



# Biodiversity Conservation through Nature-based Solutions as Pillars of the Blue & Green Economy in the Union of Comoros.

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

11261

**Countries**

Comoros

**Project Name**

Biodiversity Conservation through Nature-based Solutions as Pillars of the Blue & Green Economy in the Union of Comoros.

**Agencies**

UNDP

**Date received by PM**

6/27/2024

**Review completed by PM**

11/15/2024

**Program Manager**

Celine Augereau ep Coisy

**Focal Area**

Multi Focal Area

**Project Type**

FSP

**CEO**

**Part I - General Project Information**

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

Secretariat comment at CEO Endorsement Request

9/16/2024

Yes.

Agency Response

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

Secretariat comment at CEO Endorsement Request

9/16/2024

Yes.

Agency Response

**2. Project Summary.**

**a) Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected outcomes?**

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

**c) [If a child project under a program] Does the project summary include adequate and substantive link with the parent program goal and approach?**

Secretariat comment at CEO Endorsement Request

9/16/2024

No.

a) The summary would gain to be more concise and clearer. Furthermore, the component given in the summary are not consistent with those in the description, notably Component 1 and 2. Please clarify. The component 1 does not seem very ambitious by only enhance understanding of ESV through NCA and ESV studies. It would be clearer to say directly: will integrate the ES values in national and sectorial accounting through NCA and ESV diagnostic studies.

b) There is no link included to the parent program in the project summary. Please complete this by explaining how this child project is consistent with the main program. Given later comments, this will need to be revised with the rest of the project.

November 11th 2024

a) Cleared

b) Not Cleared.

- There is no mention or explicit indication in the Summary that the project is a part of the BGI IP and the strategic contribution of this project to the program. Please include.

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- The BGI IP is an integrated program and we recommend that narrative on biodiversity conservation is balanced with a focus on ecosystems management in general as well as other areas such as land rehabilitation, climate change mitigation/adaptation. The BGI IP program is meant to impact GEBS across the Core Indicators and multiple MEAs, not only biodiversity and child projects are expected to be consistent with this. Please ensure this is reflected throughout the document.

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- November 14th 2024

- b) Cleared

#### Agency Response

Agency Response, November 5, 2024

a) Thank you for your comment. The Project Summary has been modified accordingly.

b) The Project Summary has been modified and links made with the parent program in the Project Summary and throughout the project.

Agency Response, November 13, 2024

Thank you for this comment

- A sentence has been added to project summary: "This project is part of and will contribute to the BGI integrated Programme which objective is to facilitate nature-positive development and reduce ecosystem degradation in SIDS by valuing nature and applying NbS with specific application to the food, tourism, and urban sectors."

- We have noted your comment, and those aspects have been made clearer and enhanced throughout the CEO ER.

### 3. Project Description Overview

- a) Is the project objective statement concise, clear and measurable?
- b) [If a child project under a program] Is there a project Theory of Change that is aligned and consistent with the overall program goal and approach?
- c) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?
- d) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
- e) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
- f) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

#### Secretariat comment at CEO Endorsement Request

9/16/2024

No.

a. It would be good to be more specific here as it covers most everything. It seems like this project might be better understood or framed as something about positioning protected areas as drivers of sustainable development for Comoros - both in the understanding of the decision makers and on-the-ground.

c. Overall, the activities of the project feel both a bit disjointed and trying to cover too many different topics.

Organization - The components and the outcomes seem to be the same things while some of the outputs read more as outcomes. We would often expect multiple outcomes per component. It seems like there would be a benefit to providing a bit more detail at the output level in terms of explaining and organizing the project.

d. The gender dimension is considering only into knowledge management and monitoring and assessment of the project. But in that component, the gender mainstreaming is not included in the title while it is in the description. Please, try to find a better way to formulate the title of the component including the gender mainstreaming. It is also taken in account in output 1.1.2

Please, describe in all the other components, outcomes and outputs how the women are included in the process of decision making, in the incentivizing process, in the implementation of NBS.

e.e. No. The contribution of the GEF to the PMC is 4,67% while agency is 0,12%. there is not proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 5%, for a co-financing of \$98,543,790 the expected contribution to PMC must be around \$4,927,190 instead of

\$120,000 (which is 0.1%). As the costs associated with the project management must be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution and the co-financing contribution must be proportional, which means that the GEF contribution to PMC might be decreased and the co-financing contribution to PMC might be increased to reach a similar level. Please ask the Agency to amend either by increasing the co-financing portion and/or by reducing the GEF portion. A more definitive estimation of PMC will be presented and adjusted at CEO Endorsement stage.

f. Yes.

