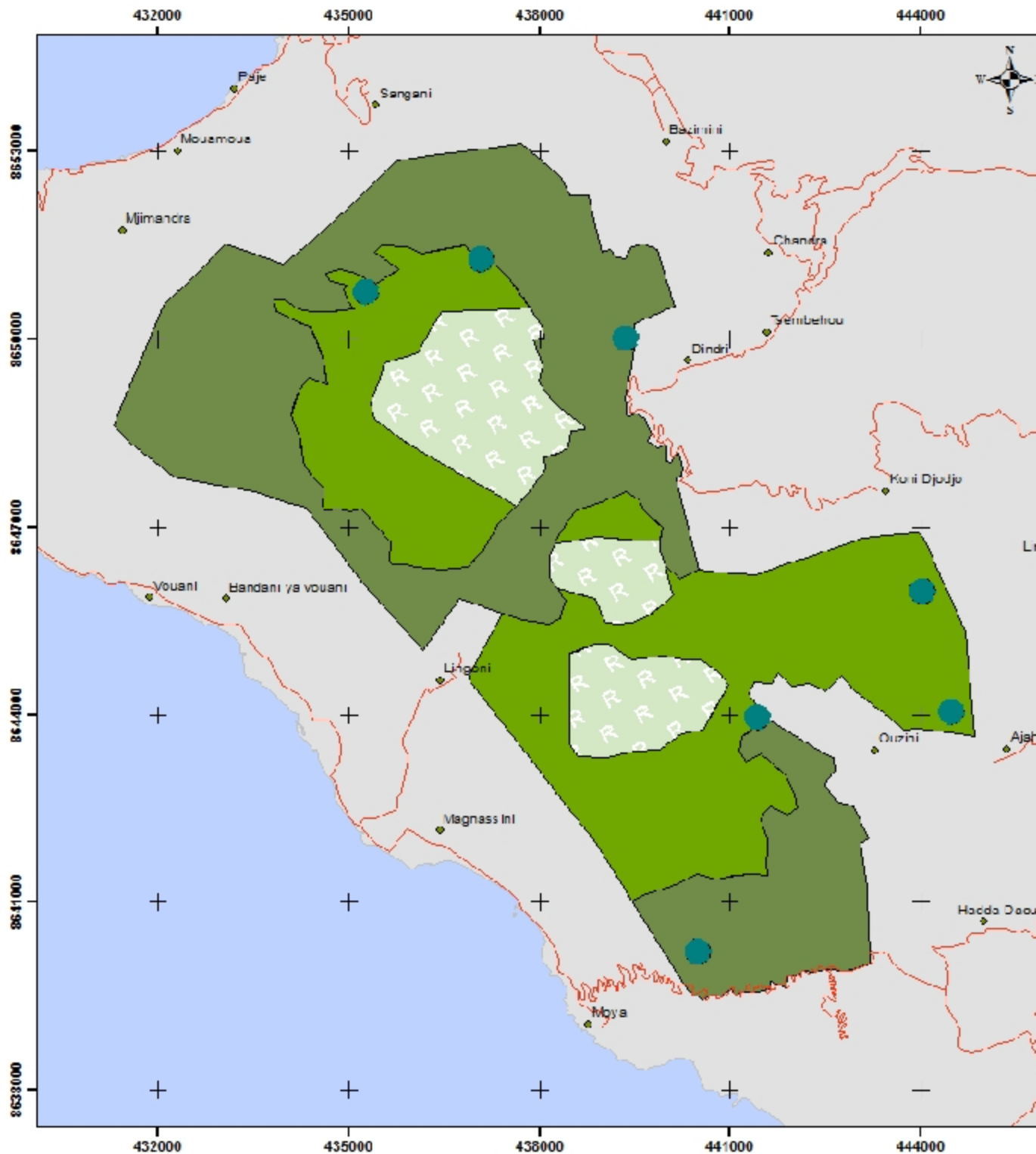
**Mount Ntringui National Park**

Location: Ndzuanu Island: 11°26'37"S, 43°24'59.96"E



# PARCS NATIONAUX DES COMORES

## Zonage du Parc National Mont Ntringui



### Legende

- ZNP
- ZJC
- ZJD
- Routes
- Villages

0 1000 2000 Meters



Maitr Akhuzhazr Allanil  
 Expert B/C au Systeme National des Aires Protegees  
 abouabamail@gmail.com  
 +2693565495  
 Systeme de projecteur : UTM WGS84 38S  
 Source : Images Pleiades , collecte de donnees sur terrain  
 Octobre 2017

