



Plastic Reduction in the Oceans: Sustaining and Enhancing Actions on Sea-based Sources (PRO-SEAS)

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

11166

Countries

Global (Jamaica, Costa Rica, Kenya, Vanuatu)

Project Name

Plastic Reduction in the Oceans: Sustaining and Enhancing Actions on Sea-based Sources (PRO-SEAS)

Agencies

FAO

Date received by PM

6/26/2024

Review completed by PM

7/11/2024

Program Manager

Taylor Henshaw

Focal Area

International Waters

Project Type

FSP

**PIF
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

8th of July 2024 (thenshaw): Partly:

- (1) Please add Jamaica to list of participating countries in the General Project Information section. GEFSec IT can support if change cannot be made manually by Agency.
- (2) Taxonomy: Please explain why TDA and SAP preparation are tagged. This project does not include a set of activities for such preparation. In general, there are keywords tagged that do not seem to represent the project. Please check each keyword to ensure it matches the project scope. Remove tangential keywords.
- (3) Please leave field blank for "Project Sector" (CCM Only).
- (4) Please see co-financing comments. Co-financing figure in front matter (and elsewhere, including allocations in project structure table, may need to be adjusted based on responses to comments).

8th of November 2024 (thenshaw):

- (1) Addressed.
- (2) Addressed.
- (3) Addressed.
- (4) Addressed.

20th of November 2024 (thenshaw):

- (1) Addressed.

Agency Response

FAO 19 November

Thanks for adding Jamaica

FAO 28 October

- 1) We cannot edit the field of the countries to add Jamaica. See screenshot hereunder.

Part I: Project Information

GEF ID 11166	Project Type FSP
Type of Trust Fund GET	
Project Title Plastic Reduction in the Oceans: Sustaining and Enhancing Actions on Sea-based Sources (PRO-SEAS)	
Countries Global, Costa Rica, Kenya, Vanuatu	Agency(ies) FAO,
Executing Partner International Maritime Organization (IMO)	Executing Partner Type Others

- 2) TDA/SAP removed from taxonomy. This was added by mistake in the first submission.
- 3) "Project Sector (CCM Only)" left blank
- 4) The co-financing letters and classification has been reviewed accordingly to the comments made by GEF Sec and to the information provided by the co-financiers (see sections below). Figures have been checked and updated as appropriate.

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

Secretariat comment at CEO Endorsement Request

8th of July 2024 (thenshaw): Partly:

- (1) This project targets Core Indicators 5 and 8. Please explain why the Rio Marker for BD is marked "No Contribution" and not 1 or 2. It is noted in the document that "PRO-SEAS contributes to the

conservation of biodiversity through the prevention and reduction of the impacts associated with plastic pollution."

8th of November 2024 (thenshaw): Addressed.

Agency Response

FAO 28 October

(1) The Rio Marker for BD is marked as 1. The marker was not triggered on the first submission by mistake.

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?

Secretariat comment at CEO Endorsement Request

8th of July 2024 (thenshaw): Partly:

(a + b) No:

(i) The GEBs in terms of Core Indicators are missing. Please provide the targeted figures. Please note high CI5 target, which needs to be reduced considerably. See Core Indicators section of review sheet.

(ii) Please explain the scaling up strategy/model and why these four countries were selected for this approach to deliver GEBs. Why are these four countries, as pilots, centres of transformation for this issue? Please capture in the summary why this is an International Waters project. In other words, why is a "global scope" approach taken here and not focusing on multiple countries sharing one LME, which would more appropriately target Core Indicator 7.

*Please mention the targeted LMEs in the summary.

(iii) Please, in a few sentences, summarize what the incremental cost reasoning for this project is.

8th of November 2024 (thenshaw):

(i) Addressed.

(ii) Addressed.

(iii) Addressed.

***Please adjust "\$7.1 million PRO-SEAS project to \$8 million in the summary, or remove figure, as the total GEF financing amount is \$8M, not \$7.1M.**

20th of November 2024 (thenshaw): Addressed.

Agency Response

FAO 19 November

The project grant has been adjusted to \$8 million in the summary,

FAO 28 October

- i. The GEB in terms of Core Indicators have been added at the end of the Project Summary.
- ii. Specific text has been added to the Summary. The text explains that at PIF stage it was agreed with the GEF Sec TM (Leah Karrer) to work on a global project with pilots in countries selected as centers of transformation on the SBMPL issue due to their exhibited leadership and ownership around SBMPL-initiatives at national and regional scales during the GloLitter Partnerships project, including in the Pacific and Indian Oceans and Caribbean Sea, and their respective LMEs, as well as their expressed interest and commitments to this project, and sharing lessons learned regionally and globally. The global scope of this project is needed in order to address SBMPL issues in a meaningful way, due to the transboundary (and trans-LME(s)) nature of the problem.
- (iii) A short paragraph summarizing of the incremental reasoning has been added into the summary.

3. Project Description Overview

- a) **Is the project objective statement concise, clear and measurable?**
- 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?**
- c) **Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?**
- d) **Are the GEF Project Financing and Co-Financing contributions to PMC proportional?**
- e) **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

8th of July 2024 (thenshaw):

- (a) No. The current objective reads "To reduce sea-based marine plastic litter (SBMPL) from the shipping and fisheries sectors, particularly in selected Large Marine Ecosystems (LMEs) Indicator

OB1: Number of countries engaged in regional and/or global partnerships. Indicator OB2: Number of countries where policies/initiatives supported by the project were adopted or are in process of being adopted/negotiated. Indicator OB3: Satisfaction score of direct stakeholders." Please remove indicators from objective field. They should be in project framework only. "To reduce SBMPL from the shipping and fisheries sector, particularly in selected LMEs" is not a full objective. Please include what this reduction will lead to. Please align with theory of change.

(b) Partly:

(i) Please see below comment on KM and outputs

(ii) The allocation to Component 3 of \$912,750 seems low for the level of ambition, which includes supporting business ventures and projects to address SBMPL. Please confirm how many projects are being considered here and whether this mismatch will actually achieve GEBs.

(iii) "**Output 1.1.1:** National Action Plans (NAPs) to address SBMPL in selected countries updated" has been changed from PIF, which included NAP implementation. Please explain why the on-the-ground action has been dropped.

(iv) "**Output 2.1.2:** Port Waste Management Plans (PWMP) developed in coordination with relevant competent authority to facilitate implementation" has been adjusted to remove concrete implementation aspect. Please explain why the on-the-ground action has been dropped.

(v) Output 2.1.3 no longer seeks to mobilize investment to upgrade and/or establish PRF systems to sustainably manage SBMPL in selected countries. This is one of the compelling elements of this investment and should be reconsidered. Removing so seemingly makes the project quite a bit less ambitious and impactful. Given the 60 month project implementation window, and the \$3M+ allocated to this component, it seems likely that bankable studies and then investment mobilized, especially through the good private sector participation in the project, can be achieved. We need to strive for more ambition here.

(vi) Output 3.1.2. It is not clear what is meant in the output phrasing by "Gender-responsive SBMPL business ventures identified and supported in selected countries". "Developed" was removed from the PIF language. It is hard to reconcile how supported does not equal developed/developing. Please explain.

(c) Partly:

(i) M&E: The Component 4 figure in the overview table is not congruent with the budget table. Please disaggregate M&E costs from Component 4 totals in budget table. The budget for M&E (\$365,000), which does not seem justifiable given the listed activities in the budget table. \$180,000 for steering committee training and travel, \$73,000 for a midterm evaluation and \$73,000 for a terminal evaluation (and an additional \$18,000 to produce the accompanying report) is not a good use of resources. Please revise budgets down and move excess to other components.

(ii) KM: The output is "Project results, experiences, lessons learned and recommendations for successful implementation of effective SBMPL management measures documented, disseminated, and promoted" reads as an outcome. What are the actual project activities for knowledge management? Please list them in the project overview framework.

(d) Yes, but please see several co-financing comments below, which may affect the proportionality if the co-financing total figure needs to be adjusted in response to comments.

(e) Yes

8th of November 2024 (thenshaw):

(a) Addressed.

(b)

(i) Addressed.

(ii) Addressed.

(iii) Addressed.

(iv) Addressed.

(v) Addressed.

(vi) Addressed.

(c)

(i) Addressed.

(ii) Not addressed. Component 4 outputs are still not defined in the project overview table. Specific outputs must be listed and numbered (4.1.1., 4.1.2 etc). Please revise.

(d) Addressed.

20th of November 2024 (thenshaw): Addressed.

Agency Response

FAO 19 November

More information has been added to the description of outputs 4.1.1 and 4.2.1. in the project overview table.

