

# Addressing the harmful effects of illegal gold mining on the environment and populations in the N'Zi region of Cote d'Ivoire: An integrated pilot approach to ecological restoration and social justice.

Review PIF and Make a recommendation

## Basic project information

**GEF ID**

12304

**Countries**

Cote d'Ivoire

**Project Name**

Addressing the harmful effects of illegal gold mining on the environment and populations in the N'Zi region of Cote d'Ivoire: An integrated pilot approach to ecological restoration and social justice.

**Agencies**

UNDP

**Date received by PM**

3/11/2026

**Review completed by PM**

**Program Manager**

Jonky Tenou

**Focal Area**

Multi Focal Area

**Project Type**

MSP

**GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET**

**1. General Project Information / Eligibility**

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

3/12/2026 The Chemicals and Waste components and activities overlap with an existing GEF-funded project in Côte d'Ivoire (the PlanetGOLD project), targeting the same geographic areas. The project could be considered eligible provided that the Agency revises the PIF to remove the overlapping activities, as outlined in the table below, along with the corresponding budget allocations. In addition, the PIF should be revised to reflect the country's remaining STAR allocation of USD 3,040,658.92. A new Letter of Endorsement will also be required.

Please resubmit an updated PIF for review.

4/6/2026 Yes. The project meets GEF eligibility requirements and the PIF presents a Multi-Focal Area approach (Biodiversity and Land Degradation) aligned with GEF-8 strategic objectives, including addressing biodiversity loss, land degradation, and mercury pollution from ASGM. The General Information table is complete. However, the proposed STAR allocation should be fully confirmed in the Government's Letter of Endorsement as there is minor discrepancy between the total amount indicated in the LoE (USD 3,040,659) and the amount reflected in the PIF table (USD 3,040,657), to avoid any potential eligibility or clearance issues (refer to section 8.5) endorsement section. In addition, this project does not targets Climate Change Mitigation - please remove the text from the field 'Project Sector (CCM Only)'

General Project information 			
Project Title:	Addressing the harmful effects of illegal gold mining on the environment and populations in the NZI region of Côte d'Ivoire: An integrated pilot approach to ecological restoration and social justice.		
Region:	Africa	GEF Project ID:	12304
Country(ies):	Cote d'Ivoire	Type of Project:	MSP
GEF Agency(ies):	UNDP	GEF Agency ID:	10508
Executing Partner:	Ministry of Environment, and Ecological Transition (MINETE)	Executing Partner Type:	Government
GEF Focal Area (s):	Multi Focal Area	Submission Date :	3/10/2026
Project Sector (CCM Only):	Mixed & Others		

<b>New project proposed area / activity</b>	<b>Where planetGOLD already addresses the same or a very similar activity</b>
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<p><b>Mercury-free techniques and BAT/BEP at ASGM sites (High overlap)</b></p> <p>New project proposes sustainable implementation of mercury-free techniques and BAT/BEP across ASGM sites in the N?Zi region, including selected mining sites, while explicitly building on planetGOLD tools and experience. (New project pp.24-25)</p>	<p>planetGOLD already has a dedicated mercury-free technologies component. It includes Outcome 3 on miners adopting mercury-free processing techniques, Output 3.2 on capacitating miners and communities to use mercury-free technologies, and a training programme for mercury-free equipment. It also builds on previously procured COOPEDA equipment as a demonstration and learning platform. (planetGOLD pp.7, 42-44)</p>
<p><b>Awareness-raising and behavior change on mercury, health, and environmental risks (High overlap)</b></p> <p>New project proposes awareness-raising on best mercury-free techniques and BAT/BEP, plus behavior-change and information campaigns on the health and environmental risks linked to mercury. (New project pp.25, 29)</p>	<p>planetGOLD already covers this directly through Output 3.1. It develops sensitization materials on the harms of mercury, supports site-based sensitization sessions, and plans radio spots and posters on mercury risks, PPE, retorts, and mercury-free processing. (planetGOLD pp.7, 43, 46)</p>
<p><b>Miner training using planetGOLD materials (High overlap)</b></p> <p>New project sets a target of training 1,000 miners using planetGOLD training materials and proposes training on mercury-free extraction techniques and BAT/BEP, plus exchanges between trained miners and others. (New project pp.5, 25)</p>	<p>planetGOLD already funds sensitization and training programmes through mining vocational schools, including pedagogical materials, technical experts, equipment support, and peer learning through visits to the COOPEDA demonstration site. (planetGOLD pp.37-38, 44)</p>
<p><b>Capacity building for government, local authorities, and local stakeholders (High overlap)</b></p> <p>New project proposes training for government staff and local authorities on mercury-free BAT/BEP, biodiversity-sensitive ASGM management, and sub-national enforcement and monitoring capacity. (New project p.24)</p>	<p>planetGOLD already aims to increase government and national stakeholder capacity to formalize the ASGM sector, and it explicitly invests in training national officials so they can build the capacity of local stakeholders in key mining areas. Component 4 also includes local capacity-building support. (planetGOLD pp.6-7, 50)</p>
<p><b>Formalization, NAP operationalization, and regulatory strengthening (High overlap)</b></p> <p>New project proposes policy and regulatory review, updating and operationalizing the National Action Plan for ASGM, developing implementation manuals and enforcement guidance, and building on formalization strategies from planetGOLD. (New project pp.24, 31)</p>	<p>planetGOLD already has a Formalization Optimization component. It includes analysis of the legal, regulatory, and policy framework, support to vocational schools aligned with the government's ASGM formalization strategy, and a formalization guide to clarify processes for government and miners. (planetGOLD pp.6, 37, 50)</p>

<p><b>Stakeholder workshops, policy dissemination, and multi-stakeholder coordination (High overlap)</b></p> <p>New project proposes multi-stakeholder workshops to validate regulatory updates and disseminate guidance, plus regular stakeholder dialogues and cross-project learning. (New project pp.24, 29)</p>	<p>planetGOLD already provides for annual stakeholder workshops, workshop support to local stakeholder groups, and national and regional knowledge-sharing events. Under the jurisdictional/landscape approach, it also supports local stakeholder processes such as gap and SWOT analysis. (planetGOLD pp.37, 39, 45, 47)</p>
<p><b>Knowledge management, community of practice, and digital platforms (High overlap on KM; moderate overlap on the broader monitoring layer)</b></p> <p>New project proposes a knowledge-management system, community of practice, digital platform, and an integrated digital monitoring and reporting platform. It explicitly says it will build on existing planetGOLD digital platforms to avoid duplication. (New project pp.29-30)</p>	<p>planetGOLD already has a full knowledge-sharing and communication component. Its knowledge products and tools are made available nationally and globally through the planetGOLD programme, and the project contributes to the planetGOLD knowledge platform. The knowledge-platform overlap is direct, while the new project's wider environmental M&amp;E layer is somewhat more additional. (planetGOLD pp.7-8, 46)</p>
<p><b>Communication materials and harmonized messaging (High overlap)</b></p> <p>New project proposes to develop or strengthen educational materials in line with planetGOLD outputs and explicitly calls for harmonized messages and joint communication materials with planetGOLD. (New project pp.29, 31)</p>	<p>planetGOLD already develops sensitization and training tools, pamphlets, posters, booklets, blogs, technical briefs, radio spots, and other communication products for national and local use. (planetGOLD pp.38, 43, 46)</p>
<p><b>Landscape / land-use governance in mining areas (Partial to moderate overlap)</b></p> <p>New project proposes integrated land-use plans, training on integrated landscape management, and landscape partnerships / multistakeholder platforms in N?Zi ASGM landscapes. (New project pp.6-7, 26-27)</p>	<p>planetGOLD already pilots a Jurisdictional / Landscape Approach for ASGM. This includes stakeholder introduction, local gap and SWOT analysis, multistakeholder collaboration, and using lessons from the pilot to inform government policy. The overlap is in the governance method, though the new project applies it more broadly to biodiversity restoration and SLM. (planetGOLD pp.6, 39, 45, 49-50)</p>
<p><b>Geographic overlap in N?Zi target sites (High geographic overlap)</b></p> <p>New project is centered on the N?Zi region and highlights sites such as Boor?/Etienkro, Djangokro, Bassa Kouadiokro, Tanoh Akakro, and the Bocanda / Dimbokro area. (New project pp.12, 21)</p>	<p>planetGOLD already lists Centre N?Zi among its target areas, specifically naming Dimbokro, Boor? Akpokro, and Djangokro. That means duplication risk is not only thematic but also spatial. (planetGOLD p.42; see also p.37 for Dimbokro among preliminary intervention locations)</p>

Agency's Comments

UNDP Response, April 27 2026

We have revised the LoE to align with the PIF budget table (USD 3,040,657) and removed the text in the CCM box. The revised LoE has been uploaded to the portal.

