



# Strengthening integrated transboundary source-to-sea management of the Ruvuma River Basin and its coastal zones to ensure ecosystem health and livelihood security

Review PIF and Make a recommendation

## Basic project information

**GEF ID**

11410

**Countries**

Regional (Malawi, Mozambique, Tanzania)

**Project Name**

Strengthening integrated transboundary source-to-sea management of the Ruvuma River Basin and its coastal zones to ensure ecosystem health and livelihood security

**Agencies**

IUCN

**Date received by PM**

10/18/2023

**Review completed by PM**

11/22/2023

**Program Manager**

Astrid Hillers

**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

(10/25/2023)

1. The project is aiming at strengthening cooperation on the shared Ruvuma basin and could be overall eligible, but the reasoning for prioritizing GEF support and engagement in this basin needs better articulation with respect to how this will be leading to substantial GEBs. This needs better articulation and information in order to be recommended for consideration for GEF IW finance.

Also, as described, some of key environmental threats appear to include mining activities (not clear if this is all artisanal and/or larger mining companies), coastal LG industries, plus planned infrastructure, industrial and commercial agricultural development. While this lacks a quantitative description (for the most part), it is therefore not clear why the 'on the ground' demonstration projects appear to mainly focus on community based alternative rural livelihoods and are seemingly spread across various themes which seems uncoordinated and with little lasting impact which is one of the criticisms and also listed as barrier for sustainable integrated basin management. While the TA components are overall aligned with the IW strategy, investments (component 4) needs to be more focused for greater impact on the main larger threats to the basin. As written it is not clear why the project is of high priority based on GEBs for limited GEF finance on transboundary waters in Africa.

2. Please spell out acronyms in all tables and when used for the first time in the text (e.g. GWP-SA, RBC, ARA Norte Moz).

3. Taxonomy: What are the innovative financial mechanisms ?

(11/20/2023)

1. The information has been substantially revised to support the project rational.
2. Please spell out GWP-SA as executing partner.

(12/1/2023)

Comment addressed. Cleared.

#### Agency's Comments

**IUCN, 30 November 2023**

1. Noted
2. Done - GWPSA spelled out at Global Water Partnership Southern Africa in the General Project Information Table.

**IUCN, 16 November 2023**

1. This is noted ? information has now been added to the Project Summary in order to explain why the Ruvuma River Basin is a high priority bases on GEBs in the basin. The explanations have been made more explicit and not generalised - references have also been provided. Also, more detail has been provided in the Project Description on the same to provide information that shows the importance of the ecosystems in the basin. The environmental threats have been made clearer ? and also the immediate pressures have been elaborated. Component 4 ? has been made more focused around private sector engagement and development of sustainable financing models.
2. Acronyms have been spelt out
3. The innovative financial mechanisms ? have now been made clearer in Component 4 focus will be on developing sustainable models in the sites to be selected working with private sector.

#### **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

(10/25/2023)

No, see also comment above. A large part of the basin is described as environmentally and ecologically untouched, yet the environmental capital/global priority is not substantiated besides e.g. general statements that biodiversity is of "high degree" and some listed protected areas present in the basin. Threats appear to be via substantial planned and industrial developments but no description on the what, where, scale and "by who" and no anticipated costs and benefits are described. It is not clear why with the low level of current population the investments in alternative livelihoods through e.g. catchment management and coastal rehabilitation are addressing main threats nor how these activities translate into income by themselves.

Further, please explain what the key source-to-sea reaching threats are and how they are addressed. These usually are related to pollution, sediment loads or flow alterations.

Please frame the investments in line with the described threats, e.g. including national policy reforms and/or visible on the ground investments including engagement with larger private sector actors which appear to provide the largest immediate and medium term threat to sustainable basin management.

Please revisit not only the summary but the Theory of Change, PDO and mainly the investments/component 4 for greater focus and measurable impact. The GIZ investments in the revised monograph and IWRM plan could be valuable to inform the design on this project once available

(11/20/2023)

The project concept and rationale has been much improved and the joint work plan with GIZ is good to see. Please provide a concise project summary of no more than one page (suggested is 1/2 page but that is not a hard limit). Please make sure to mention key problems, suggested interventions and key stakeholders to address these barriers and root causes.

(12/1/2023) Comment addressed.

## Agency's Comments

**IUCN, 30 November 2023**

Project summary reviewed to make it more concise.