Component 4: Increasing knowledge and awareness of SBMPL and potential solutions to reduce and eliminate SBMPL among key stakeholders.	TA	Outcome 4.1: Increased knowledge of measures, options and incentives to effectively manage, reduce or eliminate SBMPL increased among key stakeholder groups (fishing and shipping industry). <i>Indicator 11: National authorities' knowledge on Marpol Annex V and FAO VGMFG.</i>	<u>Output 4.1.1:</u> Project results, experiences, lessons learned and recommendations for successful implementation of effective SBMPL management measures documented, disseminated, and promoted, including development of a project KMC Plan, project visual identify, project-generated knowledge and communication products, and project roadmap for scaling up project results and successful solutions, and participation in IW:Learn activities and events.	GET	1,076,831.00	5,905,004.00	 
Add New							
Monitoring and Evaluation (M&E) 							
M&E	TA	Outcome 4.2: Effective project implementation based on adaptive management and lessons learned. <i>Indicator 12: % of mid-term review recommendations fed back into project implementation.</i>	<u>Output 4.2.1:</u> A gender-sensitive project M&E system designed and operational, including : establishment of the Project Steering Committee (PSC); organization of the inception workshop; enforcement of regular monitoring of project indicators; and reporting on project results. <u>Output 4.2.2:</u> Independent Mid-term Review and Terminal Evaluation undertaken with results fed back to project management.	GET	365,447.00	2,952,503.00	 
Add New							

FAO 28 October 24

a)

The OB were removed from the objective field and included in the project framework only. The OBs were also updated to be more clear and respond to other comments of this review.

The objective was aligned with the one approved at PIF stage., i.e. "To reduce sea-based marine plastic litter from the global shipping and fisheries sectors, particularly in target LMEs". However, in response to the specific comments we added a few words to explain what this reduction will lead to. Hence the new objective reads as: "To reduce sea-based marine plastic litter from the global shipping

and fisheries sectors, particularly in target LMEs, leading to the reduction of direct and indirect impacts from plastics in the marine environment".

The objective in the ToC was align with the ProDoc.

It is important to highlight that, despite the new wording of the objective, the inclusion of specific indicators to measure reduction it is not possible because a baseline does not exist. This statement was clearly included in the PIF proposal and it is based on the research conducted by the GESAMP.

Please also note that the indicator to measure the reduction of the SBMPL is not yet globally available despite the efforts of the international community, as evidence by SDG indicator 14.1.1(b) - *plastic debris density in which both IMO and FAO act as partner agency*. This indicator is still classified as tier II i.e., data not regularly produced by countries, and does not have sub-indicators/standards to identify the source of origin. While global estimates on the share of SBMPL exist, they are neither annually released nor disaggregated by sector, country, and ecosystem. Therefore, the project could not feasibly adopt and/or develop SMART indicators to measure reduction in SBMPL from the fisheries and shipping sectors, even less so in selected LMEs.

Even if metadata and/or methodologies were widely available (there are not) and/or easily adaptable, this objective indicator still would lack the R (relevant) and the A (achievable/attribution) to be SMART. In summary, it would hold the project accountable for something it cannot realistically achieve given the nature of its activities and deliverables, available capacities, stakeholders involved, and timeframe. Likewise, it is worth noting that the project's deliverables aim to influence the early stages of the policy cycle ? not policy implementation ? and that policy processes are complex, dynamic, multifactorial, long-term and sensitive to contextual factors (e.g., all countries will have general elections in between 2025 and 2026). Therefore, the project could achieve remarkable results by its completion and yet be poorly evaluated if SBMPL ? a major challenge for sustainable development ? is not reduced.

b)

i.

addressed below in the KM section.

ii.

Re to Component 3 and its associated budget: Indicator 10 for Outcome 3.2 and Output 3.2.1 both acknowledge that additional financial contributions will be received from shipping and fishing industry GIA members, which will be used to identify and implement projects to address SBMPL under Outcome 3.2, Output 3.2.1. These contributions from the business sector, through public-private partnerships established under the GIA, will further support the ambition of this Component, particularly under Outcome 3.2, not only through additional financial contributions, but also through direct support and engagement from the business sector in supporting new business ventures to address SBMPL, as well as further developing and amplifying the impact from existing business ventures.

In addition to the activities that will be identified and supported by the GIA under Output 3.2.1, outlined above, the Work Plan in Annex D (uploaded in the roadmap of the submission both as part of the ProDoc in FAO template and as standalone file), identifies 15 specific main activities that are under consideration and will be reconfirmed at inception phase: 6 in Costa Rica, 3 in Jamaica, 2 in Kenya and 4 in Vanuatu, which are inclusive of identification of incentives to support investment in addressing SBMPL and communicating these options with relevant stakeholders, and identification and support for SBMPL business ventures in the selected countries.

The combination of the direct engagement of the business sector through the GIA-associated output along with the dedicated Component 3 project activities under consideration in the selected countries including their associated regions and LMEs, together ensure diverse support at the local, national, regional, LME and global levels, for the development and promotion of practical opportunities and incentives for the environmentally sound management of SBMPL. The promotion of these practical opportunities and incentives for sound management of SBMPL from the local to global scales achieve the global environmental benefits associated with sound SBMPL management (e.g., reduced adverse marine environmental impacts, reduced entanglement and death of marine wildlife including threatened and endangered species, reduced ingestion by marine biota of SBMPL including bioaccumulation of plastics and associated chemicals in the marine food chain, reduced losses of target and non-target species through ghost fishing, reduced damage to fragile marine habitats) through practical interventions both on-the-ground in project-supported countries and regions, as well as globally, particularly through the engagement from the Global Industry Alliance.

iii.

On-the-ground action has not been dropped. The PRO-SEAS builds on the national proposals developed by the countries during the PPG stage. The project will address the national priorities with the view of replication on the regional level and global level. Annex M (uploaded in the roadmap of the submission both as part of the ProDoc in FAO template and as standalone file), Table 1 Summary of changes in project design between the PIF and Project Document notes that the wording of this output was revised following feedback by reviewers to make the project's activity for this Output clearer. The changes in text were made to reflect the need to first update existing NAPs prior to supporting implementation as possible/required, in alignment with project components, outcomes and outputs. During the PPG stage the countries developed their national proposals with some activities prioritized that were not included in the NAPs at the time when those were developed under the GloLitter Partnerships project. Therefore, by the time the project begins, the NAPs will be outdated in some areas, progress will have been made on the priorities identified by the countries since finalization of their NAPs, and national priorities may have shifted. Moreover, NAPs update is required to incorporate linkages to national waste management operations and ensuring gender mainstreaming where required, and adoption of the updated NAP by the NTFs to ensure governments' commitment to its implementation. Therefore, NAPs must be updated to reflect the national context and the priorities identified in the national proposals, to ensure there is one comprehensive NAP that will be used to track the national progress in addressing SBMPL, including the national activities listed in the PRO-SEAS proposal.. Following the NAPs being updated under Output 1.1.1, implementation will be supported by the project as required as prioritized by the countries and in alignment with project components, outcomes and outputs.

Noting the comment by the GEF-Sec however, to avoid any misinterpretation that on-the-ground action (i.e., support for implementation) has been dropped, in addition to the support for NAP implementation outlined in the Project Document, below, the following text has also been added to the project document for clarification around Output 1.1.1:

- Project description overview - Text for Output 1.1.1 revised to: **“National Action Plans (NAPs) to address SBMPL in selected countries updated, with identification of activities and priorities that would benefit from project support for implementation in alignment with project components, outcomes and outputs?”**
- Project Components, Component 1, Output 1.1.1 description: Title of output updated, per above. The sentence **“The NAP updates will also include identification of activities and priorities that would benefit from project support for implementation, in alignment with project components, outcomes and outputs?”** was also added to reflect this support for implementation, following required updates.
- Annex C Results Framework: Description of Output 1.1.1 updated, as above.

Additional information around implementation of the NAPs by the project in the project document was also added in ProDoc. Namely:

- Under the Project Rationale, section 3 on Barriers, at the end of Table 1, the Project Document notes that: **“*In terms of the four countries participating in the PRO-SEAS project, all four also need to update their SBMPL Country Status Assessments and NAPs (see Table 1) considering the progress made in the countries on the implementation in both shipping and fisheries sectors, identifying short-, medium- and long-term priorities, including new dates for the NAPs validity and implementation as in case of Costa Rica, Vanuatu, and Jamaica. The revised NAPs will need to also take into consideration and incorporate linkages to the national waste management operations, which has not been addressed before, and ongoing relevant SBMPL-related regional activities funded by other organizations.* NAPs additionally need to be updated to ensure that gender, where practicable, is mainstreamed into these instruments”** (see section B2, end of 2nd paragraph)

The implementation of NAPs is additionally supported in various areas throughout the project document. This includes:

- Project summary, point 1: **“Project components also support the implementation of SBMPL National Action Plans (NAPs) including facilitating national, regional and global coordination and collaboration mechanisms for SBMPL management.”**
- Project Rationale, ii. Current initiatives to address SBMPL: **“The PRO-SEAS project will support implementation of existing National Action Plans (NAPs) to address SBMPL that were developed under GloLitter, including establishing environmentally sound SBMPL management systems in selected ports and SBMPL monitoring and reporting schemes.”**
- Project rationale, section 4, notes that the project **“offers the four countries the opportunity to receive assistance in implementation of the NAPs developed under the GloLitter, and look at the management of the SBMPL at the national level.”**

- Project rationale, section 6 notes: "At the national level, the PRO-SEAS project has been specifically designed to support the implementation of priorities identified in each of the National Action Plans to address SBMPL (NAPs) in Costa Rica, Jamaica, Kenya, and Vanuatu, developed under the GloLitter project."
- Project rationale, section 7: "The PRO-SEAS project will support implementation of existing National Action Plans (NAPs) to address SBMPL that were developed under GloLitter, including establishing environmentally sound SBMPL management systems in selected ports and SBMPL monitoring and reporting schemes."
- Section B3 around stakeholders further emphasizes that the four national governments engaged with the project "will also implement their SBMPL NAPs supported by the project focusing on legal and policy reform and institutional structures which will also address work/actions from other government agencies besides the shipping and fishing agencies (such as coast guard service)."
- Section B7: "The PRO-SEAS project particularly responds to supporting the implementation of priorities identified in each country's National Action Plans (NAPs). All four countries have National Action Plans (NAP) to address sea based plastic, although these Plans are in various stages of completeness (some will need revising and updating during the lifetime of the project), and none have been fully implemented and need capacity strengthened to do so."
- Section B9: "Building on the the GloLitter results PRO-SEAS project will support implementation of the existing National Action plans (NAPs developed under GloLitter) to address SBMPL (project Component 1), including establishing environmentally sound SBMPL management systems in selected ports (Component 2)."
- Annex F (uploaded in the roadmap of the submission both as part of the ProDoc in FAO template and as standalone file), Part A: "strengthen NAPs and support their implementation that would include national budgetary support".

vi.