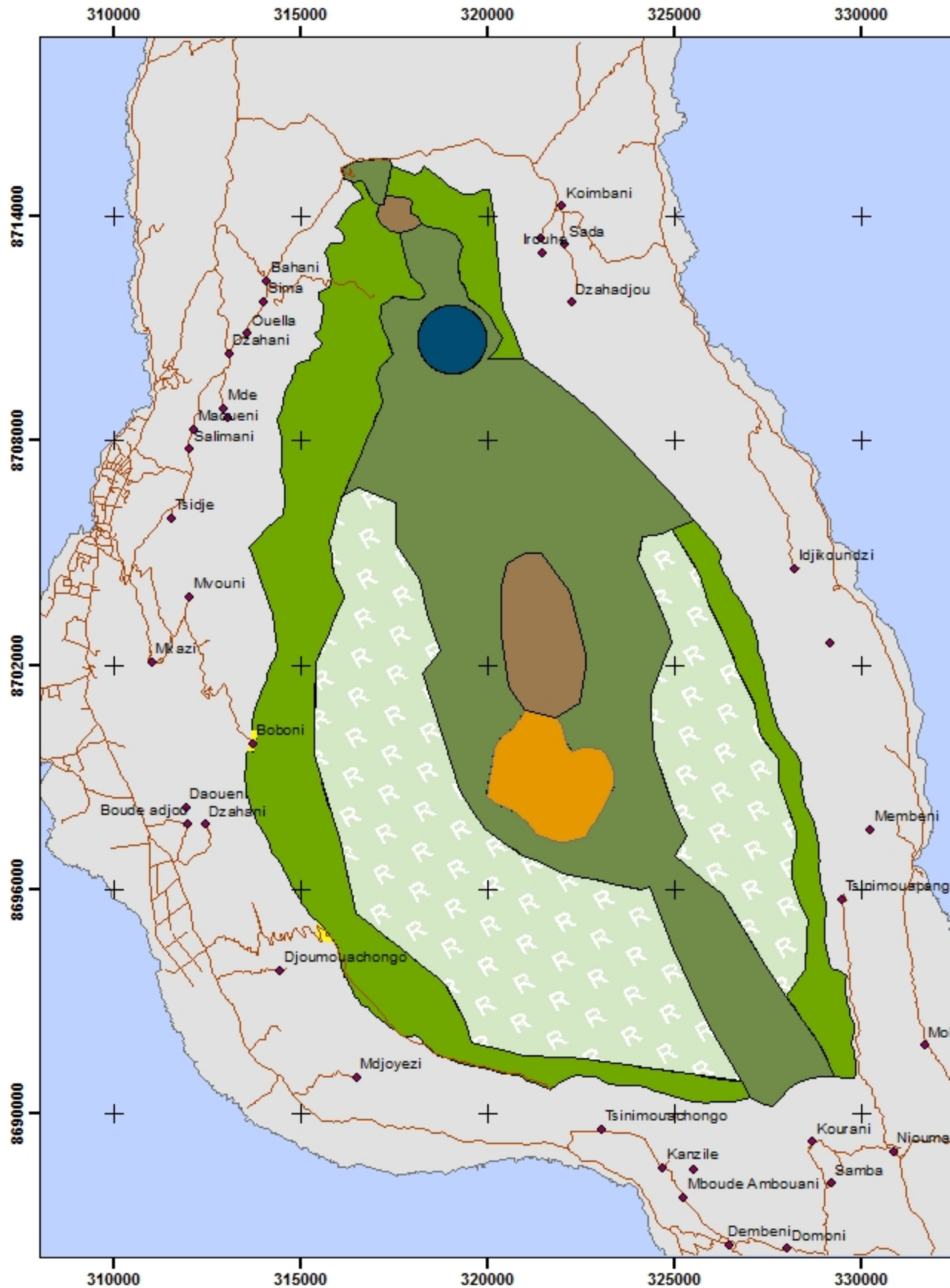
**Figure 5.** Mount Ntringui National Park (on Ndzuani Island), including zoning. The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of the Secretariat of the United Nations or UNDP regarding the legal status of any country, territory, town or region, or of its authorities, or concerning the demarcation of its boundaries or limits.