Source of Funds	GEF Agency	Focal Area Source	Amount (in US\$)				Total
			GEF Project Financing	GEF Project Financing Agency Fee	Project Preparation Grant (PPG)	Project Preparation Grant (PPG) Agency Fee	
GEFTF	UNDP	BD STAR	2,250,731	213,819	84,081	7,988	2,556,619
GEFTF	UNDP	LD STAR	426,125	40,482	15,919	1,512	484,038
<b>Total GEF Resources</b>			<b>2,676,856</b>	<b>254,301</b>	<b>100,000</b>	<b>9,500</b>	<b>3,040,657</b>

UNDP Response; 31 March 2026

We would like to extend our sincere appreciation to the GEF Secretariat for the constructive guidance provided to refine the PIF, particularly in ensuring that the project's focus is not centered on mercury-related pollution. Following continued consultations with the Ministry of Environment and Ecological Transition, it remains evident that the project and its overall scope are highly relevant for Côte d'Ivoire. At the same time, the government considers it important that certain ASGM-related dimensions continue to be reflected, appropriately, within the PIF design.

During our discussions with the PlanetGOLD team, it was further confirmed that the ASGM sites targeted under this new project do **not** overlap with those currently covered by PlanetGOLD. This reinforces the complementarity of the two initiatives while ensuring that efforts remain aligned with national priorities.

In response to the Secretariat's recommendations and in close coordination with national partners, we have made the following adjustments:

- **Removed two outputs under Component 1** that were directly linked to ASGM and mercury-use issues.
- **Revised the problem analysis and barriers** to place stronger emphasis on biodiversity and land-degradation challenges.
- **Removed the Global Environmental Benefit (GEB) on mercury reduction** from both the PIF and the GEF Core Indicator sheet.
- **Updated the Theory of Change diagram** to fully reflect the conceptual and structural changes introduced.
- **Reduced the budget for Component 1** from **USD 500,000 to USD 200,000** in alignment with the revised scope.
- **Revised the overall project budget** to align with the remaining BD and LD STAR allocations. The associated LoE has also been updated, and a draft has been uploaded for this resubmission while we await the revised signed version.

All modifications in the PIF have been **highlighted in yellow** for ease of reference.

## 2. Project Summary

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

Secretariat's Comments

4/6/2026 Yes. The Project summary clearly presents the problem, objectives, approach, and expected Global Environmental Benefits. It explains how ASGM in the N?Zi region drives mercury pollution, land degradation, deforestation, and biodiversity loss, and outlines an integrated, three-pillar response aligned with the project components and key results. Overall, it meets PIF requirements; however, the objective could be sharpened for clarity, the transformative dimension stated more explicitly, and some dense sentences streamlined.

#### Agency's Comments

UNDP response, April 27, 2026

We have revised the PIF objective and believe that the updated version is clearer and more transformative than the previous one. The revised objective is as follows:

**To reduce the harmful social and environmental impacts of illegal artisanal and small-scale gold mining (ASGM) in the N?Zi region through an integrated approach that reduces degradation, restores ecosystems, and promotes inclusive and sustainable livelihood practices.**

#### 3 Indicative Project Overview

- 3.1 a) Is the project objective presented as a concise statement and clear?  
b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?**

Secretariat's Comments 4/6/2026 Yes. The PIF presents a clear objective supported by a coherent results framework, with well-aligned components, outcomes, and outputs. The implicit Theory of Change is sound, linking policy, capacity building, and livelihood alternatives to environmental benefits. Cross-cutting priorities, including gender, knowledge management, and M&E, are appropriately integrated and budgeted.

#### Agency's Comments

UNDP Response, April 27, 2026

We are grateful for this appreciation from the GEFSEC

- 3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?**

#### Secretariat's Comments

4/6/2026 Yes. The PIF demonstrates alignment with GEF policy on gender, knowledge management, and monitoring and evaluation. Gender considerations are reflected through sex-disaggregated targets and support to women- and youth-led enterprises, though women are explicitly referenced in only one output; stronger integration across the results framework is therefore recommended. Knowledge management is adequately resourced under Component 3, and M&E and project management costs are within acceptable thresholds. The reference to WOCAT is noted, and UNDP is encouraged to support C?te d'Ivoire in populating the database with national SLM practices, in line with UNCCD COP decisions.

#### Agency's Comments

UNDP Response, April 27, 2026

We are grateful for this appreciation from the GEFSEC, and UNDP is fully committed to supporting the sharing of Côte d'Ivoire's SLM practices with the WOCAT database and will ensure this is done under this and other ongoing projects.

**3.3 a) Are the components adequately funded?**

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

**c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?**

Secretariat's Comments 4/6/2026 Yes. The components are adequately funded and well balanced relative to their scope. Component 1 appropriately receives the largest share of GEF (\$1.463M, 57% of grant) and co-financing, reflecting its capital-intensive policy, planning, and enforcement focus. Component 2 is sufficiently resourced for community-level livelihood interventions (\$842k, 33%), supported by substantial government co-financing. Components 3 (knowledge, \$166k GEF, 6.5%) and 4 (M&E, \$78k GEF, ~3%) are lean but proportionate to their functions and adequately supported by co-financing. Project management costs are within the allowable threshold and represent an efficient share of total project costs, indicating prudent use of resources.

Agency's Comments

UNDP Response, April 27, 2026

We welcome and appreciate this positive recognition from the GEFSEC.

#### **4 Project Outline**

##### **A. Project Rationale**

##### **4.1 SITUATION ANALYSIS**

**a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?**

**b) Are the key barriers and enablers identified?**

Secretariat's Comments 4/6/2026 Yes. The section provides a solid evidence-based baseline of ASGM in Côte d'Ivoire, particularly in the N'Zi region, clearly outlining globally significant environmental impacts (mercury pollution, land degradation, and biodiversity loss) and their socio-economic drivers. The analysis demonstrates good systems thinking by linking environmental harm to poverty, migration, and weak governance, and it credibly describes a deteriorating without-project scenario. However, the section would benefit from greater concision and clearer structuring of key barriers.

Agency's Comments

UNDP Response, April 27, 2026

We appreciate the Secretariat's positive feedback on our evidence base and systems-thinking approach. We have refined the Barriers section based on your recommendation for better

conclusion. We simplified the structure by merging six overlapping barriers into four distinct pillars (Governance, Technical capacity, Livelihoods, and Knowledge). By removing extra national-level statistics and focusing on the N?Zi region's local context, we've created a much clearer link between the problems on the ground and the proposed project's interventions. We appreciate the opportunity to make the proposal stronger.

### **Key Barriers to reduce ASGM-driven environment degradation in the N?Zi region**

Despite ambitious national strategies to protect forests and regulate Artisanal and Small-Scale Gold Mining (ASGM), several critical barriers prevent the transition to protection of critical ecosystems and sustainable landscape management in C?te d'Ivoire's N?Zi region.