On-the-ground action has not been dropped and concrete implementation has not been removed. As noted in Annex M (uploaded in the roadmap of the submission both as part of the ProDoc in FAO template and as standalone file), ii. Summary of changes from the PIF, Table 1, "the wording of the output was revised and shortened to make it clearer." PWMPs cannot be implemented without first being either developed or adequately updated as required. Many of the ports in the four countries supported, as well as more broadly across the associated regions/LMEs, do not have any PWMPs, or, in the cases that they do exist, these plans often require updating for relevance and adequacy, including to effectively address SBMPL. **The updated text not only specifies ensuring the (necessary) development of these plans, but also coordination with the relevant authority to facilitate implementation of the plans.** It should also be noted that implementation of the plans is the responsibility of the relevant authority and often the authority is not government, but private entity. Therefore, the project will provide technical assistance with the development of the PWMP to those port authorities who expressed their commitment to implementation of the PWMP recommendations. The narrative and description for this output remains consistent with, as well as nearly exactly maintains, the original PIF narrative and description in ProDoc's section *B1. Project*

approach and Theory of Change. The primary changes that were made included an additional three sentences at the end of the previous PIF description (still included) which were provided for further clarity around this output, particularly around the need to develop the PWMPs in the first place. The Work Plan in Annex D provides additional description of eight Main Activities under consideration for this output, including ensuring the effective implementation of the PWMPs and waste reception facilities in ports.

v.

The ambition hasn't scaled down if compared to the PIF. During the PPG stage, the Output has been elaborated on to ensure required steps are taken to achieve this objective. Output 2.1.3 in PIF stated: Investment mobilized to upgrade and/or establish PRF systems to sustainably manage SBMPL in target countries followed by description: The project will assist in the development of bankable proposals for investment to upgrade or establish PRF systems for effective SBMPL management in target countries. The project will actively seek collaboration with international financial institutions (IFIs) and private sector to support the establishment and operation of efficient waste management systems.

During the PPG stage the Output has been reworded, because Technical-economic studies are prerequisite to identifying potential investments. However, the description of the output still includes the commitment to support the countries in establishing cooperation with financial institutions, specifically the proposal states: The project will assist in the development of these technical-economic studies of the potential for investment to upgrade and/or establish PRF systems to sustainably manage SBMPL in the beneficiary countries. The project will support the countries in approaching international financial institutions (IFIs) and private sector bodies to support the establishment of sustainable, efficient SBMPL management systems. This activity will be executed in coordination with the Blue Ports Initiative (BPI) and the proposals will be presented to relevant Government, private sector and international financial institutions (IFIs) in each project region (e.g. the African Development Bank, Inter-American Development Bank) and/or potential bilateral donors (e.g. Norad, GIZ).

As noted in Annex M (uploaded in the roadmap of the submission both as part of the ProDoc in FAO template and as standalone file), ii. Summary of changes from the PIF, Table 1, discussions with key project partners and National Focal Points (NFP) from the four countries during the PPG period highlighted the need to reformulate this output given that mobilization of investment to upgrade and/or establish PRF systems for SBMPL management is outside of the scope of the PRO-SEAS project scope, including the capacity of committed project partners at the national, regional and global levels. Additionally, these technical-economic feasibility studies are a prerequisite for the mobilization of investments for PRFs, as they serve to meaningfully identify, inform and prioritize investment mobilization. Furthermore, the original statement provided at the PIF stage was at the outcome, rather than output, level. During the PPG stage, participating countries specifically identified and requested support under this Output for 5 main activities to be considered in Costa Rica, Kenya and Vanuatu, which include requests for project support for these technical-economic studies and facilitated discussion with international financial institutions and the private sector to support the establishment of effective SBMPL management systems based on the outcomes of the

study findings. The revised output is thus more realistic in accordance with project partners and NFP capacities, expectations and communications for support required regarding PRFs.

The description of Output 2.1.3 in ProDoc's section *BI. Project approach and Theory of Change* further highlights that in the four participating countries, responsibility for funding the construction of PRFs lies with the Government (e.g., under the relevant ministry of public works, port authorities, blue economy, others) with limitations in government finance often requiring concessionary arrangements with the private sector. In order to best effectively assist with the mobilization of investments for PRF developments and/or upgrades from relevant international financial institutions (IFIs) and the private sector in collaboration with the relevant national Government agency/ies, technical-economic feasibility studies are first required to realistically identify national needs and priorities for these investments, including what is practical, possible, and where efforts are most needed and/or best directed to specifically address SBMPL. This consideration has been added to the narrative in the project document for further clarity around the importance of this need and focus of this output, prior to mobilizing the investment itself. Following completion of these studies, including investigations into the applicability of related incentives to encourage the utilization of the PRFs targeted, the project document still highlights project support to countries to approach IFIs and private sector bodies, in coordination with project partners, to support the national PRF priorities and need identified.

In direct response to the comment by GEF-Sec regarding the possibility that the 60-month project window and \$3M+ allocated to this component could support bankable studies followed by mobilized investment, it is worth noting that Component 2 is inclusive of 2 Outcomes with 5 Outputs, including this Output 2.1.3. which also includes 5 proposed main activities from participating countries for consideration, as noted above. The other outputs under Outcome 1 (including conducting gap analyses for PRFs and developing PWMPs along with facilitated implementation where possible), as well as Outcome 2, which includes support for SBMPL monitoring and assessment systems (Output 2.2.1) and support for SBMPL prevention and reduction technologies and tools (Output 2.2.2) will also require substantial resource investments (both financial and time, as well as commitment from project partners) within the identified project scope. Because of the shared resource allocation under Component 2, the revised text for Output 2.1.3 was proposed to realistically achieve and support the aims of this Output and Outcome under this component, as outlined above.

vi.

The word "supported" was removed and replaced by "developed", following the associated comment in the previous GEF-Sec review, and for consistency with the language used in the PIF. This has been updated to the project document in all areas where this output is referenced (project description overview, section 10 around project components, Annex C and Annex D Work Plan).

However, please note that regardless the wording, the ambition hasn't scaled down if compared to the PIF. The revised wording was used to be concise in the definition. PIF states on Output 3.1.2: New gender-responsive incentives (financial, regulatory, operational) for SBMPL management developed and promoted among key stakeholder groups (fishing and shipping industry) in target

countries. Proposal states on Output 3.1.2 Gender-responsive SBMPL business ventures identified and supported in selected countries.

The description of the output in the proposal is detailed and ambitious. Please refer to p. 37 of the proposal that provides detailed interventions regarding gender responsiveness.

c)

i.

The M&E budget of USD 365,447 represents 5.4% of the project budget. We recall that M&E is an important part of the project cycle and as such needs to be adequately resourced.

Please note that the costs associated to the MTE, TE, and the final report have been revised to be aligned with what is required by the Independent Evaluation Office of FAO and IMO. The valued included in the budget are in line with other FAO and IMO projects already approved by the CEO. With regard to the costs associated with the PSC, it should be noted that this is a global project and therefore global, regional and national stakeholders will be brought together for the meeting. The budget allocated is absolutely logical and instrumental to support the travels/organisation/venue/facilities of the minimum 5 meetings that will be organised during the course of the project. It should be noted that in the IMO budget codes, miscellaneous includes publications, hence the USD 18,000 allocated for PSC miscellaneous. These funds will be used to support reports and publications related to the project steering meetings.

The M&E table in annex G of the FAO CEo Endorsement Template has been updated to reflect the new budget values of USD 365,447

ii.

Please refer to Output 4.1.1 description that provides the list of activities related to knowledge management, specifically it states:

Key activities include: (i) development of a project Knowledge Management (KM) and Communication Strategy; (ii) project-generated knowledge and communication products developed and shared through available knowledge-sharing platforms and processes to facilitate exchange of lessons, best practice, and expertise generated during project implementation, including information packages, media packs; (iii) a project-specific ?visual identity?; (iv) a structured lesson-learning framework designed and applied to the project with regular reviews of project results (tied to the project?s M&E plan); (v) engagement with IW:LEARN, and (vi) roadmap for scaling up project results and successful solutions for reducing and managing SBMPL in shipping and fisheries sectors nationally, regionally (LME), globally developed and promoted, particularly though engagement with the IW:LEARN platform.

d)

The issues of the co-financing letters have been fixed and figures updated as needed. No issue with the proportionality.