**IUCN, 16 November 2023**

Gender statements in the Project Summary have now been substantiated with references ? and current threats have also clearly been explained differentiating these from planned activities. More specificity has been made to the current problems and the planned activities as well ? including the costs and benefits have also been provided where information has been available.

The Component 4 has been refocused ? to show how these catchment activities will contribute to the management of the source-to-sea system. Focus will also be building sustainable financing models through private sector engagement ? to ensure that these activities translate into income.

The source-to-sea reaching threats have now been defined in a number of sections ? including the section that describes the ToC.

Component 4 on investments has been reframed to focus on private sector engagement in dealing with the identified threats.

The PDO has been updated to ensure that it is measurable and describes what exactly this project will aim to achieve.

The link to the GIZ has been explained in the PIF ? a joint workplan was developed by SADC and the JWC which links the two processes. The GIZ support to update the Monograph and IWRM Strategy focuses on issues of ensuring assurance of water supply in the basin. The proposed project will have a huge focus on ensuring ecosystem health through implementing a source-to-sea management approach that promotes upstream and downstream linkages ? and addressing the gaps in understanding the source-to-sea system.

### **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

(10/25/2023)

1. Water sharing agreements, i.e. allocations, are hard to achieve. When this will be drafted, consideration may include key principles of international water law to address future developments (incl. prior notification; and provisions to deal with dispute resolution; and also mechanisms in the draft to make "water allocation" consider precipitation and flow changes due to climate change).
2. Please mainstream gender consideration in all outputs and activities instead of having separate outputs in either of the components.
3. Please explain or confirm meaning of 'groundwater resources hotspotpotential' ? Does this mean identifying most likely areas of groundwater contamination from natural or anthropogenic sources ? Also, the wording of "groundwater aquifers" appears odd/ a typo.
4. Disaster management plan and response system and flood early warning system? There is little background data in the project description to outline the flood extend, location of main affected areas and frequency and what the early warning and response time gains will be from a transboundary early warning system ? In fact, the 2011 monograph apparently stated that there are little flood risks. Otherwise, this may be better fit for adaptation finance.
5. Gender and social analysis and gender action plan: this needs to be finalized during project preparation, not only during implementation.
6. Component 4: Please see comments in question 1 and 2. Please focus on main transboundary threat/s.

In addition, please see below a few comments on the current activities. Please realize though that these likely will be mood and these will in majority want to change for a resubmission under IW.

7. Please explain why this project is addressing artisanal mining and what type of mining (mining for what)? Has artisanal mining been identified as transboundary threat? Sedimentation dams would trap sediments but do not eliminate hazardous chemicals. At least Malawi has ratified the Minamata Convention and could approach the Chemicals and Waste focal area for funding elimination of mercury from gold mining.
8. Conservation agriculture - what transboundary threat is addressed ? What will be the impacts ? see comments on Core Indicators.
9. WASH - not an eligible theme under IW. This is purely national to be addressed and also not sustainable as a regional investment.

10. Component 3: There is too much vagueness and jargon in the use of wording around the WEF Nexus and blue economy. Please be clearer what is meant and addressed by the project. e.g. blue economy : what aspects are you looking at and which ones not.

(11/20/2023)

Please spell out JWC in the overview table

1. - 3. Addressed.

4. Agreed as a way forward.

5. Noted.

6. Good to see these revisions and attention to imminent threats and cooperation with the private sector.

7. Thanks for the explanation.

i. The lack of regulations and/or their enforcement appears a problem based on the situation described and e.g. pollution from mining operations. Transboundary EIA guidelines etc. will not be meaningful and get traction implemented if national and local regulations are not in place and/or enforced. Please consider project interventions to strengthen the regulatory frameworks and enforcement capacities on national level.

ii. Learning from OKACOM and applying the sustainable development space concept appears an interesting approach to follow.

8. and 9. addressed and good to see the source- to- sea dimension addressed in a tangible manner.

(12/1/2023)

Remaining comment addressed. Cleared.

### Agency's Comments

**IUCN, 30 November 2023**

Done - JWC spelled out as Joint Water Commission in the overview table.

7.1. Project interventions to assess and strengthen the regulatory frameworks and enforcement capacities at the national level.

