

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

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10351

**Countries**

Comoros

**Project Name**

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

**Agencies**

UNDP

**Date received by PM**

11/18/2021

**Review completed by PM**

3/19/2022

**Program Manager**

Sarah Wyatt

**Focal Area**

Biodiversity

**Project Type**

FSP

**PIF**   
**CEO Endorsement**

**Part I ? Project Information**

**Focal area elements**

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

Secretariat Comment at CEO Endorsement Request  
12/14/2021

Yes.

Agency Response  
**Project description summary**

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

Secretariat Comment at CEO Endorsement Request  
12/14/2021

Yes.

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

Secretariat Comment at CEO Endorsement Request NA

Agency Response

**Co-financing**

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

Secretariat Comment at CEO Endorsement Request

12/14/2021

Yes.

Agency Response

**GEF Resource Availability**

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

Secretariat Comment at CEO Endorsement Request

12/14/2021

Yes.

Agency Response

**Project Preparation Grant**

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

Secretariat Comment at CEO Endorsement Request

12/14/2021

Yes.

Agency Response

**Core indicators**

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

Secretariat Comment at CEO Endorsement Request

12/14/2021

Yes.

Agency Response

**Part II ? Project Justification**

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

Secretariat Comment at CEO Endorsement Request

12/14/2021

Yes.

Agency Response

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

Secretariat Comment at CEO Endorsement Request

12/14/2021

Yes.

Agency Response

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

Secretariat Comment at PIF/Work Program Inclusion

3/6/2022

Yes.

12/20/2021

No, please address the following:

- 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 potential negative impacts be considered?

- 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.

#### Agency Response

UNDP 02/15/2022:

1.3.3:

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 (GEF-UNDP Project Document, Section IV. Results and Partnerships, Output 1.3, page 31, paragraph 99):

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 preliminary steps for the establishment of 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. Telecom has implemented and is operating 100 towers of which 23 are located within PAs and plans to build 39 additional ones, of which 15 will be located within PAs. Steps

to assess their impact and negotiate possible compensation measures have not yet been initiated.

3.5:

Thank you for your comment and advice. As stated in paragraph 160 (under Activity *3.1.1 Feasibility studies of value chain options based on ecosystem services in protected areas*), the value chain options were strategically selected based on the following criteria: *i*) products based on ecosystem goods and services provided by PAs, *ii*) accessible to local populations, *iii*) 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), *iv*) to which private sector actors are already committed and interested in engaging with local PA communities to expand the value chain, and *v*) 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 *3.1.1 Feasibility studies of value chain options based on ecosystem services in protected areas* 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: ?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)?. Also added in paragraph 181 (GEF-UNDP Project Document, Section IV. Results and Partnerships, Output 3.4, page 50) as part of the Activity *3.4.1 Support to businesses in designing their business model involving partnership with cooperatives in local communities*: ?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.?

The certification process is consistent with the STAP guidance to ensure that the main threats to eco-certification effectiveness are addressed:

(i) **Weak certification standards.** 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 *3.5.1 Development of a marketing strategy including a national certification and labeling system*, 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. Results and Partnerships, Output 3.5, page 51).

(ii) **Noncompliance with certification standards.** Under activity 3.5.1, the project provides for the setting up of an independent national certification committee to verify the conformity of the products and services of the community cooperatives with the certification criteria and for granting the certifications, to be re-evaluated annually. To ensure the transparency of the process, the committee members will get involved based on predefined terms of reference and mode of operation. The monitoring of performance indicators and annual assessment of the certification will ensure poorly performing producers are excluded (GEF-UNDP Project Document, Section IV. Results and Partnerships, Output 3.5, page 51).

(iii) **Limited participation, from supply-side or from demand-side.** Under activity 3.5.2 *Raising public awareness of the "Comoros National Parks Products" branding*, the project provides for broad awareness campaign to raise public interest (demand-side) for certified National Parks products and services and to capture the attention of potential actors from the private sector or in local communities (supply-side) and arouse their interest in getting involved and collaborating for the development of value chains based on ecosystems goods and services in National Parks (GEF-UNDP Project Document, Section IV. Results and Partnerships, Output 3.5, page 52).