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

8th of July 2024 (thenshaw):

(a)

(i) Please include the GloBallast, GloMEEP and GloFouling projects in the baseline (model approach?), as at least the KM component will build of these, according to the document.

(ii) The baseline section includes a box 3 on the GloLitter project that is pasted in the wrong location in the narrative. Please adjust placement to avoid reader confusion.

(iii) Please include the drivers, which are summarized in the theory of change in the agency project document but not in the CEO document.

(b)

(i) Please include the Annex J Stakeholder Analysis and list of stakeholders and their roles in the project (annex 1 to annex J) (in a condensed format) in the CEO document.

(ii) Please explain the Global Industry Alliance in the context of the private sector's role as a stakeholder.

(c) N/A

8th of November 2024 (thenshaw):

(a)

(i) The Glo-X model is understood, but should be reflected in the baseline section of the document itself. Please incorporate as a box or footnote.

(ii) Addressed.

(iii) Addressed.

(b)

(i) Addressed.

(ii) Addressed.

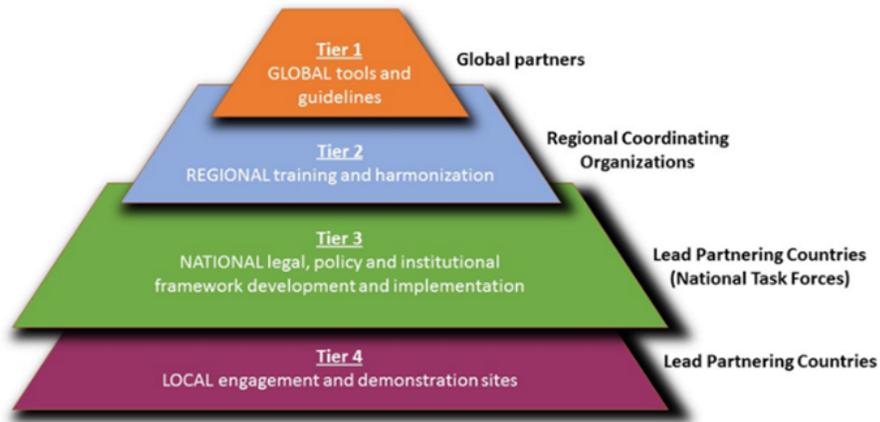
20th of November 2024 (thenshaw):

(i) Addressed.

Agency Response

FAO 19 November

The following figure explaining the IMO-GLO-X process has been added to the text in the baseline section before Box 3.



FAO 28 October 24

a)

(i)

All IMO implemented that are of a global nature, including GloBallast, GloMEEP, GloFouling, and GloLitter projects apply ?Glo-X? model implementation strategy. The strategy includes at its core the Legal, Policy and Institutional Reform (LPIR) that needs to be implemented in order to pave the way for the effective use of resources.

In all these projects, this LPIR and implementation process has the capacity building, knowledge sharing and technology solutions at its center. In the Glo-X model, usually the LPIR process is applied in a 3-tiered approach at the global, regional and national level. In some projects like the Glo-Fouling, the Glo-X model has been adapted to integrate the local dimension using a 4-tiered implementation approach as described below and this approach is suggested to be applied in the PRO-SEAS:

1. A global tier, providing international coordination and information dissemination, developing toolkits, guidelines and training materials, providing capacity building to developing countries and establishing a strong cooperation between different stakeholders.
2. A regional tier, providing regional coordination and harmonization, and promoting information sharing.
3. A significant country tier that ensures that beneficiary countries commit to develop/update and implement National Action Plans, with a view to guide the adoption of LPIR.
4. A local tier in each country to provide practical experiences in the implementation of the tools developed by the Project through targeted demonstration sites that should facilitate engagement of stakeholders at the national level and provide opportunities for technology demonstration.

ii.

Box 3: GloLitter Partnerships project - the key baseline project for the PRO-SEAS project is in this position because the GloLitter project is mentioned for the first time in the paragraph preceding the box. For this reason we believe the position is correct and therefore propose to leave it in this part of the document.

iii.

A box with the drivers has been added below the ToC.

b

The table listing the stakeholders and their roles in the project has been added in the portal submission.

ii.

Please refer to the description of the Outcome of 3.2 on p. 38 that describes the details of the GIA and private sector industry role. Specifically, it states: "IMO will bring together maritime and fisheries industry leaders with a view to develop innovative solutions that can support the sector to prevent and reduce marine plastic litter and to address common barriers to the uptake and implementation of technologies, alternative approaches and operational measures. The GIA is expected to consist of a wide spectrum of maritime stakeholders, including shipowners, ports, fishery industry, recycling companies, technology and data providers, and class societies. Typical GIA activities will include industry roundtables, development of guidance and tools to support reduction, reuse, recycling and prevention of plastic litter discharge into seas, raising awareness of potential sustainable solutions. The GIA will not engage in the development of policies and regulations (which is the prerogative of IMO Member States), is technology neutral and does not engage in commercial activities. However, activities developed by the GIA will, on a regular basis, reported to IMO bodies such as the Marine Environment Protection Committee (MEPC) for their information and action as appropriate

The CEO document also provides further text on GIA: The PRO-SEAS project will particularly engage private sector through the Global Industry Alliance (GIA) on SBMPL led by IMO in partnership with FAO where major private companies involved with shipping and fisheries, join efforts to address SBMPL. GIA involves companies which are willing to bring their resources, expertise and support to work towards the reduction and/or sustainable collection, recycling, repurposing or disposal of ship-based and wider marine litter. Examples of such organizations include fishery companies, shipping companies, cruise industry, port authorities, waste management organizations, plastics industry supplying the shipping and fisheries sectors, etc.

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) 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?

c) 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?

d) 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?

e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?

f) 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?

g) 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)?

h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately

described within the components?

i) 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?

j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?

l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

8th of July 2024 (thenshaw):

(a)

(i) Please include keys for assumptions and drivers below the theory of change diagram so the reader does not need to refer to a portal annex.

(ii) Revised project objective should match theory of change objective language.

(b) Yes

(c) Yes

(d) Yes

(e) Yes

Please note that the socioeconomic benefits section includes "Mobilization of new finance sources supported to assist with reduction and recycling of SBMPL", yet Output 2.1.3 and 3.1.2 have seemingly been scaled down in ambition. Please review/revise accordingly.

(f) Please see several budget comments later in review sheet.

(g) Yes

(h) Yes

(i) Partly, please address following regarding gender:

Please ensure the active participation of women, women's organizations, and gender experts in the National and Regional coordination mechanism (e.g., Outputs 1.2.1, 1.2.1)

Please clarify how much budget has been allocated for the GAP and for each of its components, and where that amount is listed in the project budget.

Please ensure during project implementation, that the PIRs, the MTE and the TE include an analysis and review of all dimensions of the GAP and relevant gender dimension of the project.

(j) Yes, but please include budget and anticipated timeline for delivery of relevant km/comms outputs.

*Agency has noted: "We confirm that an approach to Knowledge Management and Learning has been clearly described during Project Preparation in the Project Description and that these activities have been budgeted and an anticipated timeline for delivery of relevant outputs has been provided.," but the latter is not present.

(k) Yes

(l) Yes

8th of November 2024 (thenshaw):

(a)

(i) Addressed.

(ii) Addressed.

(i) Addressed

(j) Not addressed. Please include budget and anticipated timeline for delivery of relevant km/comms outputs in the CEO Endorsement Document.

Example below (Caribbean BlueFin project):

Table 11. Knowledge Management (KM) relevant outputs and activities

Component	Outputs	Activities	Expected Results
Component 2: Enabling systems created and supported in order to facilitate Private Sector Participation in Caribbean Blue Economy and Business opportunities.	Output 2.1.1: Incentives and interest created in Blue economy and business opportunities targeting at least 2 economic sectors that have impacts on marine and coastal ecosystems	Activity 2.1.1.1: Create a regional working group (WG) with private and public sector representatives to discuss needs and opportunities in the region for facilitated dialogues	<p>(Y2 Q4) At least 3 private sector representatives, preferably from different economic sectors, are participating in the project regional WG</p> <p>(Y2 Q4) At least one national dialogue in each project country and two regional dialogues are carried out</p> <p>(Y2 Q4) At least 5 regional and national private sector organisations (3 in each project country) are engaged by the project dialogues</p>