November 11th 2024

a) Cleared

c) Cleared

d) Cleared

e) Cleared

#### Agency Response

**Agency Response, November 5, 2024**

a. The project objective has been adjusted as follows: ?Using protected areas as drivers of sustainable development in the Union of Comoros; catalyzing the transformation of the food and tourism sectors as pillars of the Blue & Green Economy through nature positive action, decision-making and investments.?

c. Thank you for your valuable comments.

1- Outcomes and outputs have been completely reorganized and detailed. Please also see Project Overview Table for the newly worded Outputs. We now have:

**Component 1:** Mainstreaming nature-based solutions into development and planning processes across the tourism and food economic sectors through improved governance, budgetary and financial action

? **Outcome 1.1** Natural capital is compiled and integrated into public policy information systems and political processes to better inform nature-positive decision-making

? **Outcome 1.2** Governance systems improved at the national and sub-national level for nature-positive NbS and gender-responsive planning in the tourism and food sectors (agroforestry and fisheries)

? **Outcome 1.3.** Strengthened and coherent enabling environment that incentivizes private sector investment in scalable sustainable NbS across the tourism and food sectors, which supports the growth of the Blue and Green Economy.

**Component 2:** Implementation of scaled and sustainable NbS in key ecosystems in terrestrial and marine PAs *supported* by private investment in the tourism and food sectors

? **Outcome 2.1** *Improved capacities of local communities and businesses of the targeted protected areas to monitor NbS activities, expand market opportunities to access private sector investment, and implement scaled sustainable Nature-based Solutions.*

? **Outcome 2.2** *Nature based solutions scaled and implemented in key ecosystems supporting the tourism and food systems through inclusive, gender sensitive and multi-sectoral approaches.*

**Component 3:** Inclusive and Gender-Sensitive Knowledge Management and Partnership Building to Advance Nature-Based Solutions at Local, National, Regional, and Global Levels.

? **Outcome 3.1** *Technical knowledge and lessons learned from the project's experiences are compiled, evaluated, and translated into knowledge products that are inclusive and gender sensitive.*

? **Outcome 3.2** *Positive synergies and inclusive partnerships are built with existing regional and global partners/actors, to drive collaboration and leverage additional resources to invest at scale on NbS in Comoros*

**Component 4:** Project Monitoring and Evaluation (M&E)

? **Outcome 4.1.** *Integrated, gender-sensitive and inclusive project M&E is implemented*

2- We have also added and adjusted the text in the descriptions of Component 1 ? Outcomes 1.1., 1.2 and 1.3 and Component 2 - Outcomes 2.1 and 2.2. to ensure the links and logic between the outputs/outcomes are clearer. Please see Project Description section for the detailed text.

d. Thank you for bringing this to our attention, Component 3 title adjusted as: ?Inclusive and Gender-Sensitive Knowledge Management and Partnership Building to Advance Nature-Based Solutions at Local, National, Regional, and Global Levels?

Gender aspects have been added and mainstreamed throughout the project description, including the project's components, outcomes and outputs.

e. Some UNDP and AFD co-finance has been moved to PMC, which now is at 5% of the total co-finance amount.

#### 4. Project Outline

##### A. Project Rationale

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

Secretariat comment at CEO Endorsement Request

9/18/2024

No.

a. The current situation is well described, and drivers of environmental degradation too. The importance of the hotspot is specified but please provide details about the contribution of the target areas of the projects to this ecological importance. In particular, is the project to take place in representative ecosystems of the Comoros, in areas containing threatened species. Does the target areas of the project are in an ecosystems or represent ecosystems/communities rare at the global scale, are they habitats representative of the country ?

b) No. The way the stakeholders will contribute to GEBs is not clear, please complete. In particular, please, describe how the project will contribute to the conservation of globally significant biodiversity in the areas of the projects and how the project will favorize the sustainable use of globally significant biodiversity. Describe also in the governance part the role of each stakeholder (we have just a list but not their role). It could be interesting to have the role of CSO role in decision making. The Stakeholder Engagement Plan could elaborate further on the different stakeholder's role and responsibilities related to the specific project components and outputs.

