

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

Review PIF and Make a recommendation

Basic project information

GEF ID

11166

Countries

Global (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

4/12/2023

Review completed by PM

4/16/2023

Program Manager

Leah Karrer

Focal Area

International Waters

Project Type

FSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

- a) Does the project meet the criteria for eligibility for GEF funding?
- b) Is the General Project Information table correctly populated?

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

2. Project Summary

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

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

3 Indicative Project Overview

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

Secretariat's Comments

(Karrer, May 9, 2023). Yes.

2. During PPG as plans are being developed, please address the following points:

Throughout the project description, there generally seems to be a greater understanding of how to reduce the loss of fishing gear (e.g. gear marking) compared with single-use items,

which do not have examples. During PPG, please consider how the noted single-use items could be shifted to reusable items through, for example, refillable water bottle systems in ports.

Interest in fostering reduce and reuse is not consistently reflected in the components, outcomes and outputs. From the text, the term "managing SBMPL" is not clear that you mean reducing use of plastic, switching to reusable products, and other measures to extend the life of products. If the intent of the project is to include pursuing reduce and reuse measures for the single-use items (in addition to fishing gear), then that intent needs to be stated by defining "managing SBMPL"; otherwise "managing litter" typically means collecting it and putting it in a landfill, incinerator or recycling.

Component 1 is vague as to what measures will be fostered. During PPG, please clarify it will include reduce, reuse and recycling measures. It is good to see Outcome 1.1 notes efforts to reduce use of plastics on ships that can potentially become garbage; however, similar clarity is missing in the other outcome and in the outputs. Similar clarifying language is needed in Outcome 1.2.

Component 2 is focused on disposal and even notes "focus on ensuring availability and efficient operations of Port Reception Facilities (PRF) that can receive and sustainably dispose of SBMPL". This focus is further reflected in Outcome 2.1 and outputs, which emphasize disposal. Yet, the ports are particularly important because this is where ship operators and fishers often buy supplies. By requiring the sell of reusable (not disposable) products (water bottles, utensils, buckets, straps, etc), the port can significantly reduce the amount of single use items discarded at sea. While adding "the potential for reduce, reuse, recycle and repurpose schemes for SBMPL" is good, it's too vague. Please specify what is meant to reuse for the ports. Also, it's unclear what is meant by the addition "including the plastics industry" in Output 2.1.2. The key plastic-related businesses to include are those selling the single-use plastic products (packaging, straps, utensils, etc) that are being discarded to work with them to switch to reusable products. It's good to see Outcome 2.2 has more added language around reduce and reuse.

The list of components (before the TOC diagram) notes Component 3 as "Developing incentives for disposal of litter" suggesting a very downstream focus; however, the actual title does not specify disposal so please edit for consistency. In Output 3.1.1 please expand examples beyond fishing gear to include measures related to single use items.

3. During PPG please discuss the possibility of pursuing a tracking system for the commonly discarded single-use plastic items onboard vessels (i.e. packaging, straps, etc).

(Karrer April 15, 2023) No.

1. The project is focused on SBML from ships and fishing vessels. My understanding is the ships are cargo ships, not cruise ships or other ships. However, there is brief mention of cruise ships in Output 3.2.1. The list of single use plastic items discarded from these

ships includes ?packaging, strapping, bags, utensils, containers for oils, chemicals and detergents?, which suggest you may be including cruise ships. Please specify early in the PIF which ships you mean, how many would be part of this project by category, and ensure the approaches and stakeholders are relevant to these ships.

2. The project is focused on addressing SBML by managing waste. For example, Output 2.1.2 is focused on port waste management plans, 2.1.3 on investment for PRF systems, and 2.2.2 on prevention and reduction of ALDFG. None of the outputs, outcomes or components discuss strategies to reduce the use of plastic products and none discuss reuse systems to minimize waste. The closest is Outcome 3.1 mentions mandatory return systems for fishing gear. Yet, ?reduce? and ?reuse? are two core principles to tackling plastic pollution. In fact they are considered the higher priority in the waste hierarchy than recycling. Further, one of the noted barriers was lack of business opportunities around reuse and return schemes. Given the list of items noted as common in SBML ?packaging, bags, containers ? these items could be reduced/eliminated or switched to reusable options to extend their life (e.g. replacing disposable containers with reusables, ensuring packaging is minimized and reusable). Please consider if ?reduce and reuse? are viable strategies and, if so, please revise the components to include measures to reduce and reuse plastic products.