Component	Outputs	Activities	Expected Results
	Output 2.1.2: Engagement is facilitated with governments and other governance / coordination mechanisms in targeted economic sectors to discuss enabling conditions and policies for the blue economy	Activity 2.1.2.2: Provide recommendations for governments and other governance/ coordination mechanisms on how to improve the ease of doing business in the Blue Economy index in each country and regionally	(Y2 Q4) At least 3 government agencies or other governance coordination mechanisms are participating in the project regional WG (Y2 Q4) At least 5 government agencies (one from each project country) are participating in the project facilitated dialogues
Component 3: A regionally based Blue Economy Hub developed to provide socioeconomic opportunities which support marine and coastal conservation and sustainable use	Output 3.1.1: The Caribbean Blue Economy Hub is designed and made available online showcasing Information on business opportunities	Activity 3.1.1.1: Design the Caribbean Blue Economy Hub to be a clearinghouse mechanism on Blue Economy business opportunities in the Caribbean	(Y2 Q4) Caribbean Blue Economy Hub is designed, available online and accessible from the CBF website.
		Activity 3.1.1.2: Develop an online portal and database to register opportunities	(Y3 Q2) At least 40 Blue Economy business opportunities (new technologies, enterprises seeking investments, and case studies) identified and registered in the Caribbean Blue Economy Hub
		Activity 3.1.1.3: Populate the Hub with opportunities collected with CBF partners, through the facilitated dialogues and from other databases, such as the TNC Mapping Ocean Wealth project	(Y3 Q2) At least 4 economic sectors with case studies or opportunities registered in the Caribbean Blue Economy Hub
	Output 3.1.3: The Caribbean Blue Economy Hub is updated regularly, promoted through the project activities and its contribution to promoting new interventions is assessed.	Activity 3.1.3.3: Develop study to assess the contribution of the information collected through the Blue Economy Hub to the implementation of interventions in the region (new partnerships, new projects, new research, new investments)	(Y4 Q4) At least 20% increase in number and 5% increase in diversity (sectors) of stakeholders using the Caribbean Blue Economy Hub at the end of the project, considering targets for Y3 Q4 as the baseline (Y4 Q4) At least 10 new opportunities registered in the Caribbean Blue Economy Hub in year 3 and Year 4 (Y4 Q4) At least 1 of the 10 opportunities registered in year 3 and 4 are transformed into interventions
Component 4: Socialising, scaling, and replication of the BluEFin approach regionally.	Output 4.1.1: Knowledge sharing and learning activities delivered through a Caribbean Community of	Activity 4.1.1.1: Establish a network/ working group of Caribbean organisations working on conservation finance (mailing list, shared online drive)	The Caribbean Community of Learning in Conservation Finance is launched and active

Component	Outputs	Activities	Expected Results
	Learning in Conservation Finance	Activity 4.1.1.2: Carry out knowledge sharing and learning workshops to socialise the contents and results of the BluEFin project	At least 20 organisations engaged of at least 3 different categories (conservation trust funds, funds and government entities)
		Activity 4.1.1.3: Produce case studies and factsheets about the interventions and financial mechanisms supported by the project	
		Activity 4.1.1.4: Present the project knowledge products at international conferences	
Total Budget for Knowledge Management Plan			

20th of November 2024 (thenshaw): Addressed.

Agency Response

FAO 19 November

A table describing the anticipated KM products and estimated budget has been added in the CEO endorsement request under the section B6.Knowledge generation, management and exchange.

Kindly note that the budget associated to the KM activities, like any other activities of the project, will have to be re-confirmed with the countries at inception and 1st PSC phase

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a)

- i. The keys for assumptions and drivers have been added below the theory of change diagram
- ii. The ToC has been updated to make sure everything is consistent with the result framework.

b)

Please see the replies regarding Outputs 2.1.3 and 3.1.2 to GEF-Sec comments 2bv and 2bvi, respectively. These responses and associated revisions apply here, including the explanation of how the outputs have not been scaled down in ambition, and how they maintain support for facilitation of the mobilization of finance sources to assist with reduction and recycling of SBMPL described under these outputs.

f)

Please see the response to align the budget session

i)

The Project will ensure that active participation of women is promoted and encouraged. Please refer to GAP paragraph 4 stating: *?. In this context, is important that PRO-SEAS promotes and facilitates, where possible, representation of men and women on any existing or new mechanisms established under the project?.* Please also refer to the proposal section B2. Gender ? fit with Gender Equality and Women?s Empowerment stating: *?. For example, under Component 1, the project will encourage and facilitate the participation of women and men in national cross-sectoral coordination and collaboration mechanisms for addressing SBMPL management mechanisms, including mechanisms established by the project, such as Working Groups and /or Technical Committees on SBMPL.*

Re to the budget, the GAP doesn?t have components per se; it has recommended actions on integration of gender considerations in the project activities. Those actions have been considered when developing PRO-SEAS components and mainstreamed across all the components. Please refer to the proposal section B2. Gender ? fit with Gender Equality and Women?s Empowerment that describes how each component of the project will ensure gender considerations.

PRO-SEAS is a project of a specific technical nature addressing marine plastic litter issues. The project?s primary goal is to provide technical assistance to the countries to address marine plastic litter issues; and the role of women is carefully considered and promoted over the life of the project, but is not the primary goal. Components 1,2 and 4 are technical that include establishing a task force, updating the NAP, developing tools and other that one cannot allocate specific % of the budget to women, as again, women participation will be promoted and encouraged and only during the implementation it will be possible to report on the proportion of the funds that can be attributed to women participation.

The Project will have the Gender advisor supporting all the components of the project ensuring the GAP actions are implemented through the project activities (please refer to the salary allocated for

this role in the budget). Also, please note that the Component 3 has specific activities targeting women that are listed in the budget, copied below for easy reference.

3.1.1 - Incentive Consultants (Costa Rica, Jamaica, Kenya and Vanuatu): 53,460

3.1.2 - Gender Activity (Costa Rica, Jamaica, Kenya, Vanuatu): 33,480

3.1.1 - Incentive Consultants (All Countries) Travel: 26,730

3.1.2 - Gender Activity (All Countries) Travel: 66,960

3.1.1 - Incentive Consultants (All Countries) Training: 89,100

3.1.2 - Gender Activity (All Countries) Training: 217,620

3.1.1 - Incentive Consultants (All Countries) - Knowledge Management and Communication (Sundries=publications in IMO budgeting code): 8,910

3.1.2 - Gender Activity (All Countries) - Knowledge Management and Communication (Sundries=publications in IMO budgeting code): 16,740

re to the gender dimension in the PIRs, the MTE and the TE. The project will ensure that this happens. Please note that as elaborated in the proposal, a gender-sensitive project M&E system will be designed and operational.

Kindly note that in general IMO, as UN Agency, is required to ensure gender mainstreaming and equality. Therefore, per the IMO gender policy, each PRO-SEAS component will be assessed, gender markers assigned and M&E system in place to ensure gender empowerment and equality to the extent applicable and feasible considering the nature of the activities.

j)

Please refer to the proposal Output 4.1.1 that lists the key activities related to knowledge management. In addition, please also refer to the proposal Section B6. Knowledge generation, management and exchange that elaborates on the KM activities and how those will be coordinated through Component 4 whose principal focus is to raise awareness of the impacts of SBMPL. As stated in the document a core element of Component 4 will be the development of a Knowledge Management and Communications (KMC) Strategy and Plan and this will be done at the initial stages of the project that will inform the timeline of the delivery on the KM related activities. However, please refer to proposal Annex D - Work Plan that provides estimated timeline of the activities, including those related to KM.

Regarding the budget for KM:

The project has dedicate advisor on KM and Component 4 has specific focus on KM (please refer to the description and the budget)

As presented in the proposal the project's KM approach will place particular emphasis on stakeholder engagement through workshops and trainings (please refer to the Training budget)

Please refer to the specific budget line items that fall under the KM category, as IMO classifies any communication materials, including developments or knowledge management as 'Sundries':

1.2.1 - National Coordination Mechanisms (Jamaica) Knowledge Management and Communication (Sundries)

1.2.2 - Regional Coordination Mechanisms (Costa Rica) - Knowledge Management and Communication (Sundries)

2.1.1 - MPL Management - PRFs (All Countries) - Knowledge Management and Communication (Sundries)

2.1.2 - Port Waste Management Plans (All Countries) - Knowledge Management and Communication (Sundries)

2.1.3 - Techno-Eco. Feasibility (Costa Rica, Kenya, Vanuatu) - Knowledge Management and Communication (Sundries)

2.2.1 - Monitoring & assessment systems (All Countries) - Knowledge Management and Communication (Sundries)

2.2.2 - Technologies (All Countries) - Knowledge Management and Communication (Sundries)

3.1.1 - Incentive Consultants (All Countries) - Knowledge Management and Communication (Sundries)

3.1.2 - Gender Activity (All Countries) - Knowledge Management and Communication (Sundries)

4.1 Opening and Closing Workshops - Knowledge Management and Communication (Sundries)

4.1 Regional Fisheries Workshops x 2- Knowledge Management and Communication (Sundries)

4.2 Project Steering Committee - Knowledge Management and Communication (Sundries)

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.).

Secretariat comment at CEO Endorsement Request

8th of July 2024 (thenshaw)

(a) Partly. Please see comments in budget section regarding PCU arrangements and address those comments under that section in the review sheet.

(b) N/A

(c) Yes

8th of November 2024 (thenshaw): See budget section below.

Agency Response

FAO 19 November

Responded in the budget section below.

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a)

Comments addressed under the budget and PMU arrangements section.

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)?

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

8th of July 2024 (thenshaw):

(a) Partly.

(i) For Core Indicator 9, please include the 9.8 sub-target of 6,000 mt in the total for the Core Indicator. The total currently reads "0.00". As stated in PIF, more explanation is needed on the methodology/calculations used to identify 6,000 mt. Please describe.

(ii) For Core Indicator 7, in the yearly PIRs GEF Sec would like to see how this Core Indicator is/was truly realized. On its face, this project, with four participating countries across the globe, only includes one shared ecosystem (Caribbean Sea LME - Jamaica, Costa Rica) that is eligible. But it is understood the nature of the project will improve LME-wide management based on a pilot/scaling approach. Please ensure the LME-wide results are documented and reported.