November 11th 2024

a) Not Cleared.

•We note Annex 3 has significant information, however the project rationale linking the targeted protected areas to the sectors of focus is missing from the portal submission. Beyond their biodiversity importance, what is the link of the PAs to the targeted sectors? How significant is the level of degradation that is caused by these sectors and how important are they for the ecosystems services they provide to these sectors? This will help to strengthen the logic for the project. Please incorporate in summary these aspects.

b) Cleared

•November 14th 2024

•a) Cleared

## Agency Response

### Agency Response, November 5, 2024

a. Thank you for this comment. This information is provided in Annex E. Text has been adjusted to provide more detail to address the comment.

b. Thank you for this comment. Please note that the following changes have been made:  
1- Text has been added in ?stakeholders? section on the project contribution to increasing leadership and decision-making opportunities for people living in and depending upon protected areas.  
GEB section: Text has been added to further describes the project?s contributions to GEBs and globally significant BD  
2- Governance section: role of each stakeholder has been added in the table form

### Agency Response, November 13, 2024

Thank you. The text adjusted in Section A/Current Situation with the following added for clarification: ?Natural resources are critical for supporting the country's economy and the livelihoods of the population, in particular in the 6 NPs, which include a large proportion of the country?s coastal areas, fishing zones, and (agro)forests, all facing important degradations, which directly impacts the food (fisheries and agriculture) sector and tourism potential of the country. Almost 40% of the national GDP is generated based on land, sea, or natural inputs[1]. Focusing on the 6 NPs ? which are the most critical zones of the country for ecosystem services ? to scale-up NbS, has the potential to embark the entire economy into a more sustainable pathway. ?

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[1] The World Bank, 2023

## 5 B. Project Description

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

b) [If a child project under a program] Is the Theory of change aligned with and consistent with the overall program goal and approach?



- c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region? [If a child project under a program] Does the description include how the alternative aligns with and contributes to the overall program goal and approach?
- d) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?
- e) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?
- f) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?
- g) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?
- h) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?
- i) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?
- j) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?
- k) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?
- l) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?
- m) Transformation and/or innovation: Is the project going to be transformative or innovative? [If a child project under an integrated program] Are the specific levers of transformation identified and described? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

9/18/2024

No.

- a. This needs to be revisited when the project is revised.
- b. Yes.
- c. Yes.
- d.

Component 1 - Overall, component 1 seems to focus heavily on report development and analyses without the support for implementation and incorporation into decision making that is needed. As an

example, a private sector plan needs resources to support its implementation or it will just sit on a shelf.

NCA - Is the project setting up a national natural capital accounting framework? Note we see Natural Capital Accounting as a more long term process to help countries to determine and monitor their natural capital stocks over a long period of time and account for them in the national statistical framework. A key feature of ecosystem service valuation is to provide monetary and non-monetary values of ecosystems and ecosystems services which can then be used for policy decision making. Please refer to this helpful factsheet and confirm if the project is engaging in NCA or ESV or both. <https://naturalcapitalproject.stanford.edu/sites/g/files/sbiybj25256/files/media/file/3ps-ncaa-explainer-english.pdf>

It's unclear if NCA would be effective in changing decision making in the context of Comoros (or most any country).

1.1.1 - This seems to incorporate too wide a range of activities. The output says it's on building capacity, which would be much more limited than the activities described - this would go to the issue of this being an outcome more than an output. Please revise.

1.1.2 - In the case of this project, it seems as though NbS is being used as a catch-all term here rather than understanding that NbS is about shifting the understanding of nature.

Specific to this project, it does not appear that waste management as described is a NbS and, therefore, not eligible for funding.

NbS - Logic and framing - The objective and theory of change for this program is that there is a need for a fundamental shift in the understanding of the role of nature to see it as the foundation of human wellbeing. While NbS is a broad concept and many things can fall within it, it is also meant to flip around society's understanding of the importance of nature. The idea is to make nature conservation and environmentally friendly practices understood through the lens of human wellbeing.