**Karthala National Park**

Location: Ngazidja Island: 11°49'30"S, 43°15'45"E

# PARCS NATIONAUX DES COMORES

## Zonage du Parc National Karthala



Legende

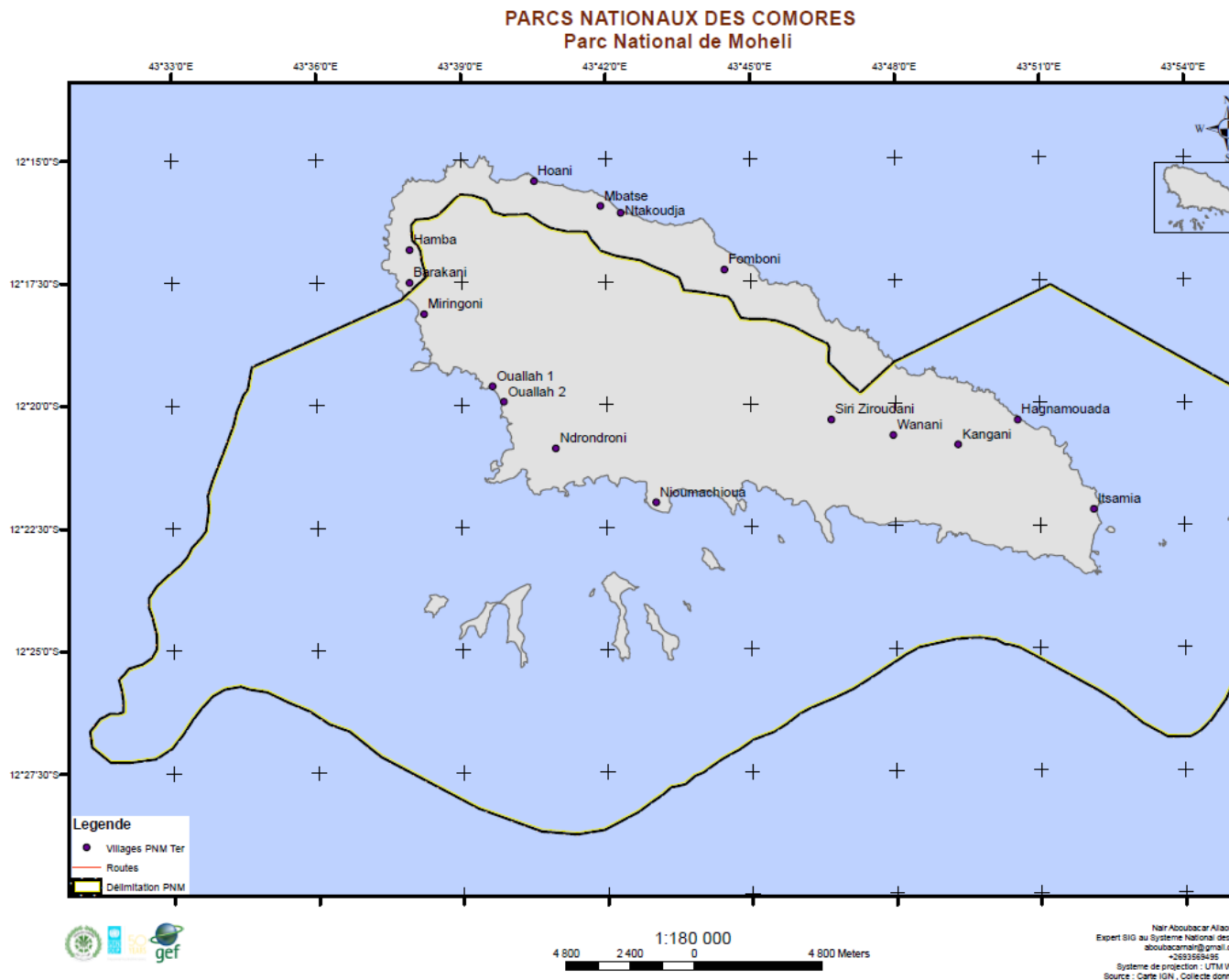
3800 1900 0 3800 Metres

Nair Abouhacar Alla

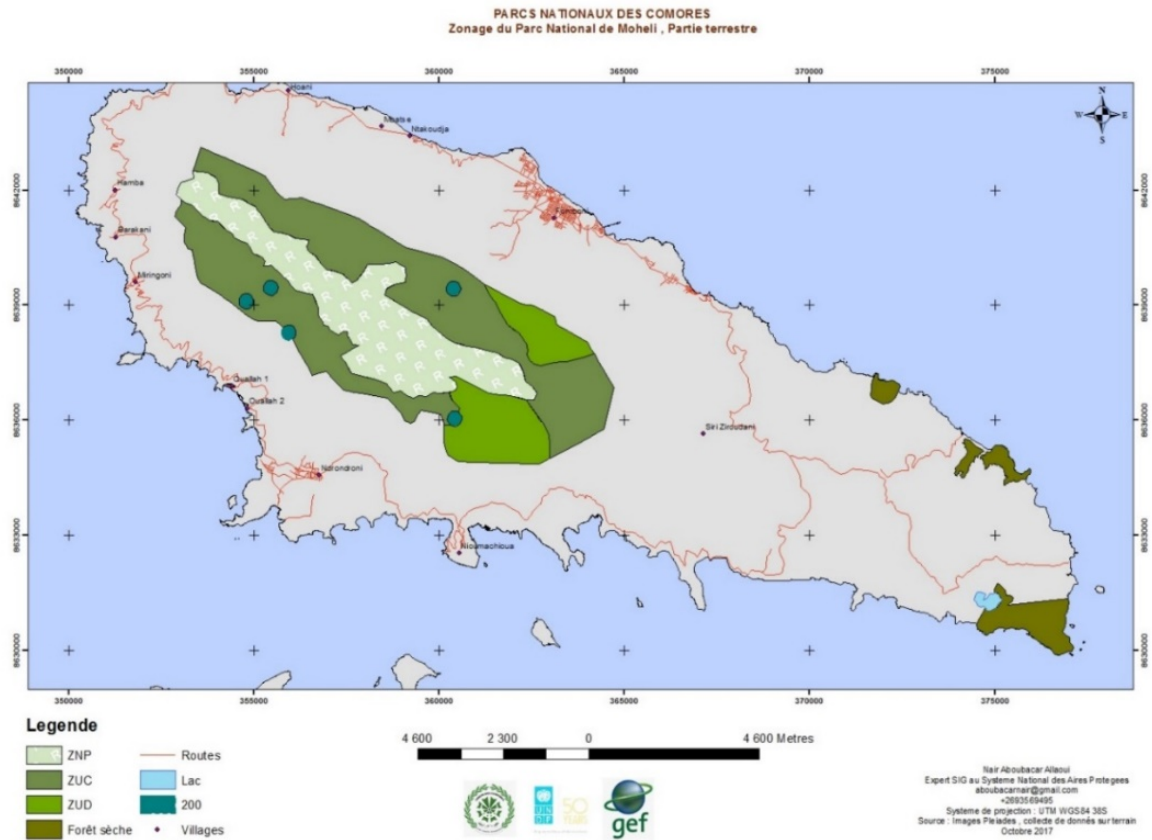
**Figure 6.** Karthala National Park (on Ngazidja Island), including the zoning. The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of the Secretariat of the United Nations or UNDP regarding the legal status of any country, territory, town or region, or of its authorities, or concerning the demarcation of its boundaries or limits.