(b) For Core Indicator 5, the target of 143,000,000 ha is not reasonable and achievable. The value has increased 40 times in compared to PIF value. Please revise down to PIF target proposed + Jamaica. See GEF Sec comment at PIF stage.

8th of November 2024 (thenshaw):

(a)

(i) Addressed.

(ii) Addressed.

(b) Addressed

Agency Response

FAO 28 October 24

The 6,000 mt have been indicated under sub-target 9.8 (see screen short below). The portal does not report automatically this amount in the total for the Core Indicator. Kindly note **we cannot** edit this value manually. This looks like an issue of the Portal

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)
6,000.00	6,000.00		

◀ Back Save Cancel

The explanation on the methodology/calculations used to identify 6,000 mt for CI9 updated in the project document.

For ease reference the description it is also provided here: Estimate calculated by targeting 80% return of plastic litter generated onboard major industrial and artisanal fishing vessels in Costa Rica, Jamaica, Kenya and Vanuatu to PRFs that will be disposed of in an environmentally sound manner. 80% was chosen as a target for return to ensure focus on PRFs in major national fishing ports and select fishing landing sites in the project countries where associated capacity building activities will occur, noting that, in many cases, PRFs do not exist at many small-scale artisanal fisheries landing sites and existing PRFs are often inadequate. To determine total plastic litter generated onboard the fishing vessels, average vessel-level estimates of annual volumes of plastic waste generated from industrial and artisanal fisheries in Latin America were used as a proxy for vessels in the four project countries (noting that this data is unavailable in the project countries) and were multiplied by total numbers of industrial and artisanal fishing vessels in Costa Rica, Jamaica, Kenya and Vanuatu. The national industrial and artisanal fishing vessel numbers were reported by countries in their SBMPL Country Status Assessments and National Action Plans developed under the GloLitter project.

Sources: Molina, G. No publicado. Componente 3: Caracterizaci?n y estimaci?n de los residuos generados por el sector pesquero y acu?cola, su diversidad de entidades y actividades involucradas, con la descripci?n del enfoque actual de su gesti?n. Consultor?a de Apoyo para analizar la generaci?n y gesti?n de residuos del sector pesca y acuicultura y su transici?n hacia modelos de econom?a circular. Banco Interamericano de Desarrollo, Ministerio De Medioambiente, Chile. Molina, G. 2024. Consultor?a de Apoyo para analizar la generaci?n y gesti?n de residuos del sector pesca y acuicultura y su transici?n hacia modelos de econom?a circular. Coquimbo, Chile. resources.get SBMPL Country Status Assessments and National Action Plans: www.glolitter.imo.org/resources.

ii.

The EA and IA will ensure that, during the course of the project, all activities and results achieved that would create a GEB for the LME(s) targeted by the project are well documented and reported.

b)

Target has been revised back down to final PIF target proposed + Jamaica. Noting the GEF Sec comment at PIF stage, please note that the final PIF target proposed represented the total inshore fishing areas of the 3 countries in km². The methodology provided at the end of the CI table in the CEO document, reflects the same methodology as that in the final PIF stage, with Jamaica now included. The updated target with Jamaica is presented here in hectares however rather than km² to ensure consistency with GEF-required units. The description of the methodology has similarly been revised back to the methodology presented in the PIF-stage, with these changes reflected.

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
8th of July 2024 (thenshaw):

- (a) Yes
- (b) Yes
- (c) Yes

Agency Response
FAO 28 October 24

OK

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 Request N/A

Agency Response N/A

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?

Secretariat comment at CEO Endorsement Request 8th of July 2024 (thenshaw): Yes

Agency Response
FAO 28 October 24

OK

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 8th of July 2024 (thenshaw): Yes

Agency Response

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OK

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

8th of July 2024 (thenshaw): Please bring summary of corresponding annex into CEO Document.

8th of November 2024 (thenshaw): Addressed.

Agency Response

FAO 28 October 24

A text summarizing the contribution of the project to targets of the Kunming-Montreal Global Biodiversity Framework has been added in the section B. PROJECT DESCRIPTION - Global environmental benefits which would not have accrued without the GEF project (additionality).

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request

8th of July 2024 (thenshaw): Yes, but please address the following:

(1) Under Stakeholder consultation "Other (Please explain)" has been tagged "Yes", yet there is no associated explanation. Please include or remove tag.

(2) Please respond "Yes", under socioeconomic benefits, in addition to the detailed list.

(3) Private sector stakeholders should be specifically identified in the document. Please bring forward from stakeholder analysis.

8th of November 2024 (thenshaw):

(1) Addressed.

(2) Addressed.

(3) Addressed.

Agency Response

FAO 28 October 24

- 1) The "Other (Please explain)" tag was selected by mistake. It has been removed.
- 2) We added a sentence to confirm that "Yes" was considered and described socioeconomic benefits.
- 3) Private sector stakeholders have been brought forward from stakeholder analysis.

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request 8th of July 2024 (thenshaw): Yes (Annex K in Agency Project Document)

Agency Response

FAO 28 October 24

OK

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request 8th of July 2024 (thenshaw): Yes (Annex J in Agency Project Document)

Agency Response

FAO 28 October 24

OK

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request 8th of July 2024 (thenshaw): Yes

Agency Response

FAO 28 October 24

OK

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 8th of July 2024 (thenshaw): Yes

Agency Response

FAO 28 October 24

OK

Focal Area allocation?

Secretariat comment at CEO Endorsement Request

8th of July 2024 (thenshaw): Please clarify:

(1) IW 1-2 is selected, but isn't this investment targeting both sustainable blue economies (IW 1-1) and advancing sustainable fisheries management (IW 1-2). Please consider a split across the two sub-objectives.

8th of November 2024 (thenshaw): Addressed.

Agency Response

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Done (see screenshot below)

A. FOCAL/NON-FOCAL AREA ELEMENTS

Programming Directions	Focal Area Outcomes	Trust Fund	GEF Project Financing(\$)	Co-Financing(\$)	
IW-1-2	International Waters	GET	3,552,968.00	33,503,663.00	 
IW-1-1	International Waters	GET	3,552,968.00	33,503,664.00	 
+ Add New		Total Project Cost(\$)	7,105,936.00	67,007,327.00	

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement Request N/A

Agency Response N/A

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement Request N/A

Agency Response N/A

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

Secretariat comment at CEO Endorsement Request N/A

Agency Response N/A

Focal Area Set Aside?

Secretariat comment at CEO Endorsement Request N/A

Agency Response N/A

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

8th of July 2024 (thenshaw): No, please address following:

(1) "UN to UN agreement with IMO (specialized agency expertise, technical input and assistance in the development of the project document)". Please describe what this is and why \$90,000 of the \$200,000 PPG funds were allocated to and spent on this line item.

(2) Please explain how the \$10,000 spent for financial analyst advanced the project preparation.

(3) Please explain what the outputs of the fisheries, shipping and waste management consultancies (\$50,000) are and how they contributed to the project design.

8th of November 2024 (thenshaw)

(1, 2, 3) Please revert to previous PPG table. New table is not properly itemized.

It is still not clear why half the PPG amount went to IMO, as there were consultants to prepare the project, including a lead design expert. Is the explanation saying that \$90,000 of PPG was spent on IMO salaries during the PPG stage to support project preparation? \$90,000 on technical expertise to "contribute" to the Pro Doc seems excessive and unwarranted without itemization. Please explain/account.

20th of November 2024 (thenshaw): Addressed.

Agency Response

FAO 19 November

FAO has included a new version of the table in the format we always use in our submission. This is based on our accountability system, i.e. the lines we extract from our IT platform when monitoring the use of PPG or other funds.

The new table has three lines:

- Line 1 relates to the INTERNATIONAL consultants directly hired by FAO specifically for the PRO SEAS preparation phase.
- Line 2 relates to the PPG transferred from FAO to IMO through a UN-to-UN agreement. IMO used the full amount of funds to hire 4 NATIONAL experts (one for each country) and a GENDER expert to prepare the GAP for the project. The five experts were specifically hired by IMO for the PRO SEAS preparation phase.
- Line 3 covers stationery, transport, communication and printing.

FAO 28 October 24

The PPG budget was uploaded with several errors. We apologise for this. A new version is now available in the resubmission. See the comments:

1) The UN inter-agency agreement is the legal instrument used by all UN agencies to transfer funds between them. The USD 90,000 was transferred to IMO to provide staff, time and technical expertise to support the PPG phase. This is standard practice for GEF projects. Either we use the PPG to hire consultants/experts to contribute to the preparation of the ProDoc or, as in this case, we use specific technical expertise available in the already identified Executing Agency. IMO was clearly identified as the EA for this project at the PIF stage and approved as such by the GEF Council.

2) The USD 10,000 were used by an expert consultant to help IMO and FAO to develop the project budget and to assess the costs of the activities. The lines has been included under staff in the revised PPG table uploaded in the portal.

3) The international experts in fisheries, shipping and waste management were hired by FAO to assist in collecting relevant technical information and data from the participating countries and their respective regions, with the aim of contributing to the development of the project document. This is what FAO always does: hire international or national experts with PPG funds. The lines has been included under staff in the revised PPG table uploaded in the portal.

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 8th of July 2024 (thenshaw): Yes

Agency Response

FAO 28 October 24

OK

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

8th of July 2024 (thenshaw): No, please address the following:

(1) Of the \$62 million in co-financing for this project, only about \$2.4 million (under 4% total) is investment mobilized. This is not an acceptable ratio. Please explain why there is such little investment mobilized for this project.