Therefore, with each NbS it is important to articulate the societal problem(s) that the activity is seeking to address. It is important that society is able to internalize this logic even if the on-the-ground activities are the same or similar to the types of work done under previous projects. The SDGs can provide a useful framework for the various societal problems that nature is the solutions to. The idea is also to get at the driver or root of problems rather than dealing with the symptoms and having societies thinking holistically about the challenges they face.

As an example, a project could focus on good management of a marine protected area (mangroves, coral reefs, etc). The project activities could be traditional protected area management activities such as a management plan, equipping and training rangers, sustainable fisheries planning, and/or establishing long term financing through entry fee system for tourists. A BGI or any NbS project would need to go a step beyond this to get at the 'why?' of the work being done. For example, coastal protection, storm water management, long term fisheries food/job security requiring healthy

mangrove nurseries, jobs/income from tourism (which is attracted by healthy reefs and the mangrove nurseries to support them), etc.

Another example could be managing storm water in urban areas or water quality, one possibility would be to build extensive gray infrastructure and water treatment (not an NbS). There are various possible NbS to address this issue: working with farmers upstream to implement practices that reduce the speed of run off and/or reduce the use of chemical inputs; protecting or restoring wetlands; incorporating green permeable throughout urban areas, removing invasive plants and restoring forests that have deeper root systems and result in better water infiltration and less woody debris clogging water management systems (this is a real example from Samoa). Again, many of the on-the-ground activities would be the same or similar to previous GEF and other projects; however, the 'why' is important for understanding the interconnectivity of challenges, the holistic value of working with nature, and how it can be integrated into urban and spatial plans and policies.

Internalizing this and demonstrating this logic also should provide needed reinforcement of the work of incorporating the value of nature in decision-making of component 1.

Please define and explain SESA for this project.

1.1.3 - This does not appear to fit within 1.1. What is meant by capacity?

Component 2 - Please review the comments above about NbS and revise accordingly.

2.1.2 - It's hard to see the common thread and organization in this output. There are such a wide variety of activities, NbS, and sectors covered. We expected projects to work with one or maybe two sectors when there was a logical relationship.

"Strengthen small, basic communal infrastructures that are key to the success of NbS" This is a confusing statement. This is not a given - please explain.

Eco-tourism - While certainly eco-tourism and good protected area management can be NbS, it's important that the project and proponents don't just jump into these activities without making the logic clear to the communities and decision makers. As an example, from an assessment in component 1 there could be information about mangroves as important for storm protection and fish nursery. We know that a protected area is a way to preserve those values and that tourism can be a way to provide livelihoods on top of that. This framing of why a PA is being implemented and managed is important and makes it a NbS.

Bio-gas - This isn't really a NbS. Will there be a plan to generate fertilizer that might replace agrochemicals?

Agroforestry - It's unclear how the cosmetics example is an NbS.

Overall, we would like to encourage the project to focus. This reads more as a menu of options than an organized project. We are concerned that implementation will struggle with too many things to keep track of.

- e. No, there is no description about the incremental cost.
- i. There is a list, but please describe main activities of each stakeholder.
- j. The gender mainstreaming is insufficient in the description of each component and outcomes, output. We would like to ask the Agency to ensure that the RF includes gender-sensitive indicators that capture the indicated gender-responsive measures in the project components, as developed in the Gender Action Plan (e.g., number of gender-responsive plans, number of women accessing NbS investments instruments, number of women-led Nbs Projects, number of women and women's organizations involved in decision making processes).
- k. Activities are described more or less, but the dedicated budget seems very low.
- l. It would be helpful for this to be more clear and what the project will seek to address.

November 11th 2024

a. Cleared

d. Not cleared :

Component 2

•We note a series of NBS types that will be applied, if available please share specific NBS interventions that will be undertaken which could tap into the NBSA and Technical Assistance Facility.

e. Cleared

i. Not cleared : please describe the role of the ANPN in the project.

j. Cleared

k. Cleared

l. Cleared

November 14th 2024

d. Cleared

i. Cleared

## Agency Response

### Agency Response, November 5, 2024

a. The Theory of Change has been modified in response to GEFSec comment 3c. The ToC narrative and schematic have been adapted to better describe the project logic, causal pathways, and how the proposed solutions are provide a robust approach. Key underlying assumptions are included.