**Moh?li National Park**

Location: Mwali Island: 12°22'10,4"S and 43°42'58,5"E



**Figure 7.** Moh?li National Park (on Mwali Island), including the delimitation of the terrestrial and marine areas. The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of the Secretariat of the United Nations or UNDP regarding the legal status of any country, territory, town or region, or of its authorities, or concerning the demarcation of its boundaries or limits.



**Figure 8.** Zoning of the forest area of the terrestrial portion of Moh?li National Park (on Mwali Island). The designations employed and the presentation of material on this map do not imply the expression of any opinion on the part of the Secretariat of the United Nations or UNDP regarding the legal status of any country, territory, town or region, or of its authorities, or concerning the demarcation of its boundaries or limits.

## ANNEX E: Project Budget Table

Please attach a project budget table.

Expenditure Category	Detailed Description	Component (USDeq.)							Total (USDeq.)	Responsible Entity <small>(Executing Entity receiving funds from the GEF Agency)[1]</small>
		Component 1	Component 2	Component 3	Component 4	Sub-Total	M&E	PMC		
Equipment	a) Monitoring equipment: 100 marine buoys @ \$10 + 100 positioning reference plates @ \$2 + 32 snorkeling equipment @ \$150 + 20 decimeters @ \$50 + 7 cameras @ \$1,500 each = \$17,500b) Material for the restoration program: small equipment, materials, fences, seedlings of native species, and protection for seedlings @ \$8,000\$ per year in years 1 to 5 = \$40,000c) Nursery equipment: recycled plastic bags @ \$2,000 + small equipment @ \$3000 + 3 greenhouses @ \$2,500 each = \$12,500Total: \$70,000		70,000			70,000			70,000	MAFETH (Ministry of Agriculture, Fisheries, Environment, Tourism, and Handicraft)
Equipment	a) Provision of material and small equipment @ \$250,000 = \$250,000.b) Office supplies. \$1594 in year 1 + \$1592 per year in years 2 to 5 = \$7,962.Total: \$257,962.			257,962		257,962			257,962	MAFETH
Equipment	Office supplies. \$2568 per year in years 1 to 5 = \$12,840					0	12,840		12,840	MAFETH
Equipment	a) Computer equipment for project staff (25%). [7 Laptops @ \$1500 + 5 computers @ \$2000 + 1 Multifunction printer @ \$2000] x 25% = \$5,625b) Internet subscription (25%) @ [1600\$/year/office for 6 offices and 5 years] x 25% = \$12,000Total: \$17,625	17,625				17,625			17,625	MAFETH
Equipment	a) Computer equipment for project staff (cost split among the 4 components or 25% per component). [7 Laptops @ \$1500 + 5 computers @ \$2000 + 1 Multifunction printer @ \$2000] x 25% = \$5,625b) Internet subscription (cost split among the 4 components or 25% per component) @ [1600\$/year/office for 6 offices and 5 years] x 25% = \$12,000Total: \$17,625			17,625	17,625	35,250			35,250	MAFETH
Equipment	a) Equipped Drone @ \$4000 + Zenmuse Camera @ \$9000 + LIDAR @ \$10,000 = \$23,000. b) Drone (not equipped) @ \$4,000 = \$4,000.c) 2 replacement battery packs @ \$350 = \$700.d) Computer equipment for project staff (cost split among the 4 components or 25% per component). [7 Laptops @ \$1500 + 5 computers @ \$2000 + 1 Multifunction printer @ \$2000] x 25% = \$5,625e) Internet subscription (cost split among the 4 components or 25% per component) @ [1600\$/year/office for 6 offices and 5 years] x 25% = \$12,000Total \$45,325		45,325			45,325			45,325	MAFETH
Equipment	Lump sum (cost split among the 4 components or 25% per component) for fuel purchase @ \$4000 and vehicle maintenance @ \$1000 per year over 5 years = \$25,000	25,000	25,000	25,000	25,000	100,000			100,000	MAFETH
Contractual services-Individual	Project coordinator / PA Expert (11.5%) 140 days @ \$100 per day = \$14,000Gender & PWD Officer (83%) 590 days @ \$32 per day = \$31,680.Communication and Knowledge Management Officer (69%) 625 days @ \$43 per day = \$35,475.Conservateurs (5) (20%) 205 days for 5 Conservateurs @ \$55 per day per Conservateur = \$56,375Community mobilizers (5) (22%) 320 days for 5 community mobilizers @ \$43 per day per mobilizer = \$68,800.Ecoguards (60) 160 days for 60 ecoguards @ \$15 per day per ecoguard = \$144,000.Total: \$350,330.				350,330	350,330			350,330	MAFETH
Contractual services-Individual	Project coordinator / PA Expert (2.5%) 30 days @ \$100 per day = \$3,000Conservateurs (5) (20%) 35 days per year for 5 Conservateurs @ \$55 per day per Conservateur = \$9,625Ecoguards (60) - 25 days for 60 ecoguards @ \$15 per day per ecoguard = \$22,500. M&E/Safeguards Officer (72%) 174 days per year @ \$43/day in years 1 to 5 = \$37,410Total: \$72,535					0	72,535		72,535	MAFETH
Contractual services-Individual	Project coordinator / PA Expert (20%) 230 days @ \$100 per day = \$23,000Environmental Legal Specialist (94%) 569 days @ \$32 per day = \$18,208.Gender & PWD Officer (8%) 100 days @ \$32 per day = \$3200.Communication and Knowledge Management Officer (11%) 135 days @ \$43 per day = \$5805.Conservateurs (5) - 250 days for 5 Conservateurs @ \$55 per day per Conservateur = \$68,750.Community mobilizers (5) 90 days for 5 community mobilizers @ \$43 per day per mobilizer = \$19,350.Ecoguards (60) 190 days for 60 ecoguards @ \$15 per day per ecoguard = \$171,000.GIS Officer (57%) 340 days @ \$32 per day = \$10,880.Sustainable Livelihoods Officer (4%) 50 days @ \$43 per day = \$2150.M&E/Safeguards Officer (8%) 90 days @ \$43 per day = \$3,870.Conservation Finance Officer. 4 years @ \$21,600 per year = \$86,400Total: \$412,613	412,613				412,613			412,613	MAFETH