(2) On the flip side, 96% of the co-financing for this project is in-kind/recurrent expenditure, including extremely large in-kind contributions of \$27 million from ISSA, \$11 million IMO, \$5.3 million FAO, \$8 million SPREP etc. These high amounts need to be explained and justified. \$27 million from "in-kind contributions from vessels and industry participants affiliated with ISSA participating companies, consisting of vessel time, equipment purchases, and staff time" does not seem very concrete.

(3) BIMCO: Letter is not dated. A new letter is required with time stamp.

(4) GGGI : Letter is not dated. A new letter is required with time stamp.

(5) IMO: IMO is incorrectly listed as GEF Agency. Please revise.

(6) UNEP: Body of letter states ". The co-financing contribution to the GEF project will be USD 500,000 as an in-kind contribution across the four components of PRO-SEAS", yet the table in the letter states \$600,000. Please seek new letter that clarifies contribution.

(7) WMU: Letter is addressed to GloLitter project manager. Please secure new letter addressed to GEF Agency Senior Coordinator.

(8) OSEAN: Letter is not dated. A new letter is required with time stamp and official letterhead (missing).

(9) ISSF: Letter is not dated. A new letter is required with time stamp. Letter states co-financing will come through salary of Ali and Glazer. Please explain what this is.

(10) ALPESCAS: Letter is not dated. A new letter is required with time stamp and official letterhead (missing).

(11) SPREP: Letter is not dated. A new letter is required with time stamp and official letterhead (missing). It appears the source of these funds are from the Australian government and UNEP, not SPREP. Please clarify if letters should not come from these two entities instead.

(12) SST: Letter is not dated. A new letter is required with time stamp and official letterhead (missing).

(13) WISTA: Letter is not dated. A new letter is required with time stamp.

(14) ISSA: Letter is not dated. A new letter is required with time stamp.

(15) Costa Rica Ministry of Health: What are the in-kind activities? The letter does not specify.

(16) ACEPESA and INCOP: Please confirm "beneficiary" is correct classification.

(17) Costa Rica National Coast Guard. Letter does not include official letter head. A new letter is required.

(18) Kenya Maritime Authority: Letter states \$155,500. Please correct table figure.

8th of November 2024 (thenshaw):

(1) Addressed.

(2) Addressed.

(3) BIMCO: Addressed.

(4) GGGI: Addressed.

(5) IMO: Addressed.

(6) UNEP: Addressed.

(7) WMU: Addressed.

(8) OSEAN: Addressed.

(9) ISSF: Addressed.

(10) ALPESCAS: Addressed.

(11) SPREP: Addressed.

(12) SST: Addressed.

(13) WISTA: Addressed.

(14) ISSA: Addressed.

(15) Costa Rica Ministry of Health: Addressed.

(16) ACEPESA and INCOP: Addressed.

(17) Costa Rica National Coast Guard: Addressed.

(18) Kenya Maritime Authority: Addressed.

Agency Response

FAO 28 October 24

The issues raised by review audit have been addressed for all co-financing letters. This does not affect negatively the total amount of co-financing committed to the project, which .

At the same time, the percentage of investment mobilized has been increased and is now around 40%.

Regarding the co-financing committed by SPREP, the new letter clarifies that the funds will be implemented and managed by the organization, which will therefore report them as co-financing to the PRO SEAS project.

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 8th of July 2024 (thenshaw): Yes

Agency Response

FAO 28 October 24

OK

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

Secretariat comment at CEO Endorsement Request 8th of July 2024 (thenshaw): Yes

Agency Response

FAO 28 October 24

OK

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 8th of July 2024 (thenshaw): Yes

Agency Response

FAO 28 October 24

OK

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?

Secretariat comment at CEO Endorsement Request

8th of July 2024 (thenshaw):

(a) No, please include the targeted GEF Core Indicators in the Project Results Framework

(b) Partly,

(i) The indicators are largely knowledge increased-related (and verified through surveys only?), and not relating to real GEBs. What is actually happening on the ground according to this framework?

(i) "Indicator 3 [regional level]: % of countries engaged in regional events" is not specific. Please revise.

(ii) The Indicator OB1 and OB3 are not SMART. Please revise.

(c) Partly. Please reconsider if more indicators can be sex disaggregated (there are only two).

(d) Yes

*Please include the M&E costed results framework in the CEO document.

8th of November 2024 (thenshaw)

(a) Addressed.

(b)

(i) Addressed

(i) Addressed, but with the removal of Indicator 3 there is now no Indicator 3. Please relabel accordingly.

(ii) Addressed

(c) Addressed. Gender Action Plan document includes a gender mainstreaming results framework for the project. Please see GEF Sec comments for implementation section below.

20th of November 2024 (thenshaw):

(i) Addressed.

Agency Response

FAO 19 November

The labels of the indicators in the Project Results Framework have been update. Thank for spotting the mistake.

FAO 28 October 24

(a) done

(b)

(i) in general we revised results framework indicators per GEF's comments. We followed the GEF indicators guidelines to structure them. Again, these are outcome level indicators and not output level indicators. Outputs are measured in numbers, e.g. number of people or number of meetings that can be verified by the attendance lists, etc. Outcome level is mostly measured by assessments, surveys, reports, etc, as described in the results framework.

(i) on indicator 3. This indicator is proposed to be deleted, as in the revised ProDoc there is another indicator measuring this Outcome.

(ii) On Indicator OB1 and OB3. Both indicators meet the GEF definition of SMART, however, the alternative wording has been included in the revised prodoc, namely:

OB1 is a proxy indicator

Number of countries engaged in regional and/or global mechanisms to enhance policy coherence for reducing SBMPL from shipping and fisheries in the respective LMEs (adapted SDG 17.14.1)

OB3 is a proxy indicator

Revised in the ProDoc to: Extent of use of country-owned national action plans on SBMPL by the Project (adapted SDG 17.15.1)

(c) Outcome 4.1 indicator can be also disaggregated by gender. Text added in the ProDoc results framework table. Please note that PRO-SEAS has Gender Action Plan that will be implemented.

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

8th of July 2024 (thenshaw): Yes

Agency Response

FAO 28 October 24

OK

Annex G: GEF Budget template

8.8 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

8th of July 2024 (thenshaw):

(a) Yes, the budget follows the GEF template.

(b) No.

(i) The M&E component charges for MTR and TE and SC travel and training are too high. Please revise.

(ii) The CTA and technical advisor each receive up to \$239,183 and \$129,256 per year in some years. This is far too high. The CTA position, for example, is 11% of total project resources. Salaries across staff equals 21% of project resources. Please revise down.

(iii) Sundries must be identified. Please revise.

(iv) Please include project manager in CTA title. Only 17% of the CTA's time, according to salary, is allocated to project management. Please explain this rationale. Based on the TOR responsibilities (pasted below), it seems more than 17% should be directed to PMC.

? Exercise overall responsibility for planning, implementation, management and coordination of the project operations and personnel.

? Define and orient the main strategy lines for project implementation in consultation with FAO and the GEF; overseeing preparation and updating of the project work plan, as required.

? Act as Secretary of the PSC meetings, oversee the preparation of project review and/or evaluation meetings; prepare background documents, briefs, issue papers, progress reports for the PSC meetings and for donor reporting; follow up on PSC decisions and recommendations.

? Lead and effectively manage the Project Coordination Unit (PCU), providing feedback, guidance and training opportunities for all PCU members. Lead any recruitment process that may be required after the Project is launched.

? Assure timely implementation of all project activities, including quality control and review of all produced technical outputs.

? Oversee the establishment of the necessary agreements with partners for implementing the activities programmed by the PRO-SEAS project and coordinate the work in the beneficiary countries through the National Focal Points (NFPs).

? Oversee and coordinate the mid-term review and terminal evaluation, the annual budget revisions and potential extension of the Project, and the closure of the Project.

(v) Please explain why \$1,411,554 (about 20% of project resources) is allocated to travel.

**Salaries, travel and M&E = 47% of total GEF resources. Please explain why almost half of the GEF resources for this project are allocated to off-the-ground elements. Is this a good use of project resources?

(c) TORs:

(i) Gender Advisor: TOR states "Lead the technical implementation of the monitoring and evaluation activities of the Project, establishing the tools to monitor progress of project implementation and review achievements in relation to the Project results framework and agreed indicators related to the women engagement in all the activities of the project."; "Lead drafting project progress reports"; "

Please explain why the Gender Advisor salary is not partly charged to M&E for these responsibilities

"Provide integrative and adaptive project coordination support, including the day-to-day operational and contractual matters of the Project, implementation and assessment of progress of each activity under the Project." Please explain why this is not charged to PMC or M&E.

(ii) Technical Advisor. Some aspects of this position, according to the TOR, should be charged to PMC. (No aspects of this position are charged to PMC).

"Supervise the procurement processes for the Project"; "Draft terms of reference for contracting experts and consultants and oversee contractual arrangements. Review and edit consultant reports and provide feedback on performance." "Oversee the development and implementation of project planning and oversee the preparation of related documents/reports (work programme, project budget, etc.)". "? Perform other related duties, particularly in the absence of the Project Chief Technical Adviser (CTA), as required." Please revise.

(iii) See CTA TOR comments above.