#### **Barrier 1: Fragmented governance and weak enforcement of land of ASGM regulations**

While national frameworks exist, they rarely translate into action on the ground. The country has lost nearly 90% of its forest cover since 1960 (Traor?, 2025), with the N?Zi region facing intense land pressure. Landscape governance remains highly siloed across environmental, agricultural and mining institutions, lacking coordinated land-use planning. In remote areas, local services lack staff, training, and resources to enforce rules or help miners adopt safer, mercury-free practices. As a result, ASGM becomes an additional pressure on ecosystems that are already struggling to regenerate.

#### **Barrier 2: Insufficient technical capacity for SLM and pollution mitigation**

Farmers and miners in N?Zi live the effects of land degradation daily, yet they often lack practical knowledge and support to adopt more sustainable techniques. C?te d'Ivoire has no ongoing or achieved LDN targets (UNCCD, [country profile](#)), reflecting deep gaps in technical capacity. ASGM actors similarly have limited access to training on mercury-free techniques, site rehabilitation, or waste management, keeping harmful practices in place. Consequently, local ecosystems face unmitigated pollution—from toxic residues to severe sediment runoff—with no reliable monitoring systems in place to track contamination before it permanently damages local agriculture and water systems.

#### **Barrier 3: Limited livelihood diversification and continued dependence on ASGM**

As land degrades and agricultural yields fall, many rural families have fewer ways to earn a living. Desertification affects 60% of the country, and up to 90% of the north (UNEP/GRID, [Land](#)), pushing people to migrate toward the forest zones or rely on extractive activities like ASGM. For many youths, especially those without access to land, credit, or training, mining becomes one of the few available livelihood options. But this dependence reinforces environmental pressures, reduces food security, and keeps communities locked in cycles of resource depletion. Without meaningful livelihood alternatives, change will be hard to sustain.

#### **Barrier 4: Weak knowledge systems to catalyze Nature Positive practices**

Across C?te d'Ivoire, communities increasingly recognize the impacts of environmental decline—70.6% link deforestation to land degradation, 63.8% to biodiversity loss, 56.9% to climate warming (Kouassi et al., 2021). But awareness alone doesn't translate into action. Many communities and institutions lack opportunities for training, local learning, or peer exchange. Miners often have no access to information on mercury-free techniques or safe waste management. Institutions lack platforms to share data, coordinate, or jointly solve problems. Without stronger knowledge systems, communication channels, and practical demonstrations, communities cannot easily shift to more sustainable routines or influence positive change.

Overcoming these interconnected barriers requires a systemic shift: strengthening cross-sectoral governance, deploying targeted technical training for pollution-free mining and SLM, empowering communities with sustainable livelihood alternatives, and building robust knowledge networks to ensure long-term resilience in the N?Zi landscape.

## 4.2 JUSTIFICATION FOR PROJECT

**a) Is there an indication of why the project approach has been selected over other potential options?**

**b) Does it ensure resilience to future changes in the drivers?**

**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?**

**d) are the relevant stakeholders and their roles adequately described?**

### Secretariat's Comments

4/6/2026 Yes. The PIF provides a clear justification for the project by contrasting a fragmented, weakly implemented baseline with an integrated GEF alternative that builds on initiatives such as planetGOLD while adding value through biodiversity restoration and livelihoods. The approach is coherent and incremental, though the justification could be strengthened during the CEO endorsement by more explicitly comparing alternatives, clarifying stakeholder roles, and highlighting resilience to future drivers and avoidance of duplication.

### Agency's Comments

UNDP response, April 27, 2026

We appreciate this positive feedback and guidance from the GEF Secretariat, and we will strengthen the justification during the PPG.

## 5 B. Project Description

### 5.1 THEORY OF CHANGE

**a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?**

**b) Are the key outputs of each component defined (where possible)?**

### Secretariat's Comments

4/6/2026 Yes. The PIF presents a coherent ToC with linkages between components, outputs, and intended outcomes. While the pathways are sound, the ToC would benefit from clearer articulation of key assumptions, intermediate steps, and the added value of GEF support beyond the baseline. UNDP should also confirm that Outputs 1.1.1?1.1.4 do not duplicate Minamata Convention enabling activities financed and the GOLD project.

The proposed partnership with Village Savings and Credit Associations (Associations Villageoises d'Épargne et de Crédit ? AVEC) is promising, and a strong commitment of resources to this collaboration is encouraged.

## Agency's Comments

UNDP response, April 27, 2026

We have revised the Theory of Change to more clearly articulate the key assumptions, intermediate steps, and the added value of GEF support beyond the baseline. These refinements have been incorporated to enhance clarity and strengthen the overall logic of the framework, as described in the following paragraphs of the Theory of Change:

Ultimately, the project contributes to the effective implementation of the Minamata Convention on Mercury, while generating synergies with other Multilateral Environmental Agreements, notably the Convention on Biological Diversity (CBD) and the Kunming-Montreal Global Biodiversity Framework (KMGBF) and Land Degradation Neutrality, by addressing pollution at source, restoring ecosystem functions, and strengthening community-based stewardship of land and natural resources.

Without GEF intervention, N?Zi's institutions will remain siloed while families continue relying on degrading mining and farming practices to survive. GEF's added value is catalytic: it lowers the barriers to the costly transition to clean technologies that miners cannot afford alone, while funding the unified, cross-sectoral governance that local authorities cannot build on their own.

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It also builds on successful pilot community rehabilitation initiatives (notably in Boor? Akpokro), demonstrating the technical and social feasibility of ecosystem restoration through agroforestry approaches, improved stoves, and ecological materials (AEIE, 2024; Embassy of Canada, 2024).

The Theory of Change recognizes that capacity building alone is insufficient to deliver Global Environmental Benefits (GEBs) in a context of weak enforcement, limited technical capacity, and reliance on ASGM for livelihoods. The critical intermediate step is targeted barrier removal through the transfer of Best Available Techniques and Practices (BAT/BEP) for ASGM, technical support for sustainable land management (SLM), and strengthened local knowledge?sharing. By addressing environmental risks while improving economic viability, these measures enable the sustained adoption of mercury?free mining and SLM by miners, farmers, and cooperatives, an essential condition for lasting mercury elimination and ecosystem restoration.

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The expected impact of the project is the sustained reduction of environmental and health risks associated with ecosystem degradation and pollution, alongside strengthened community resilience and adaptive capacity through the adoption of sustainable land management and biodiversity-friendly practices.

The ToC is based on these core assumptions:

- Sustained political will: Decentralized authorities maintain the commitment to enforce landscape-level mainstreaming and regulations.
- Economic viability: The adoption of BAT/BEP and SLM alternatives generates higher returns than the informal, mercury-based baseline.
- Market responsiveness: Local communities are willing to shift practices when provided with technical support and market-based incentives.

We will ensure that Outputs 1.1.1 and 1.1.2 (formerly Output 1.1.4 in the initial PIF) do not duplicate Minamata Convention enabling activities or the planetGOLD project. Instead, their implementation will build on and leverage planetGOLD experience and materials, as outlined in the PIF.

## 5.2 INCREMENTAL/ADDITIONAL COST REASONING

**Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?**

Secretariat's Comments 4/6/2026 Yes. The PIF conveys incremental reasoning by showing how existing policies, plans, and parallel initiatives form a limited baseline that lacks the resources, coordination, and scope to deliver global environmental benefits. It demonstrates that GEF support adds value by filling critical gaps—particularly in ecosystem restoration, integrated landscape management, and mercury reduction—while complementing co-financed activities focused on formalization and security. However, this reasoning remains mostly implicit, and the justification would be strengthened by a short, explicit paragraph clearly stating what global benefits are achieved because of GEF funding and why these outcomes would not occur under the baseline alone.