Contractual services-Individual	Project coordinator / PA Expert (30%) 360 days @ \$100 per day = \$36,000.Administrative and financial assistant (100%) 60 months @ \$1000 per month = \$60,000.Watchmen (4) 1200 days @ \$11 per day for each watchman = \$52,800Total: \$148,800					0	148,800		148,800	MAFETH
Contractual services-Individual	Project coordinator/ PA Expert (17%) 190 days @ \$100 per day = \$19,000Environmental Legal Specialist (3%) 14 days @ \$32 per day = \$448.Gender & PWD Officer (3%) 40 days @ \$32 per day = \$1280.Communication and Knowledge Management Officer (6%) 70 days @ \$43 per day = \$3010.Conservateurs (5) (40%) 525 days for 5 Conservateurs and 20 days for 2 Conservateurs @ \$55 per day per person = \$146,575.Community mobilizers (5) (25%) 295 days for 5 community mobilizers @ \$43 per day per mobilizer = \$63,425.Ecoguards (60) 825 days for 60 ecoguards @ \$15 per day per ecoguard = \$742,500.GIS Officer. 260 days @ \$32 per day = \$8320.Sustainable Livelihoods Officer (2%) 20 days @ \$43 per day = \$860.M&E/Safeguards Officer (10%) 120 days @ \$43 per day = \$5160. Drivers (3) 1200 days @ \$13 per day for 3 drivers = \$46,800Speedboat drivers (2 part-time) 600 days @ \$9 per day x 2 drivers = \$10,800Total: \$1,048,178		1,048,178			1,048,178			1,048,178	MAFETH
Contractual services-Individual	Project coordinator/PA expert (20%) 250 days @ \$100 per day = \$25,000Environmental Legal Specialist (3%) 18 days @ \$32 per day = \$576.Gender & PWD Officer (6%) 70 days @ \$32 per day = \$2,240Communication and Knowledge Management Officer (14%) 170 days @ \$43 per day = \$7710.Conservateurs (5) (15%) 177 days for 5 Conservateurs @ \$55 per day = \$48,675.Community mobilizers (5) (45%) 495 days for 5 community mobilizers @ \$43 per day per mobilizer = \$106,425.Sustainable Livelihoods Officer (94%) 1130 days @ \$43 per day = \$48,590.M&E/Safeguards Officer (10%) 120 days @ \$43 per day = \$5,160.Total: \$243,976			243,976		243,976			243,976	MAFETH
Contractual services-Company	a) Service contract to a national NGO. Lump sum including local travel costs = \$2,600.b) Service contract to a national NGO. Lump sum including local travel costs = \$4,500.c) Service contract to the University of Comoros. Lump sum including local travel costs = \$50,000d) Service contract to a national NGO. Lump sum including local travel costs = \$50,000e) Service contract to a national consulting firm to carry out ESAs. Lump sum including local travel costs = \$32,000.Total: \$139,100		139,100			139,100			139,100	MAFETH
Contractual services-Company	National consulting firm contract @ \$25,000 = \$25,000	25,000				25,000			25,000	MAFETH
Contractual services-Company	Service contracts) Local consulting firm. 6 feasibility studies @ \$10,000 + a scoped ESIA @ \$18,000 = \$78,000.b) Local consulting firm. Intensive training @ \$100,000 per year for 1 year and close support \$25,000 per year for 3 years = \$175,000c) Local consulting firm. Fixed rate @ \$30,000 = \$30,000.d) Local consulting firm. Fixed rate @ \$10,000 = \$10,000.Total: \$293,000			293,000		293,000			293,000	MAFETH
International Consultants	a) International consultant MTR - Lump sum including travel costs = \$35,000b) International consultant for TE - Lump sum including travel costs = \$35,000Total: \$70,000					0	70,000		70,000	MAFETH
International Consultants	a) International Consultant. 30 days @ \$700 per day = \$21,000Total: \$21,000		21,000			21,000			21,000	MAFETH
International Consultants	a. Regional Consultant Expert in Environmental and Social Impact Assessments - 20 days @ \$300 per day = \$6,000b. International consultant Expert in conservation finance - 70 days @ \$700 per day = \$49,000c. Regional consultant Expert in environmental finance - 20 days @ \$300 per day = \$6,000Total: \$61,000	61,000				61,000			61,000	MAFETH
Local Consultants	a) National consultant - MTR - 30 days @ \$100/day = \$3000.b) National consultant TE - 30 days @ \$100/day = \$3000.Total: \$6,000					0	6,000		6,000	MAFETH
Local Consultants	a) National consultant Fauna biologist. 60 days @ \$100 per day = \$6,000.b) National consultants. Flora and fishery biologists (2). 100 days for each consultant @ \$100 per day = \$20,000c) National consultant Biology expert. 60 days @ \$100 per day = \$6,000d) National Translation Consultant. Fixed rate = \$1,000e) National consultant database expert. 33 days @ \$100 per day = \$3,300.Total: \$36,300		36,300			36,300			36,300	MAFETH
Local Consultants	a. Marine biologist - 60 days @ \$100 per day = \$6,000b. Flora biologist - 60 days @ \$100 per day = \$6,000c. Graphic designer - 10 days @ \$30 per day = \$300d. Tax specialist - 60 days @ \$100 = 6,000e. Translator 5 days @ \$40 per day = \$200.Total: \$18,500		18,500			18,500			18,500	MAFETH
Local Consultants	Graphic designer @ \$2000 (fixed rate) = \$2000				2,000	2,000			2,000	MAFETH
Local Consultants	National consultant to provide 30 trainings @ \$1000 per training = \$30,000.			30,000		30,000			30,000	MAFETH
Training, Workshops, Meetings	a) 18 one-day workshops for 40 people @ \$900 per workshop = \$16,200b) One-day workshop for 50 people @ \$2000 = \$2,000.c) Three (3) fairs per year @ \$2,000 in years 1, 3 and 5 = \$18,000Total: \$36,200			36,200		36,200			36,200	MAFETH
Training, Workshops, Meetings	a) 3-day workshop for 40 people @ \$1,500 per day = \$4,500.b) 3 one-day workshops for 50 people @ \$2000 = \$6,000c) 3 one-day workshops for 50 people @ \$2000 = \$6,000d) 56 one-day trainings for 30 people @ \$700 = \$39,200Total: \$55,700		55,700			55,700			55,700	MAFETH