**Component 1** has been restructured in 3 different outcomes to clarify its structure and contents. As such it has also addressed some of the comments made. Some outputs are made into outcomes as suggested (1.1.1) with more clearly defined outputs and activities, clarifying how NCA will mobilize stakeholders and influence decision making processes. Also, for the use of the NbS terminology. The systemic interlinkages are more clearly explained in the text now, with better definitions of the NbS that support these interlinkages. This includes for example the NbS surrounding organic waste management, which ties activities in the tourism and agricultural sectors in, with the improvement of environmental solutions through waste collection, composting and enhanced use of biofertilizers. Such activities can also decrease water pollution in nearby waterways and oceans downstream, thereby improving fish species? environments.

The overall structure is now:

Outcome 1.1. focuses on Natural capital compilation and integration into public policy information systems and political processes to better inform nature-positive decision-making, with the aim to help policymakers prioritize conservation efforts and make informed decisions about land use, conservation, and sustainable development

Outcome 1.2. focuses on governance systems to support the updating of existing policies or the elaboration of new policies and plans, reinforcing the capacity of national and local leaders to integrate NbS and gender-responsive planning in their strategies

Outcome 1.3. will establish a strengthened and coherent enabling environment that incentivizes private sector investment in scalable sustainable NbS across the tourism and food sectors, which supports the growth of the Blue and Green Economy.

It will ensure the integration of nature?s value and ecosystems into domestic expenditure, including public and private investments and lending policies related to the food and tourism sectors, which are essential elements to prevent ecosystem degradation

Overall, the why has been strongly emphasized in the text tying the activities across the sectors together, showing the overall systemic value added. Not only to the environment, but also the community benefits that will be brought about from the NbS.

Please note that SESA is defined in Outcomes 1.2 and 1.3.

Thank you for your thoughtful comments. Please note the changes below that have been made to Component 2.

**Component 2** has been entirely restructured and now includes 2 outcomes as indicated below:

**Outcome 2.1.** Improved capacities of local communities and businesses of the targeted protected areas to monitor NbS activities, expand market opportunities to access private sector investment, and implement scaled sustainable Nature-based Solutions.

**Outcome 2.2.** Nature-based Solutions scaled and implemented in key ecosystems supporting the tourism and food economic sectors through inclusive, gender-sensitive, and multisectoral approaches.

The focus on the food and tourism economic sectors will center around the systematic linkages between sustainable agricultural practices, restoration of land and marine ecosystems, and improved organic waste management and usage and resulting benefits and impacts for communities and local economies. By implementing NbS related to agroforestry, reforestation, and coastal ecosystem restoration, the project aims to strengthen the resilience of both the food and tourism sectors. Agroforestry techniques, such as planting trees to restore soil fertility and reduce coastal erosion, will enhance agricultural productivity while promoting more sustainable farming methods and generating more attractive areas for coastal tourism. Simultaneously, the restoration of critical marine areas, such as mangroves, coral reefs, and beaches, will not only protect biodiversity but also support local fisheries and eco-tourism, key contributors to the economy. Improved organic waste management practices, including the conversion of agricultural and tourism organic waste into biogas and bio manure, can produce natural fertilizers to nourish both land-based and coastal ecosystems, further supporting food systems and enhancing environmental restoration.

These activities will foster long-term economic opportunities while improving livelihoods by linking sustainable ecosystem management to community well-being. Restored ecosystems, both terrestrial and marine, will become more resilient to environmental challenges, offering reliable sources of food and eco-tourism attractions. By managing organic waste efficiently, such as using biogas byproducts as fertilizers, the project creates a circular economy where ecological restoration is supported by sustainable resource use. Agroforestry in upland farming areas will stabilize soils, preventing erosion that harms coastal waters and marine life, while reforestation in degraded areas like Grand Comore will protect freshwater springs and reduce sedimentation in lagoons. Through this integrated approach, the project ensures that conservation efforts not only protect the environment but also generate sustainable, locally-driven economic benefits that enhance food security and tourism opportunities.

d. Thank you for this comment. Incremental cost reasoning section has been added in Section A.

i. A table has been added, as per above comment 4(b)2.

j. Thank you for this comment. Gender has been mainstreamed in the revised text of each component, including the Project Overview Table and project indicators.

k. The allocated budget for knowledge sharing and communication activities now totals \$783,000.