Output 2.1.5 has been included and focuses assessing regulations and enforcement in the different parts of the basin and develop a capacity building plan to respond

Output 3.1.2 on the development of National Action Plans linking to country and regional priorities has been expanded to take into consideration the enhancement of regulation and enforcement that support transboundary governance.

Output 4.1.3 which focuses on promoting community involvement across the basin on the implementation of sustainable land and water practices has included activities to strengthen capacities to support the enforcement of regulations.

### **IUCN, 16 November 2023**

1. Noted and agreed ? the focus in Component 1 has been updated to focus on the development of a Transboundary Agreement based on international water law principles and the SADC Revised Protocol on Shared Watercourses
2. Gender considerations have now been integrated into all outputs and activities.
3. The term has been changed to ?groundwater hotspots? and has now been explained as areas where groundwater contamination is occurring. Typo has been corrected.
4. The focus on Disaster Management Plans has been removed ? to focus more building a water information system that will support exchange of information. Parts of the basin have been hit by recent tropical cyclones ? and this will be something that the TDA will look into.
5. Agreed ? Gender and Social analysis will be done during the PPG ? as the basis for developing a Gender Action Plan for the project implementation. This has been updated to reflect this.
6. Component 4 ? has been revised to be more focused as explained above.
7. The mining activities in the basin have now been explained ? and at the local level its an issue of law enforcement due to illegal operations. Focus is on the project ensuring that at the basin level a framework guiding on the understanding of a sustainable development space that is developed by the stakeholders Output 2.1.5 ? this process will learn from the work done by OKACOM also a pristine basin in the region. It will form the basis on future work in developing Transboundary EIA guidelines and SEAs.
8. Activities in Component 4 have now been focused to support ecosystem health and social inclusion through water source protection and sustainable water and land management practices working in partnership with the private sector.



9. Noted ? WASH activities have been removed. Focus will be on protecting water sources Output 4.1.1

Terminologies have now been focused ? the project will aim to contribute to water, food, energy, and environmental security. The main integrated approach to be implemented is the source-to-sea management. With regards to the blue economy an output (4.2.2) focused on investments working with the Marine Park has been introduced to manage land-based activities that have an impact on the coastal and marine ecosystems critical for the

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

#### Secretariat's Comments

(10/25/2023)

1. Please mainstream gender within the component design and not as separate outputs. At this stage it is not clear what funds or targets for participation in the project components are aimed at.

2. Please include participation in and contribution to [IW:LEARN](#) in component 5 (please budget at min. of 1 % of the GEF grant).

(11/20/2023)

1. and 2. Addressed.

Please make sure that *at endorsement stage* gender dimensions and targets are mainstreamed in the design and reflected in the project results framework.

Cleared.

#### Agency's Comments

**IUCN, 30 November 2023**

Noted on gender dimension? this will be prioritised at endorsement stage.

**IUCN, 16 November 2023**

1. Gender considerations have been mainstreamed accordingly.

2. Done ? included in budget

**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

(10/25/2023)

1. The distribution of finance cannot be commented on right now until the reasoning for prioritizing engagement in this basin with respect to leading to substantial GEBs is better articulated. See earlier comments.

2. Please make sure that the co-finance to grant ratio is maintained for the PMC. Right now the co-finance for project management is zero. That needs to change and proportionality be shown at the same level and the overall grant to co-finance.

(11/20/2023)

Comments addressed.

#### Agency's Comments

**IUCN, 16 November 2023**

1. Noted ? reasoning for prioritizing Ruvuma leading to GEBs has been elaborated

2. Noted. Co-finance to grant ratio maintained for PMC ? this has been updated.

#### **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**

(10/25/2023) No. Please see earlier comments.

1. There is a lot of general information with little quantitative data and information. The background could be much clearer if it was written not as a relative general background but much more clearly identifies the drivers and root causes of threats to the basin, be more concise, and built less on subjective observations in recent mission (incl. 'likely future occurrences' and 'discussion with stakeholders' and 'possibility of increasing water demand') but on verifiable information.

The development level in the basin is low and water demand is at less than 1 % of available water resources at present.

2. For future planned gas extraction and liquifaction in Mozambique not reference is made to an EIA that would have taken place as part of the planning.

3. For large scale agriculture which is or will be expected to invest in the basin, there is expected to be information on the company and engagement to address impacts. Same of the type and scale of mining (large and small) and type of pollution expected based on the mining techniques.