<b>Training, Workshops, Meetings</b>	a) Five (5) annual contributions to Environment Day @ \$2,000 per year = \$10,000b) Five (5) annual organizations of the Protected Areas Day @ \$5,000 per year = \$25,000c) Thirty (30) tours in national parks for school classes @ \$500 per park visit = \$ 15,000d) Participation in the World Beach Cleanup Day for 3 beaches per year @ \$1,000 per beach in years 1 to 5 = \$ 15,000Total: \$65,000					65,000	65,000		65,000	MAFETH
<b>Training, Workshops, Meetings</b>	a) Workshop for 40 people @ 1500\$ = 1500\$b) 35 workshops for 30 people @ \$700 per workshop + 4 workshops for 50 people @ \$1000 = \$28,500.c) Six 1-day workshops for 30 people @ \$1500 = \$ 9000.d) Six half-day workshops @ \$700 = \$4,200 e) One-day workshop @ \$350 = \$350 f) Fifteen (15) local meetings for 50 people @ \$2,000 per workshop = \$30,000.g) One half-day workshop for 50 people @ \$1000 = \$1000h) Three (3) one-day workshops for 50 people @ \$2000 per workshop = \$6,000i) Thirty (30) days of FCC Resource Mobilization Task Force meetings @ \$500 each = \$15,000Total: \$95,550	95,550					95,550		95,550	MAFETH
<b>Training, Workshops, Meetings</b>	Three (3) project launching workshops @ \$5000 per workshop = \$15,000.						0	15,000		15,000 MAFETH
<b>Travel</b>	a) 8-day mission for Regional Consultant to Comoros + islands and 5-day mission to Moroni (2 regional air tickets @ \$700 + 1 air ticket to Ndzuani @ \$235 and Mwali @ \$200 + 13-day DSA @ \$226) = \$ 4,773.b) 5-day mission for the national GIS officer (air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 5-day DSA @ \$71) = \$790.c) 3-day mission to Moroni for 12 PA staff from Ndzuani and Mwali (air tickets for 8 people from Ndzuani @ \$235 and 4 people from Mwali @ \$200 + 3-day Moroni DSA @ \$95 for 12 people) = \$6,100.d) 4 inter-island missions for 2 national consultants for a total of 34 days (4 local air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 34-day DSAs @ \$71) x 2 = \$8,308.e) Provision for travel costs for EIA consultations @ \$600 = \$600.f) 12-day international mission (international air ticket @ \$1,500 + local air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 12-day DSA @ \$226 (Moroni) + 8-day DSA @ \$142 (region) = \$ 5,783.g) 4-day local mission for 3 people (local air tickets to Ndzuani @ \$235 and to Mwali @ \$200) + (4-day DSA @ \$142 for the DGEF Director) + (4-day DSA @ \$71 for 2 people) = \$2,441h) 2 5-day regional missions (regional air ticket @ \$700 + 5-day DSA @ \$300 + \$200 registration fees) x 2 events = \$4,800.Total: \$33,595		33,595				33,595		33,595	MAFETH
<b>Travel</b>	a) Fifteen (15) 10-day local missions for 1 project staff (air tickets to Mwali @ \$200 and Ndzuani @ \$235 + 10-day DSA @ \$71) x 15 = \$17,175b) Two local 5-day missions for 3 people in years 1 and 3 (air tickets to Mwali @ \$200 and Ndzuani @ \$235 + 5-day DSA @ \$71) x 3 people x 2 = \$4,740c) Two local 2-day missions in years 1 and 3 (air ticket to Ndzuani @ \$235 + 2-day DSA @ \$71) x 2 = \$754.Total: \$22,669					22,669	22,669		22,669	MAFETH
<b>Travel</b>	a) One 12-day local mission for 2 project staff (air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 12-day DSAs @ \$71) x 2 = \$2,574b) Two 15-day local missions for 1 consultant (air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 15-day DSA @ \$71) x 2 = \$ 3,000c) Two 24-day local missions for 2 project staff (air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 24-day DSA @ \$71) x 2 = 2 missions = \$8,556d) Two 12-day local missions for 2 people (air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 12-day DSA @ \$71) x 2 = 2 missions = \$ 5,148.e) One 20-day local mission for 1 project staff (air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 20-day DSA @ \$71) = \$ 1,855f) One 5-day mission for 2 project staff (air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 5-day DSA @ \$71) x 2 = \$1,580g) Three (3) 10-day local missions for 2 people (air tickets to Ndzuani @ \$235 and to Mwali @ \$200 + 10-day DSA @ \$71) x 2 people x 3 missions = \$6,870h) Provision for travel costs for EIA consultations @ \$600 = \$600.Total: \$30,183			30,183			30,183		30,183	MAFETH