3. As a global project, it would seem there would be mechanisms to foster global standards, requirements, and systems. One mechanism to consider developing is a global tracking and tracing system for ship?s plastic packaging, containers, fishing gear, and other items. These items would be checked before departure and re-checked as waste or continuing use at the next port to ensure nothing was dumped at sea. How this approach been considered? It would be similar to hook-to-plate traceability in the fishing sector.

4. Another opportunity with the global project is to create a reusable plastic product system for items (e.g. packaging, straps, containers) to be dropped off at ports for reuse by other ships instead of being sent to waste facilities. However, such a system requires understanding the needs to ships and then creating products that can be used by the range of ships. Has such a system been considered?

5. There is brief mention of mandatory return systems for the three countries. Given the global nature of shipping with ships traveling between countries, how would these work?

6. One of the measures discussed is enforcement. Please clarify what this entails ? would there be volunteer monitors and/or video monitoring similar to enforcement for IUU? And/or would there be mandatory check-ins of products upon departure and return? How would such systems work if ships are traveling among ports?

7. Please explain the logic of markers on gear. How would marking gear lead to reduced dumping at sea? Would there be a large fine if gear was found at sea and traced back to the owner? How would that be pursued?

8. There are a couple of areas briefly noted that have an opportunity for innovation ? scaling the use of ocean-safe, degradable material and creating reuse systems for single-use products such as packaging and containers. Has consideration been given to catalyzing and helping to scale new innovations through a reward program (e.g. X-Prize) or by creating an incubator that would seed fund, mentor and provide market access for innovators in this space? This may be relevant for Output 3.2.1.

9. Switching to ?biodegradable? materials is noted periodically, but not what is meant by ?biodegradable?. Given the focus is on plastic entering the ocean, it needs to be clear that the material would have to biodegrade into natural components in the ocean, which is a very high standard.

10. Regarding lack of compliance, it is odd that there is no discussion of the motivation of shipping vessel staff (and if we are also considering cruise ships, their guests) to throw items overboard. Has research been conducted on this issue? It would seem that dumping would be not just an issue of the availability of facilities at ports, but also convenience and ease. It's much easier for staff to dump at sea than to have to handle the waste the duration of a voyage. If this is the case, then effort needs to be made to incentivize staff not to dump, which would require targeted engagement with staff, such as through labor unions and other means. If cruise ships are included in this project, then their staff and passengers also need to be considered..

Agency's Comments

Response FAO:

1. To avoid any confusion please note that the project is to be titled the 'PRO-SEAS project', rather than 'GloLitter' which is a different project, although it builds on the results and knowledge gained under the current GloLitter project.

In terms of the reviewer's comment that 'single use plastic items discarded from these ships includes 'packaging, strapping, bags, utensils, containers for oils, chemicals and detergents'', which suggest you may be including cruise ships', these items are also massively used on fishing vessels and cargo ships so the PIF text is not specific to the cruise sector but to a common source of sea based sources of plastics.

Regarding the 'types' of ship that could be included in the project, these are: (i) marine transport 'cargo ships, inter-island passenger ferries; (ii) fisheries 'all types of fishing vessels including industrial and small scale/artisanal in country level pilot activities. This text has been added to the PIF to make it clear to the reader. Unfortunately, at the PIF stage it is impossible to give figures for the numbers of ships of each type that would be engaged in specific project activities. However, it should be noted that the number of vessels targeted is not an appropriate (SMART) indicator as the project will not be working with individual vessels but rather with shipping and fishing industry representatives and relevant government authorities at national, regional and global level.

Moreover, it should be recognised that IMO and FAO have global mandates with regards to the shipping and fisheries sectors (respectively). Consequently, the project is focused on the global maritime and fisheries community not individual ships, which is also reflected in the project's approach and choice of stakeholders. In terms of the remit/areas of concern of the project's key stakeholders, these are:

- BIMCO - shipping
- GGGI, ALPESCAS, OSEAN, ISSF - fisheries
- UNEP, Grid Arendal, African Marine Environment Sustainability Initiative (AFMESI), Sustainable Seas Trust (SST), World Maritime University (WMU) - shipping and fishing

Regarding involvement of the cruise sector. The project will engage with this sector but given that there are existing initiatives to address SBMPL from cruise ships and given the resource constraints and comparative advantages of IMO and FAO, the proposed project's level of interaction with the cruise sector has yet to be determined, although the project will focus mostly on awareness-raising and partnership building activities where it can make the maximum contribution. Project activities related to the cruise sector will only be fully identified and developed during the full project design (PPG) period, which will be under the framework of the Global Industrial Alliance. It should be noted that IMO covers the shipping industry that is defined as industry devoted to moving goods or passengers by water.