Activities are now organized in 2 outcomes:

**Outcome 3.1:** Technical knowledge and lessons learned from the project's experiences are compiled, evaluated, and translated into knowledge products that are inclusive and gender sensitive

**Outcome 3.2:** Positive synergies and inclusive partnerships are built with existing regional and global partners/actors, to drive collaboration and leverage additional resources to invest at scale on NbS in Comoros

l. Aspects of policy coherence have been reinforced through the project description, in particular in Component 1.

#### **Agency Response, November 13, 2024**

a. Thank you for this comment. NbS interventions in Component 2 will tap into the Global Coordination Project's Nature-based Solutions (NbS) Accelerator and Technical Assistance Facility. The Project notes the importance of the the NbS Accelerator, which will be supporting the supply of high-quality nature-integrated projects, including supporting of information availability and exchange. Please see references to NbS Accelerator and the Technical Facility in Component 2, including but not limited to for the collection of local and regional data for the feasibility assessment and market analysis to inform blue and green value chains (output 2.1.1), empowering communities and local businesses to access private sector finance (output 2.2.2), regional experience in developing circular organic waste management practices and its conversion to usable bio-fertilizers (output 2.2.1) and development of nature-positive sustainable eco-tourism and its business management.

i. Specific role of ANPN added: "ANPN will play a key role in supporting NPs' management units - through capacity building and coordination - to implement ecosystem restoration and management activities, in close coordination with private sector actors, to scale up proposed NbS in the tourism and food sectors"

#### **5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project**

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

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

- c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).
- d) [If a child project under an integrated program] Does the framework for coordination and collaboration demonstrate consistency with overall ambition of the program for transformative change?

Secretariat comment at CEO Endorsement Request

9/18/2024

No.

b. As the institutional arrangements for this project is full NIM without any execution support from UNDP, please remove the reference such execution services under the Institutional arrangement section in Portal and in the Prodoc.

November 11th 2024

b. Cleared

Agency Response

**Agency Response, November 5, 2024**

**Noted. References to execution services have been removed.**

### 5.3 Core indicators

- a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)? [If a child project under a program] Is the choice of core indicators consistent with those prioritized under the parent program?
- b) Are the project's targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) /adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

9/18/2024

No, please make sure that indicators are included in the component table at the beginning.

Under core indicator 1.2 and 2.2, please provide the METT score at the CEO endorsement. Or please explain the plan to include this information at the first PIR.

November 11th 2024



Not Cleared : Under core indicator 1.2 and 2.2, please provide the METT score at the CEO endorsement. Or please explain the plan to include this information at the first PIR.

November 14th 2024

Cleared

#### Agency Response

**Agency Response, November 5, 2024**

Thank you for bringing this to our attention. The project indicators have been reviewed and are consistent with BGI IP Core Indicators.

Project Indicators are now included in the Overview Table.

**Agency Response, November 13, 2024**

The following has been added to the comments in the CEO ER Cis and the CI worksheet: ?The METT scores for 1.2 and 2.2 will be confirmed and included in the first PIR ?

#### 5.4 Risks

- a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?
- b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?
- c) Are environmental and social risks, impacts and management measures adequately assessed and rated and consistent with requirements set out in SD/PL/03?

Secretariat comment at CEO Endorsement Request

9/18/2024

No, please provide explanation of how the overall risk was decided.

November 11th 2024

Cleared

#### Agency Response

**Agency Response November 5, 2024**

Section D of the CEOER ?Risks to Project Implementation? details different risk categories, with rating and mitigation measures. In this table, the overall risk based on the highest risk rating which is Substantial. Three of substantial risks are environmental and social risks, where the rating provided is prior to mitigation (i.e. not residual).

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response

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

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

**b) [If a child project under an integrated program] Is the project adequately aligned with the program objective in the GEF-8 programming directions?**

Secretariat comment at CEO Endorsement Request

9/18/2024

No, please also describe the consistency with the BGI IP GEF 8 programming directions.

November 11th 2024

Not cleared

Please also describe the consistency with the BGI IP GEF8.

November 14th 2024

Cleared

Agency Response

**Agency Response, November 5,2024**

Alignment with GEF 8 programming directions is now described in Section C- ?Alignment with GEF-8 Programming Strategies and country/regional Priorities?