Agency's Comments

UNDP response, April 27, 2026

In response to the GEF Secretariat's comment, the justification has been strengthened to make the project's incremental reasoning more explicit. A concise paragraph has been added to clearly articulate the global environmental benefits enabled by GEF financing and to explain why these outcomes would not be achieved under the baseline of existing policies and parallel initiatives alone. The added text is included in the Justification and Alternative Scenario sections:

*Despite important baseline initiatives, significant gaps remain in addressing the barriers affecting the N?Zi region. Existing programmes primarily focus on ASGM formalization, awareness-raising, and site-specific mercury reduction, but they do not adequately tackle fragmented governance, weak enforcement, limited technical capacity, insufficient livelihood alternatives, or weak knowledge systems. Moreover, current interventions are geographically limited and lack an integrated landscape management perspective capable of addressing the combined social and environmental impacts of illegal mining, land degradation, deforestation, and biodiversity loss.*

*GEF financing is therefore incremental, as it enables an integrated response that directly addresses these systemic barriers and delivers global environmental benefits that would not occur under the baseline alone. The project will improve the management of 25,525 ha of classified forests, apply sustainable land management practices on 100,000 ha of production landscapes, reduce mercury pollution through targeted support to 1,000 miners, and enable 25,000 beneficiaries to adopt sustainable land use practices. By integrating ecosystem restoration, mercury-free mining, agroecology practices, and strengthened governance within the wider landscape, applying an ILM approach, the project will reduce pressure on forests, land, freshwater systems, and biodiversity while enhancing long-term socio-ecological resilience in the N?Zi region.*

## 5.3 IMPLEMENTATION FRAMEWORK

**a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?**

**b) Comments to proposed agency execution support (if agency expects to request exception).**

**c) is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area**

**d) are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?**

Secretariat's Comments 4/6/2026 Yes. The PIF outlines a sound implementation framework, with MINETE appropriately designated as the executing partner and a clear intention to coordinate across relevant ministries, the NC/GEF, and ongoing initiatives such as planetGOLD. The emphasis on collaboration and knowledge sharing is a notable strength. However, the framework would benefit from clearer definition of execution arrangements, stakeholder roles, and coordination mechanisms to strengthen operational clarity and accountability at CEO endorsement. In addition, complementarities with existing initiatives on mercury, natural resource management, ecosystem restoration, the Net Zero Nature Positive IP project, and GEF Enabling Activities could be more explicitly articulated to demonstrate coherence and avoid duplication.

Agency's Comments

UNDP Response, April 27, 2026

We acknowledge the Secretariat's comment. The detailed execution arrangements, stakeholder roles, coordination mechanisms, and articulation of complementarities with ongoing initiatives will be further developed and clarified during the PPG phase to ensure strong operational clarity, accountability, and coherence at CEO endorsement.

*We have added this paragraph under the Coordination and Cooperation with Ongoing Initiatives and Project:*

*The project will be executed by the Ministry of Environment and Ecological Transition (MINETE), leveraging its mandate on environmental governance and coordination of ASGM and mercury-related interventions. Implementation will be carried out in close collaboration with relevant sectoral ministries responsible for mining, land management, agriculture, and decentralization, as well as the National GEF Coordination Unit (NC/GEF).*

*At the national level, an inter-institutional steering mechanism will provide strategic oversight and facilitate coordination across sectors and ongoing initiatives. At the local level, decentralized authorities, producer cooperatives, and community-based organizations will play a central role in implementation, monitoring, and knowledge exchange.*

*While the PIF establishes these core execution and coordination principles, detailed roles, reporting lines, operational protocols, and stakeholder engagement mechanisms will be defined and validated during the Project Preparation Grant (PPG) phase, ensuring operational clarity, accountability, and alignment with national systems prior to CEO endorsement.*

**5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?**

**b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?**

Secretariat's Comments

4/6/2026 Yes. The project selects relevant GEF Core Indicators with well-justified targets aligned with its objectives, including 25,525 ha under improved forest management, 100,000 ha of land under sustainable practices, and 29,400 direct beneficiaries. Please refer to comments in Section 6.1.

For Core Indicator 1.2, please include WDPA ID, IUCN Category, and METT score for the listed protected areas

#### Agency's Comments

##### UNDP Response, April 27, 2026

We have identified the IUCN category for both classified forests as IUCN Category VI ? Protected Area with Sustainable Use of Natural Resources, and this information has been added to the GEF Core Indicator Tracking Tool. We have also included the corresponding WDPA IDs, namely 29580 for the Classified Forest of Ahoua and 300869 for the Classified Forest of Ab?anou.

With respect to the METT score, assessments in C?te d'Ivoire have been conducted only for national parks and wildlife reserves and not for classified forests. Consequently, METT assessments for the Ahoua and Ab?anou Classified Forests will be undertaken during the PPG phase, and the GEF Core Indicator Tracking Tool will be updated accordingly.

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

Secretariat's Comments n/a

#### Agency's Comments

##### 5.6 RISKS

**a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?**

**b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?**

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

Secretariat's Comments

4/6/2026 Yes. The PIF presents a relevant risk assessment covering technical, environmental and social, governance, institutional, financial, and stakeholder risks, with ratings and mitigation measures aligned with GEF and UNDP safeguards. The overall risk classification is currently phrased ambiguously as ?High or Substantial,? and a single classification should be selected before finalizing the PIF. Please consider addressing the points below:

1. Under Climate risk mitigation narrative, please strengthen with specific climate-resilient techniques; consider upgrading to Substantial.
2. Under institutional & Policy risk framing, please rephrase to focus on genuinely novel institutional/regulatory elements; reassess rating.

2. Under technological risk framing, please rephrase to anchor in the innovative technology application, or reconsider applicability of category.
3. Under financial & Business Model risk framing, please rephrase to reflect specific financial/business model innovation; avoid conflating with fiduciary risk.
4. Under E&S vs. SESP consistency, please confirm SESP rating aligns with Substantial E&S rating once SESP is completed during PPG.
5. Under executing role at PIF stage, please remove or clarify language that conflates UNDP's IA role with an executing function.

## Agency's Comments

UNDP response, April 27, 2026

We have updated the risk section to reflect the specific realities of the N'Zi region. Specifically:

1. Climate risk: This risk upgraded to Substantial. The narrative has been strengthened with specific SLM techniques: Assisted Natural Regeneration (RNA) for higher survival, soil moisture retention via heavy mulching/Mucuna cover crops on degraded sites, and multi-strata agroforestry with drought-tolerant indigenous trees for microclimate regulation.

2. Institutional & policy risk: The institutional and policy risk has been rephrased to focus on the project's genuinely novel elements, including piloting decentralized regulatory instruments, landscape-level zoning, and incentive-based compliance mechanisms. The risk rating has been reassessed accordingly to reflect the targeted and phased nature of these innovations.

3. Technological risk: The narrative has been reframed to anchor in innovative mercury-free ASGM and SLM restoration technologies. Mitigation focuses on leveraging planetGOLD lessons, training local artisans for equipment maintenance, and using Field Schools to demonstrate technical efficacy and profitability.

4. Financial & Business Model Risk: the narrative has been revised to focus exclusively on business model innovations (NTPF market volatility and microfinance sustainability). All language conflating this with fiduciary or procurement risk has been removed.

5. E&S vs. SESP Consistency: The full SESP to be conducted during the PPG phase will be rigorously aligned with the current Substantial E&S risk rating to ensure total consistency across GEF and UNDP safeguard frameworks.

6. All language referencing UNDP's IA oversight with executing functions has been removed. The PIF now strictly defines MINETE as the lead Executing Entity in compliance with GEF policy.