2. The project is not restricted to only addressing SBMPL by 'managing waste' at port locations but also on some other stages of the plastic product life cycle (to differing degrees). Indeed, the project's focus on managing SBMPL includes efforts to reduce, reuse, recycle and repurpose SBMPL where feasible (within the constraints of the project). For instance, the project aims to help reduce the amount of ALDFG entering the ocean through the implementation of gear making systems (that includes mechanisms for gear loss reporting and retrieval), and reuse will be addressed as well as recycling under project Component 3 activities. Indeed, as the GEFSEC review notes Output 2.2.2 addresses the prevention and reduction of ALDFG. Please also note that the FAO Voluntary Guidelines for Marking of Fishing Gear (VGMFG) which will be promoted through the project covers the 'use stage' as well as disposal of fishing gear. To avoid confusion, in relevant places in the PIF text the term 'managing waste' has been revised to 'managing SBMPL' to indicate that the focus of the project is not simply on disposal of SBMPL but 'SBMPL management' can include activities to reduce, reuse, recycle, or repurpose SBMPL.

In terms of strategies to address the issue of SBMPL, the project's overall approach is to address the barriers that prevent actions to reduce, recycle or repurpose plastics in the shipping and fisheries sectors. For example, the strategy of Component 1 is that by strengthening existing weak or inadequate legal, policy and institutional frameworks (Barrier 1) this will reduce SBMPL, at national, regional and global levels. This will be achieved by supporting the integration and implementation of international best practice and guidelines into these frameworks, such as through the implementation of the FAO VGMFG (being supported in all four Components). The PIF text has been strengthened to make clearer the 'strategy' (approach) for each component.

Regarding the lack of business opportunities around reuse and return schemes, these will be developed under Component 3. An analysis of project options and business opportunities to address the reduction and reuse of plastic products (within the constraints of GEF financing and co-financing and the comparative advantages of IMO and FAO and key stakeholders/partners) will be undertaken during the PPG phase, including the extent to which linkage and support can be given to existing schemes as well as new potential schemes to reduce/eliminate or switch to reusable options to extend the life of selected

items commonly found in SBMPL (e.g. packaging, bags, containers). The PIF has been revised to reflect the above and strengthen the text on proposed project activities to address measures to reduce and reuse plastic products. This includes additional text that highlights that section 2 on the Management of the IMO 2017 Guidelines for the Implementation of MARPOL Annex V , presents recommendations (and encouragement) for ship owners, governments, port operators and others to minimize the amount of plastic used on-board that can potentially become garbage, with the list of practical actions, and these Guidelines will be promoted as part of project activities.

However, it should be noted that the focus of the PRO-SEAS project is on reduction and where possible prevention of marine plastic litter, as well as environmentally safe management as this is within IMO and FAO mandates and their related regulatory/policy instruments. Moreover, requests from the countries engaged in the GloLitter initiative also stress the need for technical support to address SBMPL management and disposal from both policy and operational perspectives.

3. & 4. & 5. In terms of a global tracking system for ship's plastic packaging, containers, fishing gear, and other items, IMO already has a system to report on port reception facilities - the IMO's GISIS database. However, it does not include data on landed waste per vessel, and there are some issues and limitations on the use of this tool related to capacity building. It is intended that the PRO-SEAS project will help to identify and address such issues, which will be explored during the PPG phase as part of the development of activities under Output 2.2.1. Reporting on lost fishing gears is also considered under MARPOL Annex V and there is a Working Group in IMO Sub-Committee on Pollution Prevention and Response (PPR) that addresses this issue. Thus the PRO-SEAS project will be an opportunity to implement existing requirements on gear loss reporting in the beneficiary countries.