4. Small scale, local food wood exploitation; community cattle grazing and similar activities while possibly contributing to local impacts are unclear to add up to significant transboundary concerns.

5. As per the monograph of 2011 flooding was not a major problem in the basin mainly due to low number or absence of major of settlements.

The above examples describing the situation in the basin are taken from the text do not align with the stated barriers or build a strong case for the investments suggested in the Ruvuma basin.

(11/20/2023)

1. The description has been much improved and explained why the ecosystems needs protection and action at this point to avoid degradation.

i.) The numbers for "water for nature"/e-flows cited span a very large range widely and seem inconsistent. Please clarify, e.g. desktop model numbers between 23 - 67 % of the

mean annual run-off (a huge range) while ecosystems requirements from minimum releases are cited as between 6 and 22 % depending on the sub-basin.

At the same time current withdrawals around 1 % remain very low and not conflicting with ecosystems needs.

ii.) Why is governance of resources on local and national levels not one of the main barriers to be addressed by the project? Same for enforcement of regulations. If this would be in place then e.g. pollution such as from at least commercial mining or agriculture would be much less of a concern. Also, are water withdrawal permits mandatory or exist for surface and/or groundwater withdrawals?

2. and 3. addressed and the engagement with these private sector entities, incl. e.g. Olam, is now part of the project.

4. and 5. addressed.

Note to the IUCN team: Please in future PIFs aim to keep somewhat/roughly to the text lengths and word counts suggested in the PIF template.

(12/1/2023)

Comment addressed. Cleared.

### Agency's Comments

**IUCN, 30 November 2023**

1. Noted.

i. Text with numbers updated to provide more clarity.

ii. Barrier 6 has been included to highlight the lack of regulations and enforcement capacity in the governance of resources at the national and local levels. Water allocation systems/regulations are currently weak, and an assessment will be done during the TDA.

Guidance on the word count limits noted ? this will be improved on in future PIFs.

**IUCN, 16 November 2023**

1. Quantitative data has been added and referenced with literature from recent studies. The background now clearly elaborates on the water demand issue - noting that environment is the biggest user of the resource ? and the need to have a balanced approach in managing this.
2. Done ? EIAs have been referenced.
3. Done ? examples have been provided.
4. The importance of ecosystem health and social inclusion vulnerable areas within the source-to-sea system have now been clarified to justify the investment at the local level.
5. The extreme events being observed as per AR6 and reports on recent cyclones ? will be further investigated in the updated Monograph and subsequently considered in the TDA/SAP looking at the impact to the source-to-sea segments.

The barrier analysis and ToC have now been updated to align more with the situational analysis.

#### **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

(10/25/2023)

1. The overall justification of the project is weak and needs revisiting - please see previous comments.
2. Once and if there is clarity on the urgency and justification for GEF investment in the basin, we can comment in more detail on the design of the project and possible alternate designs, durability in view of climate change as well as likely sustainability and an exit strategy of the project to maintain activities post project closure.

(11/20/2023)

1. The overall justification and background has been substantially revised and supports the project and the indicated interventions much clearer - despite the text being very " long winded" and somewhat repetitive. As commented on before not addressing governance

and enforcement capacity gaps appears as an omission. Transboundary governance needs to build on adequate national governance frameworks.

2. There should be headings under "Project Rationale" both for the "Situation Analysis" and for a "Justification". Please more clearly describe the role of both key governmental and non-governmental stakeholders with relation to the project components in the justification and the TOC. The engagement with e.g. TFCAs (and their secretariats?), specific private sector entities, and marine and coastal entities (incl. the Nairobi convention) is well noted, but their role within the components should be made more clear.

3. Please provide lessons learned from related previous investments both on national and basin-/regional level that this project will build on.

(12/1/2023)

Comments sufficiently addressed at PIF stage. Cleared.

*During PPG and implementation:* Please use the SADC hosted biannual RBO exchange meetings, participation in [IW:LEARN](#) and other exchanges for experience sharing and learning from other RBOs.

#### Agency's Comments

**IUCN, 30 November 2023**

1. Governance and enforcement capacity gaps at the national level has been included in the project justification and the linkage between the national and transboundary governance and regulatory frameworks has been emphasised.

2. Headings for the Situational Analysis and Justification sections included. The role of key governmental and non-governmental stakeholders in relation to the project components has been emphasised in the project description.