<b>Travel</b>	a) One 6-day local mission per year in years 1 to 5 for 2 persons. [(Local air ticket to Mwali @ \$200 and to Ndzuani @ \$235, and 6-day local DSA @ \$71) x 2] x 5 = \$8,610.b) 10-day regional mission for 1 consultant to Comoros (regional airline ticket to Moroni @ \$700 and DSA @ \$226 for 10 days = \$2960.c) One 2-day mission to Moroni for 3 Conservateurs [2 Ndzuani tickets @ \$ 235 + 1 Mwali ticket @ \$ 200 + (2-day Moroni DSA @ \$ 95 x 3)] = \$ 1,240d) 10-day international mission to Comoros (International air ticket @ \$3000 + 10-day DSA @ \$226) = \$5,260.e) 10-day regional mission for 1 consultant to Comoros (Regional air ticket @ \$700 + 10-day DSA @ \$226 = \$2,960 f) 3-day mission for PC Ndzuani ticket @ \$235 and 3-day DSA @ \$71 = \$448g) 25-day international mission for 2 people (International air tickets @ \$3000 + 25-day DSA @ \$300) x 2 = \$ 21,000h) 5-day local mission for 3 people (Local air tickets to Mwali @ \$200 and to Ndzuani @ \$235 + 5-day local DSA @ \$71) x 3 = \$2,370i) 5-day local mission for PC (Local air tickets to Ndzuani @ \$235 and Mwali @ \$200 + 5-day DSA @ \$71) = \$790j) 6-day local mission for 2 people (Local air tickets to Mwali @ \$200 and to Ndzuani @ \$235 + 6-day local DSA @ \$71) x 2 = \$1722k) 6-day local mission for 2 people (Local air tickets to Mwali @ \$200 and to Ndzuani @ \$235 + 6-day local DSA @ \$71) x 2 = \$1722l) Provision for travel costs @ \$800 = \$800Total: \$49,882	49,882					49,882		49,882	MAFETH
<b>Travel</b>	a) One 8-day mission for the national consultant participation to the project MTR (air ticket to Mwali @ \$200 and Ndzuani @ \$235 + 8-day DSA @ \$71) = \$1003 b) One 8-day mission for the national consultant participation to the project TE (air ticket to Mwali @ \$200 and Ndzuani @ \$235 + 8-day DSA @ \$71) = \$1003.c) Twelve (12) 5-day missions for M&E/Safeguards Officer (air tickets to Mwali @ \$200 and to Ndzuani @ \$235 + 5-day DSA @ \$71) x 12 = \$9,480.Total: \$11,486					0	11,486		11,486	MAFETH
<b>Other Operating Costs</b>	Four (4) external audits @ \$7500 per audit = \$30,000						0	30,000		30,000 MAFETH
<b>Other Operating Costs</b>	Translation services for 7 reports @ \$2000 per report = \$14,000.						0	14,000		14,000 MAFETH
<b>Other Operating Costs</b>	a) 1000 copies @ \$1/copy = \$1000.b) Production of one spot @ \$1200 per spot = \$1200.c) 100 copies of technical sheets @ \$20/sheet = \$2000d) 1350 leaflet copies @ \$2 per copy + 14 banners @ \$70 per banner + 12 kakemonos @ \$400 each = \$8,480e) 6 videos @ \$3000 per video = \$18,000Total: \$30,680			30,680			30,680		30,680	MAFETH
<b>Other Operating Costs</b>	a) 300 boards @ \$16 per board = \$4,800b) Print material related to ESIA on species sustainable use plans: \$300Total \$5,100		5,100				5,100		5,100	MAFETH
<b>Other Operating Costs</b>	a) Printing 2000 leaflets @ \$2 per leaflet = \$4000. b) Printing 30 posters @ \$200 per poster = \$6000.c) Print material @ \$400 = \$400.Total: \$10,400	10,400					10,400		10,400	MAFETH
<b>Other Operating Costs</b>	Provision for print material related to ESIA @ \$300 in year 2 = \$300		300				300		300	MAFETH
<b>Other Operating Costs</b>	a) Prizes (7) @ \$200 per prize = \$1,400. Total: \$1,400		1,400				1,400		1,400	MAFETH
	<b>Project Total</b>	<b>715,570</b>	<b>1,479,298</b>	<b>935,646</b>	<b>513,304</b>	<b>3,643,818</b>	<b>189,021</b>	<b>191,640</b>	<b>4,024,479</b>	