The GEFSEC review suggests that the project presents an opportunity to create a reusable plastic product system for items (e.g. packaging, straps, containers) to be dropped off at ports for reuse by other ships instead of being sent to waste facilities. However, such a system requires understanding the needs to ships and then creating products that can be used by the range of ships and asks "Has such a system been considered?" The PRO-SEAS project has not considered developing such a system as many plastics products (e.g. packaging and straps) are not specific for ships so addressing this would require a much larger range of actors such as the plastics-product production sector, which are involved with not just supplying to shipping and fisheries vessels but also to a much larger markets of land-based users (domestic, industrial, government, etc). This would therefore require engagement with a vastly expanded set of project stakeholders, and addressing issues which are beyond the scope and financing of the proposed project. In addition, given the generally heavy wear and tear of equipment on shipping and fisheries vessels, it is likely that much of the plastic involved would need to be either repurposed or recycled and could not be simply dropped off at a port and reused by other ships. Furthermore, shipping and (particularly) fisheries vessels vary significantly in their size, specifications

and operations, and the plastic needs of ships vary enormously. Consequently, creating products that can be used by a variety of ships is beyond the scope of the PRO-SEAS project itself. However, an analysis of existing schemes and potential for creating reusable plastic products used on boats by the shipping and fisheries industries will be undertaken during the PPG phase as part of the development of project activities under Output 3.2.1 (engagement with GIA).

In terms of mandatory return systems for the three countries mentioned in the PIF, these relate specifically to fishing gear, not shipping, as fishing vessels will generally be associated with a registered port to which they return (home base). There have been several such schemes around the world but none of them are mandatory (detail not provided in the PIF due to restrictions on the length of the text but some examples can be found in the following report: <https://doi.org/10.4060/cb8665en>). The project will examine options and opportunities for market-based instruments (MBIs) to support fishing gear environmentally sound disposal and recycling (where possible) and operational details will be defined during the PPG phase, with expected piloting at target sites in the three countries. MBIs include fishing gear 'buy-back' programmes (also commonly referred to as 'reward schemes'); deposit-refund schemes; registration and deposit systems; Extended Producer Responsibility (EPR) schemes; taxes, such as environmental taxes, to raise revenue to support recycling logistics and infrastructure; and 'indirect' (also known as 'no-cost') port waste fees.

6. The word 'enforcement' is stated under barrier 1 and Output 1.2.2. This is an error and has been removed from the PIF. 'Enforcement' is the responsibility of the participating Governments; it is not within the remit of IMO or FAO. In terms of enforcement of gear marking, this should be carried out as part of fisheries inspections protocols (by national fisheries agencies) as indicated in the Port State Measures Agreement (PSMA). However, the project activities will support implementation of the relevant international regulatory and management frameworks relating to marine plastic litter from ships, including ALDFG (under Output 1.2.2), particularly through building the capacity to implement relevant measures.

7. The Voluntary Guidelines on the Marking of Fishing Gear (VGMFG) address all the elements that are relevant to the setting up, implementation and monitoring of an effective gear marking system and related measures to address ALDFG. To effectively prevent and reduce ALDFG such a system should include:

- Affordable gear marking technologies;
- Practical means of locating and identifying the ownership of fishing gear;
- Requirements on gear loss reporting associated with effective recovery mechanisms;
- Appropriate and accessible port reception facilities for disposal of ALDFG or unwanted fishing gear;
- Monitoring, control and surveillance requirements associated with fines or other types of penalties (for example, withdrawal of fishing license).

The PRO SEAS project will support the implementation of such a system in selected countries starting with a risk assessment to assist the relevant authorities in determining the need for, and requirements of, a system for the marking of fishing gear through a consultative process with fishers' representatives and other relevant stakeholders (a framework for the implementation of such risk assessments can be found at <https://doi.org/10.4060/cc4084en>). PRO SEAS will also provide legal support for the development (or amendment) of fisheries regulatory measures to support the implementation of gear marking systems including the definition of relevant incentives/disincentives to promote compliance (see MBMs mentioned above). Provision of dedicated port reception facilities is also an incentive for fishers to bring back to port unwanted fishing gear. Development of port waste management plans with dedicated fishing gear port reception facilities will be also addressed through the PRO SEAS project.