See below the revised risks table

RISK CATEGORIES	RATINGS	ASSESSMENT AND MITIGATION MEASURES
CONTEXT		

Climate

substantial

**Exposure to challenging weather conditions impact project activities**

? Project activities may be delayed due to climate related impacts, including damage to infrastructure, alteration of the transportation network which may limit the effective organization of field visits, trainings and similar activities in remote areas.

? Restoration approaches and/or selected plantations may not withstand certain climate extremes.

**Possible Mitigation measures:**

? Conduct a climate risk screening of the project area to identify areas especially vulnerable to climate change effects and natural disasters and to inform the design of the project's activities

? Develop a workplan considering seasonal calendar of the targeted regions to ensure field activities are conducted during appropriate periods.

? SLM technologies including (i) Assisted Natural Regeneration (ANR): Prioritizing the protection of resilient, naturally occurring tree shoots over vulnerable new seedlings to ensure higher survival rates; (ii) Soil Moisture Retention: Using heavy mulching and cover crops (e.g., Mucuna) to protect soil from extreme heat and retain moisture on degraded ASGM sites and production landscapes; (iii) Climate-Resilient Agroforestry: Implementing multi-strata systems with drought-tolerant, indigenous shade trees to regulate microclimates.

Environment and Social

Substantial

**Land use conflicts and impacts on livelihoods**

? ASGM sector represents a considerable source of income for mining communities. As such, miners may be concerned about the reduction of economic benefits generated through ASGM, consequently impacting their livelihoods. Restoration may restrict access to previously mined land. Exacerbation of conflicts between miners and farmers is a potential risk.

**Exclusion of vulnerable/marginalized stakeholder groups, including women, youth, migrant miners**

? Vulnerable/marginalized stakeholder groups might not effectively participate in and/or benefit from the project activities.

**Unintended adverse effects on biodiversity**

? Application of selected restoration methods may not be adapted to targeted sites, unintentionally introduce invasive species, soil degradation or otherwise lead to unintended adverse effects on local biodiversity if implemented without adequate safeguards.

**Occupational, health and safety risks**

? Transition to new technologies might introduce unfamiliar hazards. Personnel involved in remediation activities could be exposed to pollutants and other occupational risks. Inadequate working conditions (lack of protective equipment, etc.) and use of child labor are potential risks.

**Pollution and waste handling risks**

? Remediation/restoration, including manipulation of sediments/wastes, of degraded lands could lead to mercury mobilization and re-release into waterways.

**Ongoing community health risks**

? Exposure to persistent pollution and to potential re-release of pollutants from on-the-ground interventions.

**Possible mitigation measures:**

? A comprehensive gender (role and barriers for women on access and management of natural resources, engagement and impacts of ASGM activity on women) and stakeholder analysis (mapping out relations between ASGM and livelihoods, socio-economic context and potential drivers for conflict) will be conducted during the PPG to inform the development of a Gender Action Plan and a comprehensive Stakeholder Engagement Plan

		<ul style="list-style-type: none"> <li>? Scoped assessment and Environmental and Social Management Plan for on-the-ground interventions</li> <li>? Community health awareness campaigns</li> <li>? Participatory community E&amp;S monitoring program and capacity training</li> <li>? Participatory approaches</li> <li>? Gender-sensitive Grievance Redress Mechanism (GRM) at the project level</li> <li>? Information sessions to present benefits, including from new nature-based value chains and enterprises, and long-term advantages for human health, will be organized to ensure targeted groups approve proposed initiatives and are engaged in restoration actions.</li> <li>? Target the most viable priority sites; use adapted local species; combine reforestation, agroforestry and sustainable soil management practices with opportunities for value chain development and restoration jobs.</li> </ul>
Political and Governance	Moderate	<p><b>Institutional and political changes may affect country's priorities and effective implementation of project activities</b></p> <p>? Changes in political structures and frameworks may affect national and local priorities, resulting in lack of engagement from institutional stakeholders and delays in decision-making towards enforcement measures, but also with regards to the support to restoration measures to be implemented. Furthermore, the absence of clear commitment from government officials may also affect coordination mechanisms under the project.</p> <p><b>Possible mitigation measures</b></p> <ul style="list-style-type: none"> <li>? Formalization of the inter-agency coordination mechanisms may be proposed, along with legally binding agreements to secure institutional engagement.</li> <li>? Develop an internal communication strategy and associated monitoring plan to support the establishment of transparency mechanisms; promote participatory community monitoring; produce regular public reports.</li> </ul>
INNOVATION		

<p>Institutional and Policy</p>	<p>Substantial</p>	<p><b>Innovative regulatory framework and related enforcement measures impacted by institutional gaps</b></p> <p>? Updates and strengthening of existing institutional and regulatory frameworks, especially along with enforcement measures would be key to ensure sustainable reduction of ASGM impacts on environment and long-term efficiency of restoration actions. However, innovative nature of such approaches may receive certain resistance regarding their adoption and implementation, which could delay project activities and overall progress.</p> <p><b>Possible mitigation measures</b></p> <p>? Facilitate specific Prefectural decrees (Arrêtés Préfectoraux) to legally clarify the monitoring roles of decentralized agencies and local committees.</p> <p>? Pilot the new regulatory and zoning frameworks in selected N'Zi municipalities to build local institutional capacity before scaling region-wide.</p> <p>? Build on the PlanetGOLD result to tie compliance with new formalization rules to tangible project benefits, such as priority access to mercury-free equipment and land tenure support.</p> <p>? Operationalize a joint N'Zi landscape committee to resolve jurisdictional overlaps between mining, environment, and agricultural authorities.</p>
<p>Technological</p>	<p>Moderate</p>	<p><b>Challenges in data collection and testing restoration techniques</b></p> <p>? National capacities for quantifying mercury concentrations in targeted ecosystems may be limited.</p> <p>? Ensuring selected restoration, SLM and free-mercury techniques are pertinent and concretely effective may be needed to support decision-making and community engagement.</p> <p><b>Possible mitigation measures</b></p> <p>? Directly apply lessons and technical materials from planetGOLD Côte d'Ivoire to select proven, off-grid, and context-appropriate mercury-free technologies.</p> <p>? Train local N'Zi mechanics and artisans to manufacture, repair, and maintain both ASGM and SLM equipment to prevent breakdown and reliance on external experts.</p> <p>? Establish local Farmer/Miner Field Schools to temporarily subsidize and practically demonstrate the profitability and yield benefits of these clean technologies.</p>

Financial and Business Model

Moderate

**Financial unviability of mercury-free ASGM and SLM Transitions:**

The transition to mercury-free ASGM and Sustainable Land Management (SLM) requires significant upfront capital. If local microfinance institutions (MFIs) in the N'Zi region perceive these innovative business models as too "risky" to fund, cooperatives will be unable to afford the clean technologies. Without financial viability, actors will inevitably revert to cheap, unsafe and environmentally degrading practices.

**Possible mitigation measures**

? Partner with the private sector, especially with local MFIs in the N'Zi region to establish a targeted revolving fund or guaranteed micro-credit lines specifically designed for formalized ASGM cooperatives to purchase clean equipment.

? Provide financial literacy training and assist mining and farming cooperatives in drafting formal, bankable business plans to prove the profitability of mercury-free mining and SLM agro-enterprises to local lenders.

? Connect SLM-based alternative livelihoods directly to profitable local and regional markets to ensure sustained income and long-term business model viability post-project.