**Agency Response, November 13, 2024**

The following text has been added; ?Finally, the project is fully consistent with the BGI Integrated program which aims to facilitate nature-positive development and reduce ecosystem degradation in SIDS by valuing nature and applying NbS with specific application to the food, tourism, and urban sectors. Indeed, the Comoros BGI project will use protected areas as drivers of sustainable development in the Union of Comoros, catalyzing the transformation of the food and tourism sectors as pillars of the Blue & Green Economy through nature positive action, decision-making and investments. In line with components 1 and 2 of the IP, the Comoros BGI project will incorporate the value of nature into decision-making and use innovative nature-based solutions to achieve development and the goals of the Multilateral Environment Agreements (MEAs), and address societal challenges related to food security, drought, climate change impacts.?

**6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors).**

Secretariat comment at CEO Endorsement Request

9/18/2024

No. Please provide some specific information about how this project relates to national plans including tourism and development. Also provide specific information related to the NBSAP and NDC.

November 11th 2024

Not cleared.

Please also discuss alignment with the UNCCD.

November 14th 2024

Cleared

#### Agency Response

##### Agency Response, November 5, 2024

Section C- ?Alignment with GEF-8 Programming Strategies and country/regional priorities? has been enhanced and now includes reference to the country?s NBSAP and NDC.

##### Agency Response, November 13, 2024

The following text has been added: ?The project also aligns with UNCCD targets, directly contributing to (i) achieving Land Degradation Neutrality (LDN); (ii) enhancing resilience to drought, in particular through reforestation activities which - as demonstrated in Comoros ? directly influences the flow of rivers; (iii) restoring ecosystems and protecting biodiversity; (iv) promoting sustainable agriculture (climate-smart agriculture including agroforestry); and (v) Improving livelihoods in affected areas.?

**6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e., BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?**

Secretariat comment at CEO Endorsement Request

9/18/2024

No, please provide more specificity on the KMGBF (such as on specific indicators).

November 11th 2024

Cleared

Agency Response

**Agency Response, November 5, 2024**

Details on the contribution of the project to the KMGBF added in Section C.

**7 D. Policy Requirements**

**7.1 Are the Policy Requirement sections completed?**

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**7.2 Is the Gender Action Plan uploaded?**

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**7.3 Is the stakeholder engagement plan uploaded?**

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**7.4 Have the required applicable safeguards documents been uploaded?**

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**8 Annexes**

**Annex A: Financing Tables**

**8.1 GEF Financing Table and Focal Area Elements: Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):**

**STAR allocation?**

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**LDCF under the principle of equitable access?**

Secretariat comment at CEO Endorsement RequestNA

Agency Response

**SCCF A (SIDS)?**

Secretariat comment at CEO Endorsement RequestNA

Agency Response

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response

**Focal Area Set Aside?**

Secretariat comment at CEO Endorsement RequestNA

Agency Response

## 8.2 Project Preparation Grant (PPG)

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

Secretariat comment at CEO Endorsement Request

9/18/2024

No, please request the agency to separate the contractual service activities into separate services for each profile to ensure clear tracking of roles and costs.

November 11th 2024

No cleared

Miscellaneous expenses and supplies are not eligible in this form. Please specify by formulating eligible expenses or delete them.

November 14th 2024

Cleared

## Agency Response

### Agency Response, November 5, 2024

PPG utilization table updated to include the roles that fall under the company that is being used for the project formulation; all contractual services are rendered by the same company.

### Agency Response, November 13, 2024

Miscellaneous expenses are eligible expenses for the GEF Agency and it refers to bank charges and related expenses. Therefore, a commitment of \$1,500 is still reflected in the PPG Fund Utilization, noting that no expenses have yet been charged on this budget line.

Supplies are eligible expenses for the GEF Agency and it refers to stationary acquisition costs for validation workshop and consultation meetings. Therefore, a commitment of \$850 is still reflected in the PPG Fund Utilization, noting that no expenses have yet been charged on this budget line.

## 8.3 Source of Funds

Does the sources of funds table match with the amounts in the OFP's LOE?

Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

#### Agency Response

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

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

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

#### Agency Response

**Annex B: Endorsements**

**8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:**

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

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

#### Agency Response

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

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

#### Agency Response

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

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**Annex C: Project Results Framework**

**8.6 a) Have the GEF core indicators been included?**

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

**c) Are all relevant indicators sex disaggregated?**

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

**e)[If a regional/global coordination child project under an integrated program] Does the results framework reflect the program-wide result framework, inclusive of results from child projects and specific to the regional/global coordination child project? [If a country child project under an integrated program] Is the child project result framework inclusive of program-wide metrics monitored across child project by the Regional/Global Child project?**

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**Annex E: Project map and coordinates**

**8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?**

Secretariat comment at CEO Endorsement Request

9/18/2024

No, The GeoName IDs do not seem to be available under the format of the <https://www.geonames.org/> platform. If the Agency confirms the locations shared are exact locations, then there is no need to provide a Geonames ID. As such, the Agency may elect not to enter the geoname ID. In case agency wish to enter the geoname ID, they can do so by either using an existing one on the <https://www.geonames.org/> platform or creating a new dedicated geoname ID directly through this same platform.

November 11th 2024

Cleared



Agency Response

**Agency Response, November 5, 2024**

The Agency confirms the locations shared are exact locations.

**Annex F: Environmental and Social Safeguards Documentation and Rating**

**8.8 Have the relevant safeguard documents been uploaded to the GEF Portal? Has the safeguards rating been provided and filled out in the ER field below the risk table?**

Secretariat comment at CEO Endorsement Request

9/18/2024

Yes.

Agency Response

**Annex G: GEF Budget template**

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

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

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

Secretariat comment at CEO Endorsement Request

9/18/2024

No.

a. For consultant as well as staff positions, please list each position in one line/row with budget allocation across components, M&E and PMC as applicable. Please don't bundle several positions in one line/row. Per the resubmission, we will review the budget again and provide comments if appropriate.

b. Procurement specialist should be charged 100% to PMC but not to project component.

November 11th 2024

c. Not cleared. Maintenance of vehicle : Fuel, petroleum and other oils should be categorized as Operating costs but not as Equipment. Please revise the budget table accordingly.

d. Not cleared : Misc expenses/unforeseen costs are not an eligible item, please either provide more detailed description of eligible operating costs or remove this item.

November 11th 2024

a. Not cleared : For consultant as well as staff positions, please list each position in one line/row with budget allocation across components, M&E and PMC as applicable. Please don't bundle several positions in one line/row. Per the resubmission, we will review the budget again and provide comments if appropriate

b. Please justify the need for 5 motorbikes.

c. Cleared

d. Cleared

November 14th 2024

a. Cleared

b. Cleared

#### Agency Response

##### Agency Response, November 5, 2024

- a. Done.
- b. Done
- c. Done.
- d. Done.

##### Agency Response, November 13, 2024

- e. Maintenance of vehicle is categorized as Operating Costs as per prior comments received on the same.
- d. There are no miscellaneous/unforeseen costs budgeted for in the work plan.
- a. The Agency's budget template does not allow to create multiple budget category in one Output. For ease of review, we have shown in bold each consultancy/staff position along with their sub-costs and the total cost of the line.
- b. Motorbikes are indispensable equipment for NP staff to get the necessary mobility for community mobilization and capacity development, and monitoring. Without the possibility to travel around and visit sites, fields, communities and companies, NP staff will not be able to properly implement project activities.

#### Annex H: NGI Relevant Annexes

8.10 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.

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

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response

Additional Annexes

**9. GEFSEC DECISION**

**9.1.GEFSEC Recommendation**

**Is the project recommended for approval**

Secretariat comment at CEO Endorsement Request

9/18/2024

Not at this time. Please revise and resubmit. The BGI team at UNDP and the GEF Secretariat are available for discussion.

November 11th 2024

The project is not ready for endorsement at this time. Please address the comments and resubmit.

November 14th 2024.

All the comments have been addressed. The CEO endorsement is now recommended.

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

Secretariat comment at CEO Endorsement Request

**9.3 Review Dates**

	CEO Approval	Response to Secretariat comments
<b>First Review</b>	9/18/2024	
<b>Additional Review (as necessary)</b>	11/11/2024	
<b>Additional Review (as necessary)</b>	11/14/2024	

CEO  
Approval

Response to Secretariat  
comments

<b>Additional Review (as necessary)</b>
<b>Additional Review (as necessary)</b>