Another important consideration is that voluntary dumping of fishing gear at sea is not the only cause of ALDFG. Other causes that lead to gear loss or abandonment include extreme weather conditions, heavy vessel traffic, and fishing gear entanglement with non-target species or natural structures, which are generally beyond the fisher's control. These causes, if known, can be addressed with other fishing gear management measures like temporal and area-based measures, capacity building/awareness raising on good practices on fishing gear management related to weather conditions, etc. ALDFG causes can be identified through fisher surveys and gear loss reporting systems supporting both the development of reporting and recovery mechanisms of gear loss and ALDFG.

8. Whilst it is not envisioned that the PRO-SEAS project will establish a global reward programme such as the X-Prize, the "incubator" method will be considered under Output 3.1.2. The text under Output 3.1.2 in the PIF has been revised to make this clearer.

9. The use of biodegradable material in fishing gear generally refers to materials that are subject to a chemical process during which microorganisms in the environment convert the materials into natural substances that are non-toxic for the marine environment. An example of the use of biodegradable materials in fishing gear is included in the GloLitter Partnerships project, where fishing gear modifications have been applied to three small scale fisheries using traps and gillnets with the objective of reducing ghost fishing efficiency after the fishing gear has been lost, abandoned or discarded at sea. Modifications include the use of plant-based materials in certain parts of the fishing gear that causes the fishing gear to collapse after a certain period of time eliminating fishing gear capacity to continue catching marine life after the operator has lost control of the gear. Biodegradable material used in fishing gear, including Fish Aggregating Devices (FADs), is generally plant-based material (like cotton, bamboo, etc.) or biodegradable resins. These include, for example, polybutylene succinate (PBS) and polybutylene adipate-co-terephthalate (PBAT) that biodegrade into CO₂ and H₂O in seawater, although the time required for biodegradation varies between different materials. This text has

been added as a footnote in the PIF to clarify the project's use of the term 'biodegradable'.

10. (To our knowledge) there has been no specific research on why individuals and crews of shipping or fishing vessels throw plastic items overboard while at sea. However, based on research into disposal of waste on land systems, e.g. general public attitudes and behaviours around littering, 'fly-tipping', avoidance and recycling of single-use plastics, it is assumed that this is a reflection of several general factors including: (i) their general view of dumping rubbish and litter (whether the individual crew members have been brought up to respect the environment, treat rubbish in an environmentally sensitive way, etc); (ii) ease of disposal of a ship's waste (whether there are convenient disposal/reuse/recycling/repurposing facilities available as it means taking waste back to port which could have a financial cost such as increased fuel consumption); (iii) incentives (positive and negative) to encourage safe disposal and anti-dumping measures (financial, legal, etc); and (iv) awareness of the impact of dumping and solutions (related to points (ii) and (iii)). These are all addressed through the four components of the PRO-SEAS project, with, for instance, Component 1 dealing with strengthening regulations related to dumping plastics at sea, Component 2 supporting capacity (technologies, tools, training and skills) to better manage SBMPL, Component 3 addressing incentives, and Component 4 seeking to increase awareness of the problem (and changing attitudes and values) and practical options to address SBMPL to key stakeholder groups. The extent of project engagement with specific stakeholder groups such as labour unions will be determined during the PPG phase when a detailed stakeholder analysis will be undertaken.

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

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

3.3 a) Are the components adequately funded?

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

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

Secretariat's Comments

(Karrer, May 9, 2023). Yes.

(Karrer April 15, 2023) Please explain the basis for Component 3 being allocated more funding than the other components.

Agency's Comments

Response FAO:

Based on information provided by the project's GloLitter partners, the identification and promotion of incentives and practical solutions to deal with marine plastic litter from shipping and fishing are judged to be a priorities, which is why the budgets for Components 1, 2 and 3 comprise the bulk of the GEF financing requested. Component 3 has the largest single budget of the four components as it involves small business development (through the incubator arrangement and other means, TBD during the PPG phase) under Outcome 3.1, and it will be implemented at local, country and regional levels. It should be noted that the co-financing contribution to this Component is also the largest of the components.

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

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

b) Are the key barriers and enablers identified?

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

4.2 JUSTIFICATION FOR PROJECT

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

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

c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?

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

Secretariat's Comments

(Karrer May 9, 2023). Yes. Related to comments regarding fostering reuse products and systems, during PPG please add companies that are providing the commonly discarded

single-use products i.e. straps, bags, utensils, water bottles, fishing gear. In order to shift them to reusable products, they need to be part of the project. Reuse and refill companies that provide systems for refill or reuse such as refilling water bottles, reusable to-go utensils and food containers also need to be included.