(iv) **Adverse self-selection whereby actors already engaged in, or intending to engage in, innovative or environmentally friendly practices disproportionately participate in the program.** The following is added under activity 3.5.2, paragraphs 182 and 183 (GEF-UNDP Project Document, Section IV. Results and Partnerships, Output 3.5, page 52): "Awareness campaigns on the "National Parks of the Comoros" certification should capture the attention of potential actors and arouse their interest in getting involved in the development of value chains in collaboration with local communities and based on ecosystems goods and services in National Parks. Furthermore, through the collaboration with the Directorates of Environment, Fisheries and Tourism, the National Fishers Union and the Platform *Femmes Entreprenantes*, the project will be able to identify and reach all potential actors who may have an interest in getting involved in such value chains." To avoid the selection effect, all producers and actors will be subject to the same requirements, including those who have been pre-identified in the project document.

**Indicators.** The project results and monitoring framework already includes outcome indicators (for outcome 3), that are built into the project design as recommended, to monitor and assess the socio-economic and environmental impacts of the development of value chains, including certification efforts. Indicator 9 monitors the number of beneficiaries within local communities in national parks who report at least a 25% increase in baseline incomes from adoption of sustainable livelihood options. Indicator 10 monitors the condition of resources that are subject to sustainable development by local communities in project intervention sites within PAs. However, these indicators do not enable the assessment of the effectiveness of the certification itself. The most relevant threat to effectiveness of the certification that is not assessed through the indicators 9 and 10 is the adverse self-selection, "*whereby actors already engaged in, or intending to engage in, innovative or environmentally-friendly practices disproportionately participate in the project*". Therefore, to further align the project with STAP's guidelines for environmental certification, the indicator 11 is modified as follows to enable the threat of adverse self-selection to be assessed through the separate monitoring and assessment of new partnerships including those with potential partners that have been identified during the project preparation and those whose interest will be raised through awareness and information campaigns conducted as part of the project:

*Indicator 11:* Number of partnerships 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.

The changes were made in the following documents and sections:

ProDoc Section V - Project Results Framework (p. 72)

ProDoc Annex 4. Monitoring Plan (p.144)

CEO ER PART IV: ANNEXES - Annex A: Project Results Framework (p.67)

CEO ER PART I: PROJECT INFORMATION ? Section B: Project Description Summary (p.3)

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

Secretariat Comment at CEO Endorsement Request

12/20/2021

Yes.

Agency Response

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

Secretariat Comment at CEO Endorsement Request

12/21/2021

Yes.

Agency Response

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

Secretariat Comment at CEO Endorsement Request

12/21/2021

Yes.

Agency Response

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

Secretariat Comment at CEO Endorsement Request

12/17/2021

Yes.

Agency Response



## **Project Map and Coordinates**

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

Secretariat Comment at CEO Endorsement Request

3/6/2022

Yes.

12/14/2021

No, please include a map in the Portal entry.

## **Agency Response**

UNDP 02/15/2022:

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.

GEF Portal: Annex D: Project Map(s) and Coordinates

CEO ER Annex E: Project Maps and Coordinates (page 104)

ProDoc Annex 2. Project maps and Geospatial Coordinates of project sites Figure 1. Overview of the network of national parks of the Comoros on the islands of Ngazidja, Mwali and Ndzuanani. (p.112)

## **Child Project**

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

Secretariat Comment at CEO Endorsement Request

NA

## **Agency Response**

**Stakeholders**

**Does the project include detailed report on stakeholders engaged during the design phase?**

**Is there an adequate stakeholder engagement plan or equivalent documentation for the**

**implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?**

Secretariat Comment at CEO Endorsement Request

12/20/2021

Yes.

Agency Response

**Gender Equality and Women's Empowerment**

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

Secretariat Comment at CEO Endorsement Request

12/20/2021

Yes.

Agency Response

**Private Sector Engagement**

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

Secretariat Comment at CEO Endorsement Request

12/20/2021

Yes.

Agency Response

**Risks to Achieving Project Objectives**

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

Secretariat Comment at CEO Endorsement Request

12/20/2021

Yes.