## ANNEX F: (For NGI only) Termsheet

**Instructions.** Please submit a finalized termsheet in this section. The NGI Program Call for Proposals provided a template in Annex A of the Call for Proposals that can be used by the Agency. Agencies can use their own termsheets but must add sections on Currency Risk, Co-financing Ratio and Financial Additionality as defined in the template provided in Annex A of the Call for proposals. Termsheets submitted at CEO endorsement stage should include final terms and conditions of the financing.

## ANNEX G: (For NGI only) Reflows

**Instructions.** Please submit a reflows table as provided in Annex B of the NGI Program Call for Proposals and the Trustee excel sheet for reflows (as provided by the Secretariat

or the Trustee) in the Document Section of the CEO endorsement. The Agency is required to quantify any expected financial return/gains/interests earned on non-grant instruments that will be transferred to the GEF Trust Fund as noted in the Guidelines on the Project and Program Cycle Policy. Partner Agencies will be required to comply with the reflows procedures established in their respective Financial Procedures Agreement with the GEF Trustee. Agencies are welcomed to provide assumptions that explain expected financial reflow schedules.

**ANNEX H: (For NGI only) Agency Capacity to generate reflows**

Instructions. The GEF Agency submitting the CEO endorsement request is required to respond to any questions raised as part of the PIF review process that required clarifications on the Agency Capacity to manage reflows. This Annex seeks to demonstrate Agencies' capacity and eligibility to administer NGI resources as established in the Guidelines on the Project and Program Cycle Policy, GEF/C.52/Inf.06/Rev.01, June 9, 2017 (Annex 5).