(Karrer April 15, 2023) Yes. The roles of the stakeholders will need to be explained in the CER.

Agency's Comments

Response FAO:

Yes, a detailed stakeholder analysis with identification of each stakeholder's role during project implementation will be undertaken during the PPG phase.

5 B. Project Description

5.1 THEORY OF CHANGE

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

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

Secretariat's Comments

(Karrer, May 9, 2023). Yes.

(Karrer April 15, 2023) No.

The ToFC includes for the high level objectives 'better control of IUU' which is outside the scope of this project. While there is mention of this as a side benefit, I think including it as an overall objective is overreaching for the project.

Text needs to be added that explains the logic of the ToFC diagram in terms of how the pieces are related. Instead the text in the diagram boxes is provided as text with elaboration, but not how the various boxes are related.

Agency's Comments

Response FAO:

'Better control of IUU' is a longer-term outcome (change) that the project would contribute to (along with inputs from other interventions), not a direct, immediate 'objective' of the project. However, it has been removed from the ToC (text and graphic) to reflect the GEFSEC reviewer's comment.

In terms of text explaining the logic of the ToC diagram, the diagram serves the purpose of illustrating the text in a concise graphic format; it does not present all relevant information. Arrows in the graphic indicate a connection (linkage, relationship) between project components, and the direction of arrows indicates the how an element leads to, or contributes to, one or more others (which may illustrate how one element may be dependent on another being achieved). So, for instance, the arrows can indicate how direct results of the project (outputs) can combine to produce wider changes (immediate project outcomes) which themselves may contribute to longer-term changes (mid-term and long-term changes in behaviour, systems and states). Arrows that point both left and right indicate a two-way flow of results from one component to another. For instance, information from components 1-3 feeds development of deliverables under Component 4. However, the causal flow of results in the ToC (from output to project outcome to wider, longer-term changes in state) also depends on a series of assumptions and drivers (indicated in the graphic) that may influence the linkage (relationship) between the elements of the ToC. This text has been added as a footnote to the ToC graphic in the revised PIF. In addition, text describing the longer-term changes to be brought about by the project has been moved from the end of the section presenting the project and its components to immediately after the ToC graphic.

5.2 INCREMENTAL/ADDITIONAL COST REASONING

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

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

5.3 IMPLEMENTATION FRAMEWORK

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

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

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

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

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments

Response FAO:

A detailed stakeholder analysis will be undertaken during the PPG with identification and clarification of the type and level of involvement of the various organisations to be engaged in the project. The project will develop a specific Stakeholder Engagement Plan, which (among other things) will set out clear roles and responsibilities for each executing partner.

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

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

Secretariat's Comments

(Karrer, May 9, 2023). Yes. During PPG more detail will be needed on methods, particularly logic for CI9, which is noted simply as based on the ALPESCAS initiative.

(Karrer April 15, 2023) No.

The indicators estimate 25% of catch benefiting. What is the basis for 25%?

Indicator CI 5 (Improved marine habitat) was calculated based on the total LME areas, which seems a gross overestimate. Only 3 countries are engaged and even within those 3 countries, the entire EEZs will not necessarily experience improved marine habitats.

Regarding CI 7 (number of shared water ecosystems under new or improved cooperative management), the project is focused on 3 countries. The only action related to regional coordination is Output 1.2.2. It seems quite ambitious to expect 3 cooperative management agreements in place due to this project.

Regarding C11, these are very high numbers. Please consider how many individuals will really benefit from the project.

Agency's Comments

Responses FAO:

For Core Indicator 8 (Globally over-exploited marine fisheries moved to more sustainable levels (metric tons)), the target of 25% was based on 'expert knowledge' (from FAO Fisheries staff) of the fisheries of Costa Rica, Kenya and Vanuatu with the potential to be targets for fisheries gear marking systems, and based on previous FAO experience of what is possible to achieve when introducing new fisheries management techniques, tools and systems within a 4-year project. However, it should be noted that which fisheries gear marking systems will be applied to which specific fisheries in the target countries will be

clarified during the PPG phase (and additional countries may be added) so this target will be refined by submission of the Project Document for GEF CEO endorsement. The PIF has been revised with the addition of this further explanation.