Agency Response

**Coordination**

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

Secretariat Comment at CEO Endorsement Request

3/9/2022

We note that UNDP will be providing limited execution support for this project (amounting to maximum of about 6%) while investing significant UNDP country office resources to support capacity building.

This has been approved by the PM and GPU Manager.

12/20/2021

Yes.

Agency Response

**Consistency with National Priorities**

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

Secretariat Comment at CEO Endorsement Request

12/20/2021

Yes.

Agency Response  
**Knowledge Management**

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

Secretariat Comment at CEO Endorsement Request  
12/20/2021

Yes.

Agency Response  
**Environmental and Social Safeguard (ESS)**

**Are environmental and social risks, impacts and management measures adequately documented at this stage and consistent with requirements set out in SD/PL/03?**

Secretariat Comment at CEO Endorsement Request  
12/20/2021

Yes.

Agency Response  
**Monitoring and Evaluation**

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

Secretariat Comment at CEO Endorsement Request  
12/20/2021

Yes.

Agency Response  
**Benefits**

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

Secretariat Comment at CEO Endorsement Request  
12/20/2021

Yes.

Agency Response  
**Annexes**

**Are all the required annexes attached and adequately responded to?**

Secretariat Comment at CEO Endorsement Request  
4/7/2022

Yes, thank you for the revisions and new LOE.

3/19/2022

No, the following issues remain:

- The LOE does not match the amount of the project - \$4,516,305 - but rather is \$10,000 short of that number.

- 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.

- 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 may be for the project's components, M&E personnel / activities, office supplies, etc.). This is not a new request: we have consistently requested the same to all projects. Please amend (we can talk we the Agency as needed).

- 
- 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 documents' tab and in ProDoc).

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.

•  
3/9/2022

No, please address the following:

- Minor amendment: Please submit the forms for a minor amendment to increase the budget.

- Co-financing classifications:

? General Directorate of Environment and Forests

o Grant: change ?Grant? to ?Public Investment?

o In-kind: change ?Investment Mobilized? to ?Recurrent expenditures?

? National Directorate of Agriculture and Livestock Strategy

o Grant: change ?Grant? to ?Public Investment?

? National Directorate of Tourism and Hospitality: change ?Grant? to ?Public Investment?

? National Directorate of Waste Management: change ?Grant? to ?Public Investment?

? 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?)

o Outcomes of these grant projects serve as ?in-kind? activities to support the GEF project. (?In-kind? definition: contributions in the form of goods or services other than money, including but not limited to salaries and wages, office space, and utilities. Source: GEF Co-financing Guidelines)

? 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?

? Mitsamiouli Commune: change ?Civil Society Organization? to ?Recipient Country Gov??. Change ?Grant? to ?Public Investment?.

- Core Indicators:

In Annex A ?Project Results Framework?:

- (i) Two protected area WDPA ID remains N.A under CI 2.2 Please add those, as these are mandatory at CEO Endorsement stage.
- (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.

- 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&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.

- On the Status of Utilization of Project Preparation Grant (PPG): this section in Portal asks for "detailed funding amount of the PPG activities financing status". However, there is no detailed information per activities as shown in the table below ? please amend.

## Agency Response

### **UNDP 03/15/2022:**

- Minor amendment: The revised OFP letter will be resubmitted with the project package to confirm the slightly increased budget. The GEF Focal Point had requested UNDP to add the USD 16,305 left in its STAR for GEF-7 to this project at endorsement.

#### Co-financing classifications:

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 Women's Sustainable Development and Food Security Platform. These changes were made in the Table 5 on Co-financing and contributions to the project, pages 84-88, of the GEF-UNDP Project Document, Section VIII on Financial Planning and Management, and in the Section C ? Confirmed sources of co-financing for the project, p.4, of the CEO Endorsement Request, Part I on Project Information.

#### 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".

#### Mitsamiouli Commune:

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).

#### Protected area WDPA ID:

Annex F: GEF 7 Core Indicator Worksheet of the CEO ER: the WDPA ID has been added for the Shissiwani National Park. No other occurrence of a missing WDPA ID was found.