3. Included section on how the project will build on lessons learned from the implementation of projects across various levels in the region.

**IUCN, 16 November 2023**

1. The justification has been revisited and updated to showing the urgency of the intervention also how the project will contribute to GEBs.

#### **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

(10/25/2023)

1. The theory of change needs a clearer outline of the problem statement and vision of what the project aims to achieve.
2. The PDO should then be formulated accordingly and be part of the theory of change and supported by the analysis of pathways to get there and not by boxes of predetermined project components.
2. As mentioned under Part 1/project outline, the components aiming at strengthening cooperation would in general apply to IW projects but not in the absence of immediate pressures. The GIZ State of Basin report and IWRM plan may aid in defining needs for policy reforms and investments on various scales once completed. Currently the suggested investments are dispersed and not adding up to any significant impact and not aligned with addressing larger transboundary threats. (Note: the aim to explore some innovative approaches to e.g. groundwater connectivity via isotope hydrology or eDNA to track impacts of mining is noted and appreciated.)
3. Please also consider the challenge of implementing and sustainability of the set of suggested diverse interventions. By our experience these end up often bypassing country based institutional systems and are not durable past project closure.
4. Please take account of the comment provided in question 3, indicative project overview, including the need for mainstreaming gender considerations.

Additional comments will be provided once the overarching comments have been addressed to justify a Full Size Project at this point.

(11/20/2023) and (11/30/2023)

1. The PDO and Theory of change narrative has been enhanced overall but needs a more concise storyline. Further, the need for national policy and regulatory reform and enhancing enforcement of regulations is not addressed which needs revision and/or clear

explanation if related efforts are addressing this which are being closely coordinated with the suggested project.

2. (revised numbering )Please elaborate on how cross sector cooperation is going to be addressed systemically in basin governance. The description of involvement and role of stakeholders seems an add on and is not well integrated in the description on how the project aims to address key barriers.

3. TOC diagram: The boxes on outputs and outcomes seems to not correspond well with the revised project overview table. Please update as needed,

4. The involvement of national institutions in the pilots is well noted. Addressed.

5. See earlier comment on stakeholder roles.

6. In addition, the Agency is requested to also integrate gender perspectives in the outputs under Outcomes 3.1 and 5.1

(12/1/2023) Comments have been addressed. Cleared.

## Agency's Comments

### **IUCN 30 November 2023**

1. TOC updated to make the introduction to the TOC more concise to clearly show linkages between the barriers and envisaged outcomes. We have also clarified the role of the stakeholders.

2. Cross sector cooperation will be driven through national and transboundary platforms (learning from ZAMCOM processes). This will be further contextualised during the PPG phase to ensure the JWC's role is defined to drive cross-sectoral cooperation. National Ministerial Inter-Sectoral Committees are to be established and will be instrumental in providing the political leadership.

3. TOC boxes on outputs and outcomes updated to correspond with project overview table.

4. Noted

5. Addressed



Gender perspective have been elaborated in Outcomes 3.1 (through ensuring inclusive participation of women and youth) and 5.1 (through ensuring participation of women and youth in knowledge activities and targeting information sharing with them).

**IUCN, 16 November 2023**

1. ToC section has been rewritten ? to show the different pathways to address the barriers and achieve the intended aim of the PDO.

2. PDO has been included as part of the ToC ? and lined to the analysis of pathways

The immediate pressures have now been highlighted much clearer. The link to the updating of the Monograph has been explained as it is part of a Joint Workplan developed with SADC, the JWC and partners. Component 4 has been designed to focus on key hotspots in the source-to-sea system where communities can contribute to ecosystem health and social inclusion is promoted.

3. Noted ? the intention has been to work within the country?s

4. institutional systems in order to ensure alignment and sustainability. This has now been elaborated on working with identified responsible parties to implement.

5. Gender mainstreamed at activity level

**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

(10/25/2023)

Based on comments already provided there is no base to comment on this at present in a constructive manner.

(11/20/2023)

Yes, adequate for PIF stage.

Cleared

## 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

(10/25/2023)

1. The suggested execution modality via GWP-SA has been proven beneficial in other GEF projects. It would be good to see a capacity assessment for GWP -SA to take on another regional IW project.
2. Is there a suggested location of the PMU ? What are country contributions to the JWC at present ? Is there a host country agreement for JWC?
3. On KM - please see earlier comment to include participation in IW:LEARN. Please also try to indicate an approximate timeline of KM products and please also refer to the new GEF KM policy.
4. The modalities to implement on the ground modalities are unclear, including how country systems will be strengthened.