For Core Indicator 5 (Area of marine habitat under improved practices (excluding protected areas) (Hectares)), the target reflects the combined inshore fishing areas of the 3 countries identified for pilot projects at national level (Costa Rica - 16,607 km² (Pacific coast); 2,207 km² (Caribbean coast); Kenya ? 8,282km²; and Vanuatu ? 8,233km²; source <https://www.searoundus.org>), noting that other countries might be identified during PPG phase. This reflects the areas where most of the coastal fisheries of the three countries operate and where there is a concentration of shipping lanes around ports. However, it should be noted that project benefits will have indirect benefits over a wider area as the project would be providing SBMPL management guidance for the LME Strategic Action Programme (SAP) for each of the LMEs which if implemented would mean that plastics pollution of the marine habitat would be improved potentially over the whole LME. In addition, SBMPL entering the ocean doesn't stay where it is thrown overboard (which is why it is a global problem), so SBMPL dumped in the waters of say Costa Rica will also impact neighbouring and other national (and ABNJ) waters.

The above rationale has been added to the revised PIF. Again, this target will be reviewed and further refined if needed during the PPG phase, as additional countries (within different LMEs) may join the project. It should also be noted that the PRO-SEAS project is a global project; it is not just targeting three countries (Costa Rica, Kenya and Vanuatu), which have been partly chosen for their potential for demonstrating pilot activities related to environmentally sound management of SBMPL.

For Core Indicator 7 (Number of shared water ecosystems (fresh or marine) under new or improved cooperative management), again, the target reflects that the results of the project will be integrated into LME-wide planning and management processes, with, for example, information and guidance on managing SBMPL provided to national and regional implementation of SAPs associated with each LME (e.g. through Components 1 and 4). Also, in terms of the project activities directed at addressing ALDFG in fisheries, the project will engage RFMOs in the project which cover a wide geographic area, although the specific RFMOs to be involved will only be confirmed during the PPG phase. Again, therefore, this target will be reviewed and further refined if needed during the PPG phase, as additional countries (within different LMEs) may join the project.

For Core Indicator 11 (Number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment), the target has been revised downwards in response to the GEFSEC comments. The revised total is based on the following calculation: 4 capacity building workshops per country each year for 4 years with 40 participants as an average, which gives 640 for each country, under Components 1 and 2. The PRO-SEAS project currently has three participating countries, so the total of ?direct beneficiaries? is 1,920. Based on the estimate of males and females working in the fisheries sector in Costa Rica and Kenya, the gender breakdown would be 49% male (314) and 51% female (326) in

Costa Rica; 45% males (288) and 55% females (352) in Kenya. There is no data from Vanuatu so an estimate of 50% male (320) and 50% female (320) has been used. In addition, an estimated 120 people (30 per year, 10 per country per year) will be direct beneficiaries of the project's small business development activities under Component 3 (training, mentoring, other support but a likely smaller number going on to establish viable businesses). This group will have an expected mix of 40% male (48) and 60% female (72), based on FAO Fisheries experience of fisheries value chains and developing small business ventures with fisher communities and likely opportunities for SBMPL recycling and repurposing enterprises. Consequently, the total number of people expected to benefit is: 2,040 comprising 970 males and 1070 females. Again, this target will be reviewed and further refined if needed during the PPG phase, as additional countries (within different LMEs) may join the project, and particularly as details of Component 3 SBMPL small business development are developed.

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

Secretariat's Comments

Agency's Comments

5.6 RISKS

- a) Are climate risks and other main risks relevant to the project described and addressed within the project concept design?**
- b) Are the key risks that might affect the project preparation and implementation phases identified and adequately rated?**
- c) Are environmental and social risks, impacts and management measures adequately screened and rated at this stage and consistent with requirements set out in SD/PL/03?**

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

5.7 Qualitative assessment

- a) Does the project intend to be well integrated, durable, and transformative?**
- b) Is there potential for innovation and scaling-up?**
- c) Will the project contribute to an improved alignment of national policies (policy coherence)?**

Secretariat's Comments
(Karrer April 15, 2023) Yes.

Agency's Comments - - -

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

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

Secretariat's Comments
(Karrer April 15, 2023) Yes.

Agency's Comments - - -

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

Secretariat's Comments
(Karrer April 15, 2023) Yes.

Agency's Comments - - -

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

Secretariat's Comments
(Karrer, May 9, 2023). Yes; however, the Portal version of the PIF Section C does not include the table. The table is however a separate document in the Portal with the needed information.