8th of November 2024 (thenshaw):

(b)

(i) Addressed.

(ii) The Agency notes that the CTA amount is in line with "other recently approved projects implemented by UNDP and executed by IMO". This is not accurate. The GEF-UNDP GloNoise project (endorsed in June/July 2023), executed by IMO, is a two-year project, but includes a senior CTA with a total budget over two years at \$294,480. Over a four year project, this would amount to \$588,960, which is \$208,316 less than what is proposed for the CTA in PRO-SEAS. While some inflation adjustment is reasonable, it is unlikely that IMO's salary structure has increased so substantially since last year. The PRO-SEAS budget for the CTA therefore must be overstated. Much of this difference should be allocated back to the project activities. Please revise.

\$430k over two years is also not an appropriate use of GEF resources for a technical adviser [\$215,000 per year is far above the typical GEF project senior staff position salary (i.e. UNOPS PROCARIBE+ = project manager/regional technical advisor listed salary is \$137,000 x 5 years)]. In GloNoise, the "second UN position" was recast as a consultancy to bring down the position costs. Please consider the same for this project and allocate the excess back into the project activities.

(iii) Addressed.

(iv) Not addressed. There must be a named project manager for all GEF projects. And the "CTA" position is in fact the manager of the project, according to the ToR in the Portal. Please include "project manager" in the position title ("CTA/project manager", as was done for GloNoise.

(v) Addressed.

(c) Partly addressed. Comment (b)(iv) must be addressed.

20th of November 2024 (thenshaw):

(b)

(ii) Addressed.

(iv) Addressed.

(c) Addressed.

Agency Response
FAO 19 November

ii) The budget has been revised and aligned as much as possible with the GEF SEC request.

Please note the following:

PCU cost reduction is only possible due to other projects contributions of 64% per the below. So, GEF provides 36% of the funding required to manage/deliver this project, so if not for other projects, IMO wouldn't be able to partner with GEF and FAO.

Fully Staffed	TOTAL over 4 years	GEF paying over 4 years	GEF Percentage	Other Projects Contribution
CTA/PM	988,218	563,659	57%	43%
TA	835,339	158,453	19%	81%
G&KMA	473,069	155,708	33%	67%
A	267,119	0	0%	100%
F	267,119	141,869	53%	47%
Totals	2,830,864	1,019,689	36%	64%

Moreover, we would like to draw the attention of the GEF SEC to the following information:

1. IMO staff have invested considerable time and internal resources in developing the PRO-SEAS project to provide much needed assistance to developing countries in addressing the global problem of marine plastic debris.
2. IMO has committed significant in-kind and cash contributions to PRO-SEAS, as detailed in the co-financing letter. These efforts reflect IMO's interest in partnering with GEF and FAO in this new global initiative.
3. As previously communicated and worth repeating, IMO is a specialized agency of the United Nations and the world's leading authority on setting standards for the safety, security and environmental performance of international shipping. The IMO follows its rules and regulations, which cannot be negotiated or questioned by the GEF SEC;
4. IMO also has established project management structures and implementation systems that have proven successful in delivering the expected results and cannot be changed without major impact on delivery.
5. IMO has restructured the composition of the PCU by removing one staff member and assigning more responsibilities to individual PCU members (as reflected in the revised project document), and reduced the cost of the PCU by allocating more of the cost to other donor-funded IMO-implemented activities within the portfolio (see the table attached above). This has been done to ensure that PRO-SEAS is approved so that participating countries can receive much needed technical assistance to address marine plastic litter issues, and that the partnership between GEF, IMO and FAO is established.

It is important to emphasize that this should not be seen as standard practice by GEF (as happened with GloNoise, for example), as all other donors that IMO works with, accept IMO standards/costs of operation and management which are regulated by UN salary scale and are not negotiable.

In addition. PRO-SEAS and GloNoise **should not be compared from either a technical or management perspective** as they are completely different initiatives. The comparison leads to inaccurate conclusions about the implementation structure and the true costs required to implement PRO-SEAS. It is simply not correct to compare these 2 projects. Please see below the reasons for this.

1. PRO-SEAS is a project of much larger scale, scope, and complexity. It is an 8M global project, covering 2 sectors, shipping and fisheries.
2. The two projects are not comparable in terms of global relevance/urgency. Plastic waste is one of the most pressing issues for sustainable development, with a specific SDG indicator and a specific international treaty being developed due to the global relevance/urgency dimension of the issue. Therefore, the implementation of this initiative requires a high level of expertise and professionals.
3. The scope of PRO-SEAS deals with legal and policy reform, pilot implementation, training and enforcement/practical application related to the issue of marine plastic litter. It has several dozen activities at national, regional and global levels with multi-

stakeholder involvement. GloNoise is a small 2M project with a limited scope focusing on building stakeholder dialogue/partnerships/awareness on the issue of underwater noise.

4. The effective execution of PRO-SEAS would not be achievable with the staffing of GloNoise due to the differences described above.
5. The GloNoise CTA salary has been budgeted taking into account that the CTA will not be brought on board from the beginning but only after 7 months into the project, therefore the salary budget has been greatly reduced and does not reflect a full 2 years as alluded by GEF. In the case of PRO-SEAS, GEF will getting the full PMU in place at IMO on a fast track. This helps to improve efficiency and effectiveness in serving the countries.
6. IMO has only been able to partner with FAO and GEF on a project of the scale of PRO-SEAS because it falls under the OceanLitter programme, which allows PCU staff salaries and benefits to be split between different projects. This is because the first two years are heavily supported by the co-funding capacity of the other projects (see the table attached above). The real cost of running a project of this size is in excess of ?2m per UN salary/benefits rules applicable to London.
7. IMO is a specialised UN technical agency, we do not employ consultants to manage projects, our policy is to minimise the recruitment of consultants and to support Member States as much as possible through our in-house technical expertise. IMO prefers to retain technical knowledge to ensure our status as a hub of maritime knowledge. The PCU team covers both technical and administrative tasks of large projects such as PRO-SEAS, including communication, budget management, etc. Therefore, IMO has a project implementation team for each major project, rather than 1 project manager supervising many consultants.

(iv) The name of the CTA has been updated as CTA/PM.

c) comment (b-ii) and (iv) addressed.

FAO 28 October 24

(b)

(i) The M&E component charges have been revised and decreased.

(ii) The PIF was approved with IMO as the EA because IMO is a specialised UN agency with staff who are experts in the issues addressed by the project, and as a UN agency, IMO has UN salary scales.

The project proposes to use 2 staff members. These will be partly paid by another project over a period of 4 years. The amount required for the PMU is in line with other recently approved projects implemented by UNDP and executed by IMO. The allocation is also in line with other projects executed by Regional Seas Conventions where UN salaries are charged to the PMU; or projects executed through UNOPS where UN salaries are also charged to the PMU.

In any case, the budget has been revised to provide a better overview of staff-related costs. This includes a better distribution of costs over the years. This should make it clear that the salaries of the Technical Adviser - Legal and the Gender Advisor are covered by another project for years 1 and 2, and by PRO-SEAS for years 3 and 4. The same applies to the Admin and Knowledge Management Officer and Finance Officer. More in detail:

- The Chief Technical Advisor (CTA) will be paid, 100% by the PRO SEAS project. This must be a CTA and not a project manager as we need a person who can mainly carry out technical activities and not just manage the project.
- The Technical Adviser - Legal will not be paid by the PRO-SEAS project in years 1 and 2. The project will cover 100% of the cost in years 3 and 4.
- The Gender Adviser Legal will not be paid by the PRO-SEAS project in years 1 and 2. The project will cover 100% of the cost in years 3 and 4.

The total cost of the PMU is USD 1,382,860, which represents 19.46% of the total budget.

(iii) Sundries: IMO classify any communication materials, including developments or knowledge management as ?Sundries?. This has been made more clear in the budget matrix titles.

(iv) As explained, the project requires a CTA, not a PM. The ToR have been revised to clarify that the CTA will devote 20% of time to the management and coordination functions (charged on PMC), and the remainder 80% to technical activities (charged on technical Components).

(v) We revised the budget for travel which is now set to USD 641,024.

Kindly note that IMO programme 40% for training and 40% for travel because sometimes the venue costs are programmed under travel and not training, depending on the Agreements we have with the subcontractors. IMO has readjusted to incorporate the venue costs under training rather than travel and will try and reflect this in the Financial Statement however, please note that this may not be always possible due to the way our Agreements with our Partners/Subcontractors are set up.

(C)

All the ToR have been revised to provide clear justification to the allocation of funds in under the technical components. The duties of the Technical Adviser - Legal and the Gender Advisor are all technical and therefore covered by the components.

Annex H: NGI Relevant Annexes

8.9 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 Request N/A

Agency Response

FAO 28 October 24

OK

Additional Annexes

9. GEFSEC DECISION

9.1. GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

8th of July 2024 (thenshaw): No, please address above comments and resubmit. Thank you.

8th of November 2024 (thenshaw): No, please address above comments and resubmit. Thank you.

20th of November 2024 (thenshaw): Yes

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
First Review	7/8/2024	
Additional Review (as necessary)	11/8/2024	

**CEO
Approval**

**Response to Secretariat
comments**

**Additional Review (as
necessary)**

11/20/2024

**Additional Review (as
necessary)**

**Additional Review (as
necessary)**