EXECUTION

Capacity for Implementation	Moderate	<p><b>Insufficient capacity of the Executing Agency (MINETE) and local partners to execute complex project activities:</b></p> <p>Under the National Implementation Modality (NIM), MINETE acts as the Executing Agency. Capacity gaps within MINETE, the <i>Conseil R?gional</i>, or local partners regarding complex UNDP and GEF reporting requirements or multi-sectoral ASGM/SLM coordination could cause implementation delays.</p> <p><b>Possible mitigation measures:</b></p> <ul style="list-style-type: none"> <li>? Build on the planetGOLD experience and Conduct thorough capacity assessments during the PPG phase and train MINETE?s Project Management Unit (PMU) on specific GEF fiduciary, reporting, and technical standards.</li> <li>? Partner with specialized entities (e.g., <i>Centre Africain pour la Sant? et l'Environnement</i> (CASE)) to provide direct technical assistance and implement a structured skills transfer plan for MINETE and local decentralized execution teams.</li> <li>? Establish clear communication and coordination protocols between MINETE, national bodies, and local community leaders (including youth) to streamline decentralized execution.</li> <li>? Institutionalize monitoring via local communities to support MINETE's field-level execution and prevent delays.</li> </ul>
Fiduciary	Low	<p><b>Mismanagement and/or inefficient use of funds.</b></p> <p>UNDP will ensure compliance with GEF and UNDP guidelines at all times during the project cycle. Work plans, budget estimates and procurement plans will be prepared and approved annually. Furthermore, close coordination and communication with the executing agency and national counterparts will be on a regular basis through both national and local project steering committees and other meetings and information exchange sessions.</p>

Stakeholder	Low	<p><b>Relevant stakeholders are not engaged and/or committed towards the project.</b></p> <p>Lack of stakeholder engagement can cause misalignment, poor communication, and resource constraints, leading to delays and budget overruns.</p> <p><b>Possible mitigation measures</b></p> <p>Active involvement, clear communication, and engagement strategies are essential to mitigate this risk. Measures include developing and curating a comprehensive Stakeholder Engagement Plan during PPG, informed by comprehensive and appropriate stakeholder mapping and consultations, to identify key national and local stakeholders and implement effective engagement strategies tailored to different groups. Moreover, the establishment of a stakeholder group acting as a platform to exchange knowledge, experience and mostly progress made under the project, including with broader global stakeholders, will help to maintain engagement and commitment of local, national and global stakeholders.</p>
Other	Low	<p><b>Possible challenging gender dimensions at local level may impact the effective implementation of activities</b></p> <p>As both women and men are involved in ASGM sector and would be concerned, and women are particularly vulnerable to mercury exposure with related health risks. Gender-blind interventions may affect the effectiveness of activities and local ownership beyond the project, as most affected groups may be excluded.</p> <p><b>Possible mitigation measures</b></p> <p>Develop a gender-responsive communication plan during the PPG by an expert, informed by a comprehensive gender analysis, to ensure that gender considerations and indicators are considered, including throughout all activities.</p>
Overall Risk Rating	Substantial	<p>Considering the assessment provided above, the overall project risk is rated as substantial. During the full design (PPG) phase, further risks analysis will be conducted to identify potential risk and their mitigation measures. To prevent such risk, close monitoring and constant communication will ensure appropriate risk management and adaptation.</p>

### 5.7 Qualitative assessment

a) Does the project intend to be well integrated, durable, and transformative?

b) Is there potential for innovation and scaling-up?

**c) Will the project contribute to an improved alignment of national policies (policy coherence)?**

**Secretariat's Comments**

4/6/2026 Yes. The project shows strong integration and sustainability by combining biodiversity, land restoration, and livelihoods within a single landscape approach, supported by existing institutions and substantial government co-financing. Its integrated design linking governance, eco-restoration, and mercury-free livelihoods offers transformative potential and scope for scaling. These strengths are evident in the narrative, though they could be sharpened by more explicitly highlighting innovation, durability, and scaling pathways in a concise qualitative assessment

**Agency's Comments**

**UNDP Response, April 27, 2026**

We are grateful for this positive feedback from the GEF secretariat. The PIF has been refined to more clearly highlight innovation, sustainability, and scaling pathways, including the integrated landscape approach, strong institutional anchoring with government co-financing, and mechanisms to enable replication within Côte d'Ivoire and beyond. We have added this paragraph in the section of Alternative scenario and GEF incremental reasoning:

*The project's integrated landscape management approach is innovative in its deliberate linking of governance reform, ecosystem restoration, and mercury-free livelihoods within a single territorial framework. Rather than addressing biodiversity loss, land degradation, and mercury pollution in isolation, the project pilots coordinated regulatory, technical, and livelihood interventions at the landscape level. Durability is ensured through strong institutional anchoring within existing national and decentralized structures, reinforced by substantive government co-financing and alignment with ongoing national programs. Scaling will be supported through piloted regulatory instruments, knowledge platforms, and demonstrated economic viability of mercury-free and nature-positive practices, creating clear pathways for replication within Côte d'Ivoire and across comparable contexts.*

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

**6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?**

**Secretariat's Comments**

4/6/2026. The PIF shows broad alignment with GEF-8 focal area strategies and Côte d'Ivoire's national priorities, adopting a multi-focal approach that addresses land degradation and biodiversity with co-benefits for climate adaptation and chemicals management. However, alignment would be strengthened in relation to land degradation neutrality (LDN) and biodiversity mainstreaming. The project should be more clearly anchored in Côte d'Ivoire's voluntary LDN targets, including consideration of a stronger focus on LD-2 (landscape restoration) depending on the LDN analysis, while CI 4.3 could suffice if CI-2 is not applied. Consistent with the evolving LD focal area, restoration across degraded forests, agricultural systems, and mining-affected landscapes is appropriate. For the biodiversity component, clearer justification of global biodiversity significance is needed for the Ahoua (4,500 ha) and

Ab'anou (21,025 ha) Classified Forests; alternatively, the project could focus on a single land degradation objective, with corresponding adjustments to the indicative focal area elements.

#### Agency's Comments

UNDP response, April 27, 2026

We appreciate the GEF SEC's feedback and guidance on the project's contribution to the Land Degradation and Biodiversity focal areas. We have revised the formulation of the project's contribution to the LD and BD focal areas accordingly, recognizing that the primary contribution is to the Land Degradation focal area. We believe that the project's contribution to the BD focal area, grounded in the biodiversity significance of both classified forests, will be more clearly informed during the PPG phase.

**Land Degradation (LD):** The project will contribute to LD objective 2 to reverse land degradation through restoration of production landscapes. In this regard, the project is anchored in Cote d'Ivoire's voluntary LDN targets to restore 100% of its degraded lands and increase forest cover to 20% by 2030. By focusing on LD-2, the project will implement integrated landscape restoration in the N'Zi region, specifically targeting the Ahoua (4,500 ha) and Ab'anou (21,025 ha) forests, and adjacent ASGM-sites and agricultural lands for achieving national Land Degradation Neutrality in this region. The project will also support land users and communities in the project area to adopt practices that facilitate transitions towards agroecological approaches to land use and production.

**Biodiversity (BD):** While degraded by logging and agriculture, the Ahoua (4,500 ha) and Ab'anou (21,025 ha) Classified Forests represent critical remnant ecosystems within the forest-savanna transition zone. Their global significance stems from their function as vital ecological refuges and stepping-stone corridors for regional species amidst rapidly converting landscapes. To safeguard these habitats, the project aligns with GEF-8 BD Objective 1 and Cote d'Ivoire's NBSAP by mainstreaming biodiversity into the ASGM and agricultural sectors. By transforming local production practices to be nature-positive, degradation-free and mercury-free, the project mitigates the direct drivers of habitat loss and protects these last remaining ecological refuges.

**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's Comments

4/6/2026 Yes. The project is anchored in Cote d'Ivoire's national policy framework, supporting the NBSAP, Land Degradation Neutrality targets, the NDC under the UNFCCC, and the Minamata National Action Plan for ASGM. By aligning with these strategies, the PIF demonstrates policy coherence and ensures that GEF support is aligned with both national priorities and global environmental commitments.