(Karrer April 15, 2023) No. Please incorporate this aspect.

Agency's Comments

Response FAO:

A table summarizing the type of contribution to the 23 Kunming-Montreal Global BD Framework has been added in section ?C. Alignment with GEF-8 programmatic strategy?? of the PIF template in the portal. The table has also been uploaded as a standalone document in the roadmap of the submission for easy reference purposes.

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

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

Secretariat's Comments

(Karrer May 9, 2023). Yes. Please note to discuss with Ghost Gear Initiative, which tackled marine-based litter from fisheries and has a project in Vanuatu.

(Karrer April 15, 2023) No. While useful information was provided regarding the importance of different stakeholder groups and global organizations, information on consultations was not provided. It's unclear how far these discussions have progressed at the global and national levels. Please add this information.

Agency's Comments

Response FAO:

A full list of the key stakeholders with which the IMO and FAO design team have engaged during the PIF development is given in Section D of the PIF, along with the dates when key discussions were held.

In terms of a summary of the consultations held, initial exploratory (and in some cases follow-up) meetings were held with the key stakeholders and partners during the period August 2022 to April 2023. The proposed project was explained to the stakeholders during these meetings and feedback considered and where relevant incorporated into the development of the PIF. All those stakeholders listed have expressed an interest in participating in both the development (PPG phase) and implementation of the project if the PIF is approved. A reflection of this is the various amounts of co-financing offered by these stakeholders (see co-financing table in Annex A). Discussions at national level (with the three participating countries) have been very positive (reflected in their Letters of Endorsement and provisional co-financing offered) as the countries see the project as an opportunity to support their own priorities on the management of SBMPL. Similarly, the global level stakeholders/partners recognised the benefits of engaging with the IMO and FAO led initiative to further their own agenda and to work with IMO and FAO as recognised global leaders in their respective areas (IMO shipping, FAO fisheries). A more detailed stakeholder analysis will be undertaken during the PPG phase and specific activities with which stakeholders and partners will be engaged will be defined. The project will also develop and implement a specific Stakeholder Engagement Plan. Text has been added to the revised PIF to address the GEFSEC comment.

If needed, email and other correspondence (e.g. notes of Team meetings) related to the consultations can be provided to the GEFSEC.

Annex A: Financing Tables

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

STAR allocation?

Secretariat's Comments

Agency's Comments

Focal Area allocation?

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

LDCF under the principle of equitable access?

Secretariat's Comments

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

(Karrer April 15, 2023) Yes.

Agency's Comments - - -

Annex B: Endorsements

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

Secretariat's Comments (Karrer May 9, 2023). Yes.

Agency's Comments

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

Secretariat's Comments (Karrer May 9, 2023). Yes.

Agency's Comments

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

Secretariat's Comments (Karrer May 9, 2023). Yes.

Agency's Comments

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

Secretariat's Comments

Agency's Comments

Annex C: Project Location

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

Secretariat's Comments

(Karrer, May 9, 2023) Yes

(Karrer April 15, 2023) Please explain the basis for choosing the 3 countries.

Agency's Comments

Response FAO:

It should be noted that the PRO-SEAS is a global project and the three countries were chosen as representatives of countries that are seeking to address SBMPL, and, as of autumn 2022, they were among the most advanced in terms of SBMPL country assessments and NAP development (although other countries are also advancing and may be included during the PPG phase). The three countries also represent a geographic spread representing several LMEs.

In addition, the inclusion of these three countries was discussed with the GEFSEC on 23 February 2023 and as a consequence the countries reconfirmed their endorsement and participation in the project as countries for pilots activities.

Annex D: Safeguards Screen and Rating

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

Secretariat's Comments (Karrer May 9, 2023). Yes.

Agency's Comments

Annex E: Rio Markers

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

Secretariat's Comments

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments (Karrer May 9, 2023). Yes.

Agency's Comments

Annex G: NGI Relevant Annexes

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

Secretariat's Comments

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments
(Karrer May 9, 2023). Yes.

(Karrer April 15, 2023) No

Agency's Comments - - -

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

Secretariat's Comments

Agency's Comments
Review Dates

	PIF Review	Agency Response
First Review	4/16/2023	
Additional Review (as necessary)	5/9/2023	
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		