#### GEF Core Indicator 3:

Annex F: GEF 7 Core Indicator Worksheet of the CEO ER: The CEO Endorsement level targets (total area) have been added to the Project Results Framework.

#### Budget:

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).

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.

#### UNDP - 04/07/2022

LOE:

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.

Co-financing:

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).

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
Private Sector	Eco-Massiva	In-kind	Recurrent expenditures	300,000
Civil Society Organization	House of Civil Society Organizations	In-kind	Recurrent expenditures	700,000
Civil Society Organization	UMAMA Association	In-kind	Recurrent expenditures	400,000
Civil Society Organization	Regional Association for Forest Management and Development	In-kind	Recurrent expenditures	300,000
Civil Society Organization	Association for the Protection of the Gombessa	In-kind	Recurrent expenditures	200,000
Civil Society Organization	MAEECHA NGO	In-kind	Recurrent expenditures	820,000
Civil Society Organization	Ulanga Ngazidja	In-kind	Recurrent expenditures	300,000
Civil Society Organization	Women's Sustainable Development and Food Security Platform	In-kind	Recurrent expenditures	170,000

Recipient Country Government	Mitsamiouli Commune	Public Investment	Recurrent expenditures	570,000
<b>Total Co-financing</b>				<b>25,854,156</b>

**Budget:**

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.

**Budget Note on co-financing of project staff salaries:**

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?.

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

**Status of Utilization of Project Preparation Grant (PPG):**

The following information has been integrated in the Annex C: Status of Utilization of Project Preparation Grant of the CEO Endorsement Request.

PPG Grant Approved at PIF: 100,000
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<i>Project Preparation Activities Implemented</i>	<i>GETF/LDCF/SCCF Amount (\$)</i>		
	<i>Budgeted Amount</i>	<i>Amount Spent Todate</i>	<i>Amount Committed</i>
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>	100,000	98,8467	1,153

**Project Results Framework**

Secretariat Comment at CEO Endorsement Request

12/21/2021

Yes.

Agency Response

**GEF Secretariat comments**

Secretariat Comment at CEO Endorsement Request

12/21/2021

Yes.

Agency Response

**Council comments**

Secretariat Comment at CEO Endorsement Request

12/21/2021

Yes.

Agency Response  
**STAP comments**

Secretariat Comment at CEO Endorsement Request  
12/21/2021

Yes.

Agency Response  
**Convention Secretariat comments**

Secretariat Comment at CEO Endorsement Request NA

Agency Response  
**Other Agencies comments**

Secretariat Comment at CEO Endorsement Request NA

Agency Response  
**CSOs comments**

Secretariat Comment at CEO Endorsement Request NA

Agency Response  
**Status of PPG utilization**

Secretariat Comment at CEO Endorsement Request  
12/21/2021

Yes.

Agency Response  
**Project maps and coordinates**

Secretariat Comment at CEO Endorsement Request  
12/21/2021

Yes, though it would be good to have more legible maps in the Portal.

Agency Response

UNDP 02/15/2022:

Project maps uploaded to GEF Portal: Annex D: Project Map(s) and Coordinates

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

Secretariat Comment at CEO Endorsement Request

NA

Agency Response

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

Secretariat Comment at CEO Endorsement Request NA

Agency Response

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

Secretariat Comment at CEO Endorsement Request NA

Agency Response

**GEFSEC DECISION**

**RECOMMENDATION**

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

Secretariat Comment at CEO Endorsement Request

4/7/2022

Yes.

3/21/2022

No, please address the remaining issues.

3/9/2022

No, please address the issues raised in the annex question.

12/21/2021

No, not at this time. Thank you for the submission and please address the few issues raised.

**Review Dates**

	<b>Secretariat Comment at CEO Endorsement</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	<b>12/21/2021</b>	
<b>Additional Review (as necessary)</b>	<b>3/6/2022</b>	
<b>Additional Review (as necessary)</b>	<b>3/9/2022</b>	
<b>Additional Review (as necessary)</b>	<b>3/21/2022</b>	
<b>Additional Review (as necessary)</b>	<b>4/7/2022</b>	

**CEO Recommendation**

**Brief reasoning for CEO Recommendations**