#### Agency's Comments

UNDP response, April 27, 2026

We appreciate this positive feedback from the GEF Secretariat

**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's Comments

4/6/2026 Yes. The PIF identifies eight relevant Kunming/Montreal Global Biodiversity Framework targets (3, 7, 10, 11, 14, 16, 22, and 23) to which the project contributes and briefly explains the linkages for each.

## Agency's Comments

UNDP response, April 27, 2026

We appreciate this positive feedback from the GEF Secretariat

### 7 D. Policy Requirements

#### 7.1 Is the Policy Requirements section completed?

Secretariat's Comments 4/6/2026 Yes. The PIF adequately addresses GEF policy requirements on safeguards, gender equality, stakeholder engagement, and accountability, providing the necessary confirmations and explanations. As already acknowledged, key safeguard and implementation instruments, including a Gender Action Plan, a Stakeholder Engagement Plan, and an Environmental and Social Management Framework and Plan, will need to be developed by CEO endorsement.

## Agency's Comments

UNDP response, April 27, 2026

We acknowledge this comment and it will be addressed during the PPG development.

#### 7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?

Secretariat's Comments 4/6/2026 Yes. The PIF includes a list of stakeholders consulted during the PIF development. Additional details should therefore be provided during project design, including a clear and inclusive engagement strategy for IPLCs. This includes which stakeholders were consulted in project design, including the names of civil society organizations, indigenous peoples, local community groups and associations. Please also provide a summary of the findings of the consultations and the expected roles of key stakeholder groups related to project components and outputs.

## Agency's Comments

UNDP response, April 27, 2026

We acknowledge this comment and more details will be provided at CEO endorsement request.

### 8 Annexes

#### Annex A: Financing Tables

#### 8.1 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's Comments

4/6/2026 Yes. The PIF includes a detailed GEF Financing table requesting USD 2,676,856 in GEF grant (excluding fees). The Agency Fee of USD 254,301 (9.5%) is correctly calculated, bringing total GEF funding to USD 3,040,657.00 million including the PPG.

Agency's Comments

UNDP Response, April 27, 2026

We appreciate this positive feedback from the GEF secretariat.

**Focal Area allocation?**

Secretariat's Comments

4/6/2026 Yes. Allocations of USD 2.25 million from BD STAR (BD?1) and USD 0.426 million from LD STAR (LD?1)

Agency's Comments

UNDP Response, April 27, 2026

We appreciate this positive feedback from the GEF secretariat.

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

Secretariat's Commentsn/a

Agency's Comments

**SCCF A (SIDS)?**

Secretariat's Commentsn/a

Agency's Comments

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

Secretariat's Commentsn/a

Agency's Comments

**Focal Area Set Aside?**

Secretariat's Comments n/a

Agency's Comments

**8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?**

Secretariat's Comments 4/6/2026 Yes. The PIF requests a PPG of \$100,000 (with \$9,500 Agency Fee)

Agency's Comments

UNDP Response, April 27, 2026

We appreciate this positive feedback from the GEF secretariat.

**8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?**

Secretariat's Comments

4/6/2026 Yes. Co-financing totals USD 9,550,000, representing an leverage ratio of approximately 3.6:1 relative to the GEF grant. The sources, amounts, and types of co-financing are documented, including core funds from the GEF Agency, which are expected to be formally confirmed at CEO approval. A higher co-financing ratio could be expected during the CEO endorsement.

Grant is investment mobilized normally. Please revise where the grant is categorized as ?recurrent expenditures? to ?investment mobilized?.

Co-financing resources allocated to PMC represents 2.9% while GEF resources represent 5.0%. For a cofinancing of \$9,274,000, please allocate \$463,700 which represent 5.0% - please amend.

	Sub Total (\$)	2,549,387.00	9,274,000.00
<b>Project Management Cost (PMC)</b>			
	GET	127,469.00	276,000.00
	Sub Total(\$)	127,469.00	276,000.00
	Total Project Cost(\$)	2,676,856.00	9,550,000.00

## Agency's Comments

UNDP Response, April 27, 2026

In line with the guidance provided by the GEF Secretariat, we have revised the grant classification to reflect investment mobilized. We have revised the PMC co-financing, which now represents 5% of the total co-financing, amounting to \$ 477,500.

## Annex B: Endorsements

**8.4 Has the project been endorsed by the country's(ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?**

## Secretariat's Comments

4/6/2026 Yes. The PIF provides the required endorsement information. The Record of Endorsement lists the OFP's name (Ms. Kouadio Sothène Larissa, in her capacity as Interim Permanent Secretary and GEF OFP in the Ministry of Finance and Budget) and the date (03/26/2026) of endorsement. However, the latest version of the Letter of Endorsement (LoE - attached) presents figures that are wrong calculated, hence the figures in Portal are incorrect. For instance, BD STAR allocation is \$2,188,878 - the correspondent Agency fee (9.5%) is \$207,943 instead of \$229,772 as shown in the letter. Therefore, the Total for BD STAR allocation is \$2,534,791 instead of \$2,556,620. **A new LoE is required** - also, the figures in Portal must be adjusted accordingly. When resubmitted, we will review the LoE and figures in Portal and provide comments if appropriate.

Source of Funds	GEF Agency	Focal Area Source	Amount (in US\$)				Total
			GEF Project Financing	GEF Project Financing Agency Fee	Project Preparation Grant (PPG)	Project Preparation Grant (PPG) Agency Fee	
GEFTF	UNDP	BD STAR	2,188,878	229,772	126,000	11,970	2,556,620
GEFTF	UNDP	LD STAR	414,272	43,487	24,000	2,280	484,039
<b>Total GEF Resources</b>			<b>2,603,150</b>	<b>273,259</b>	<b>150,000</b>	<b>14,250</b>	<b>3,040,659</b>

## Agency's Comments

UNDP Response, April 27, 2026

We have revised the LoE to reflect on the correct figures. The revised LoE has been uploaded to the GEF portal.

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

Secretariat's Comments 4/6/2026 Yes. However, a new LoE is required to reflect the budget allocations in the portal

Agency's Comments

UNDP Response, April 27, 2026

We have revised the LoE to reflect on the correct figures. The revised LoE has been uploaded to the GEF portal

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

Secretariat's Comments 4/6/2026 Yes.

Agency's Comments

**8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?**

Secretariat's Comments n/a

Agency's Comments

**Annex C: Project Location**

**8.6 Is there preliminary georeferenced information and a map of the project's intended location?**

Secretariat's Comments 4/6/2026 Yes. The PIF provides georeferenced information for the project intervention areas.

Agency's Comments

**Annex D: Safeguards Screen and Rating**

**8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?**

Secretariat's Comments

4/6/2026 Yes. The UNDP Social and Environmental Screening (SES) pre-screening document is attached. However, the overall risk classification is ambiguously as 'High or Substantial,' and a single classification should be selected before finalizing the PIF. Based on the risk matrix, which rates most risks as Moderate with one Substantial risk and proposes credible mitigation measures, an overall classification of 'Substantial' appears appropriate.

In addition, clarify any feedback received from Indigenous Peoples during PIF preparation and confirm that Free, Prior, and Informed Consent (FPIC) will be obtained during the PPG phase. The project should ensure that Indigenous Peoples' and local communities' governance systems, capacity building needs, and traditional and local knowledge are systematically integrated across relevant project components, that Indigenous Peoples' beneficiaries are appropriately identified and disaggregated where applicable, and that project activities contribute, where feasible, to strengthening tenure security for Indigenous Peoples and local communities. More specifically, please consider addressing the following :

1. In the stakeholder engagement section mentioned that the project will have engagement with Indigenous Peoples (PIF, page 39). Please clarify whether the project has identified any impacts on Indigenous Peoples and engagement with Indigenous Peoples so far.
2. This project is classified as substantial environmental and social risk project. Please clarify how the project is consulted with Indigenous Peoples and local communities, small scale farmers and other vulnerable populations about project concept (PIF), particularly related to Component 1 and 2 related land use and land use conflicts, and how the results of the consultations were integrated into the project concept (PIF).
3. Please ensure identifying and engaging wide range of stakeholders using target project areas including seasonal and temporary users of the areas during PPG. Please also ensure conducting thorough consultations with key stakeholders and developing robust mitigation measures including alternative livelihoods for key stakeholders including Indigenous Peoples and local communities based on consultations during PPG.
4. Please also ensure integrating mitigation measures and environmental and social action plans as a part of project activities (particularly Component 2) with clear budget and timeline during PPG.
5. Please ensure the project obtained free, prior and informed consent (FPIC) from Indigenous Peoples about project design during PPG and throughout project implementation and monitoring, if the project areas used or occupied by Indigenous Peoples.
6. Please consider Indigenous Peoples and local communities, small scale farmers and other vulnerable populations as partners of the project particularly Component 1 and 2.
7. Please consider integrating Indigenous Peoples and local communities' governance, traditional and local knowledge, capacity building as a part of the project, particularly in Component 1 and 2.
8. Please consider incorporating monitoring indicators related to integration of traditional and local governance, traditional and local knowledge and capacity building for Indigenous Peoples and local communities in the project during PPG.

## Agency's Comments

UNDP Response, April 27, 2026

1- The N'zi region is home to multiple ethnic groups, notably the Baoul'. These groups are broadly integrated into the socio-economic and cultural fabric of Cote d'Ivoire, and do not meet the criteria for UNDP's Standard 6. Therefore, and based on the initial consultation conducted during the PIF stage, it appears that there are no indigenous peoples in the project's intervention area and Standard 6 has not been triggered. Only local communities will be involved in this project. However, the project will conduct further stakeholder mapping at PPG stage including a human rights risk analysis based on UNDP's Human

Rights-Based Approach (HRBA) Toolkit<sup>(1)</sup> to better understand potential risks to the rights of vulnerable/marginalized groups (e.g., youth, immigrant miners) in the target landscape.

2- As part of the preliminary consultations conducted along the sidelines of the International Exhibition of Extractive and Energy Resources (SIREXE) event, 93 local stakeholders were consulted, including traditional chiefs, religious leaders, presidents of women's and youth associations, representatives from Boor and Akpokro communities (notably women and youth), landowners, local actors from the Sub-Prefecture of Diangokro. During the PPG phase, potentially affected communities will be engaged to assess the extent of resource use in the designated areas, the extent of impacts on livelihoods and to co-design appropriate mitigation measures. The stakeholder analysis to be done at PPG stage will include a conflict analysis related to competing uses of natural resources (mining, agriculture, forestry), land tenure and governance, and the drivers of conflict between the various actors in the ASGM sector.

3- As part of the baseline assessments to be done during the PPG phase, the project will conduct a preliminary livelihoods assessment to characterize the current livelihoods pathways as it pertains to the ASGM sector in the region, dependency on mining, most vulnerable stakeholders, impacts on the use and access to natural resources. Preliminary analysis of implications of the creation of community-based forest and riparian conservation agreements on local livelihoods. Based on the results of these analyses, a Livelihoods Restoration Plan/Framework will be developed during the PPG phase and included in the ESMF as appropriate.

4- During the PPG, SES risks associated with each of the proposed activities will be more clearly defined, based on information gathered in the baseline assessments and on consultations with stakeholders. The results of these assessments will be reflected in an Environmental and Social Management Framework (ESMF) which will be one of the key outputs of the PPG. The ESMF will outline steps for further assessment and mitigation measures required under implementation, including their costs in the project's total budget.

5- FPIC was not applied during PIF development as no indigenous groups have been identified in the project area so far. However, the comprehensive Stakeholder Engagement Plan (SEP), to be developed during the PPG phase, will include specific engagement strategies for each of the identified vulnerable/marginalized groupings, and other categories of stakeholders.

6- The Stakeholder Engagement Plan (SEP), to be developed at PPG phase, will include adapted engagement and consultation strategies to ensure effective participation of all stakeholders' groups.

7- The stakeholder analysis to be conducted during the PPG stage will document customary land use practices and community-level governance structures. This information will be integrated into the project's design.

8- Indicators related to integration of traditional and local governance, traditional and local knowledge, and capacity building for Local Communities will be integrated into the overall M&E framework of the project.

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[1] <https://www.undp.org/publications/human-rights-based-approach-development-programming-hrba-toolkit>

## Annex E: Rio Markers

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

#### Secretariat's Comments

4/6/2026 Yes. The project has appropriately applied the Rio Convention markers. If Land Degradation is confirmed as a principal objective, as noted in earlier comments, the Rio markers and the 'Indicative Focal Area Elements' table should be revised accordingly. In addition, the 'Private Sector (TBC)' tag should be updated to reflect confirmed private sector involvement. Also consider revising the value 1 for Rio Marker - CCM - this project does not target CCM, neither there is any value in Core Indicator 6.

#### Agency's Comments

UNDP Response, April 27, 2026

We have revised the Rio Convention Marker to reflect Land Degradation as the main objective of this project. In line of your recommendation, we have removed the CCM score, as shown in the table below:

Climate Change Mitigation	Climate Change Adaptation	Biodiversity	Desertification
SCORE : 0	SCORE : 1	SCORE : 1	SCORE : 2

We have also tagged the Private Sector marker (8) to confirm private sector involvement in this project.

Were the following stakeholders consulted during project identification phase:

Indigenous Peoples and Local Communities?  Yes  No  
Civil Society Organizations?  Yes  No  
Private Sector?  Yes  No (Consultation with the private sector will be done during the PPG phase)

#### Annex F: Taxonomy Worksheet

##### 8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments 4/6/2026 Yes. The PIF taxonomy worksheet is comprehensive

Agency's Comments

#### Annex G: NGI Relevant Annexes

**8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.**

Secretariat's Comments n/a

Agency's Comments

#### 9 GEFSEC Decision

##### 9.1 Is the PIF and PPG (if requested) recommended for technical clearance?

Secretariat's Comments

4/6/2026. The use of Cote d'Ivoire's remaining STAR allocation for this GEF project is welcome, with the project aiming to place 25,525 ha under improved forest management, bring 100,000 ha under sustainable land use practices, and reach 29,400 direct beneficiaries

Agency's Comments

UNDP response, April 27, 2026

We thank the GEF Sec for this positive feedback.

**9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval**

Secretariat's Comments 4/6/2026. During project preparation and prior to endorsement, the PIF should provide additional detail on stakeholder consultations undertaken to inform project design, including the roles of the private sector, local communities, and relevant civil society organizations, and how these stakeholders will be engaged throughout project development and implementation. The stakeholder analysis should clearly explain how consultation results are reflected in project components and outputs, and how meaningful engagement with vulnerable populations and Indigenous Peoples will be ensured during implementation. In addition, once the gender analysis and Gender Action Plan are completed, their findings and actions should be systematically integrated into project components, outputs, and activities, with indicative budget allocations. Monitoring and evaluation arrangements should also ensure that MTR and TE reporting captures gender-specific results and progress on GAP implementation.

Agency's Comments

UNDP Response, April 27, 2026

We acknowledge the GEF Secretariat's comment. Additional detail on stakeholder consultations, engagement mechanisms, integration of gender analysis and the Gender Action Plan, sex-disaggregated indicators and data, including data on youth, IPs and LCs, as relevant, and M&E arrangements will be developed and fully addressed during the PPG phase to ensure robust and inclusive project design and implementation at CEO endorsement.

Review Dates	PIF Review	Agency Response
<b>First Review</b>	<b>3/12/2026</b>	
<b>Additional Review (as necessary)</b>	<b>4/6/2026</b>	
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		

To approve a single suggestion, mouse over it and click on suggestion [Click here to accept all suggestions in the sentence](#)