(11/20/2023)

Previous comments addressed. The location of the PMU in the basin and identification of the location in consultation with the countries during PPG is well noted. Same for execution of on the ground intervention through national institutions and structures.

1. Please fill in yes/no for the question if IUCN expects to play an execution role in the project.
2. Please provide lessons learned from previous interventions (comment already provided earlier; no need to respond twice).

At *endorsement* please also address the need for a KM strategy, identify the potential main target groups for KM and outreach and provide outputs including an indicative timeline.

(12/1/2023) Comments addressed. Cleared.

## Agency's Comments

### **IUCN, 30 November 2023**

1. Noted - responded in the PIF.
2. Done.

Done ? KM strategy will be developed during the PPG Phase and implemented under activities related to output 5.1.4 during the project.

### **IUCN, 16 November 2023**

1. Noted ? on GWPSA it is proposed that an assessment be carried out during PPG. Also noting that the GEF BUPUSA will come to an end in Dec 2024.
2. Location of PMU will be in the basin either in Mtawara or Cabo Delegado a decision will be made during the PPG phase ? basin offices can be setup in the different countries to support the implementation of Component 4. Country contributions have not started yet ? however, the governments have allocated focal points to support the JWC work.
3. Noted on KM
4. Modalities have been explained in Component 4 ? focus is on working with national institutions to implement projects through partnerships.

**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

(10/25/2023)

As mentioned before not only Core Indicators but overall projects GEBs and relative priority for GEF prioritization in GEF 8 should be much clearer.

Please provide not only values for CI 7, but all project relevant co-benefits and indicators, including the number of direct project beneficiaries and scale of interventions/investments.

(11/20/2023)

Core indicators beyond IW related have been addressed.

The targets for improved management of protected areas (indicator 1) at 4 million hectares seems very high. Preferably a more conservative approach and a target that is capturing where the project interventions will have a direct impact on protected areas may be more realistic.

(12/1/2023) Comment addressed.

## Agency's Comments

**IUCN, 30 November 2023**

Indicator 1 targets have been revised to be more conservative, however, these will be verified during the PPG phase once potential sites are identified.

**IUCN, 16 November 2023**

Core indicators have now been explained to be clear and link to the source-to-sea approach. Also values have been provided for other CIs including number of direct project beneficiaries.

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

Secretariat's Comments N/A

## Agency's Comments

**5.6 RISKS**

**a) 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

(10/25/2023)

Please provide more detail and specificity in the risk assessment sections. e.g. provide data for the climate assessment, describe any local and regional political and governance challenges across sectors, social groups or otherwise, macro-economic impacts on basin development and reduced threats (?), risk from incoherent policies across sectors (e.g. are there inherent subsidies that would favor environmentally harmful investments or on the other hand positive ones? that could be scaled up?); describe in the technical design what the current key source to sea impacts are that the project aims to counteract; and finally what about risk of institutional sustainability on regional level.

(11/20/2023)

1. Environmental and Social Risk: Please note that this should not only be the risk TO the project, but also potential impacts BY the project interventions. The ESS rating e.g. is rated by IUCN as moderate.

2. Political and governance. Please explain clearer what the cited conflict's impacts are on the project area and the project. Clearly relying on military engagement is not a strategy for the project. How far does the project expect to operate in active conflict affected areas and what mitigation measures are considered to aid in local conflict resolution.

3. Strategies and policies. The legal review during the TDA should also take a closer look at potential policies and incentive structures to industry and agriculture that directly or indirectly contribute to land conversion and environmental degradation.

(12/1/2023) Comments have been addressed.

#### Agency's Comments

**IUCN 30 November**

1. Environmental risks have been updated to address those potentially caused by the project.

2. Political risks have been highlighted and mitigation measures have been proposed. The insurgency took place in 2019/2020 and is in the coastal areas on the outskirts of the basin. However, measures will be put in place to manage the risk.

Noted. This has been highlighted explicitly in the document.

### **IUCN, 16 November 2023**

Risk assessment section has been updated to provide more details ? on climate assessments, governance challenges, policies and subsidies. In the technical design the source-to-sea impacts have been included ? and how the issue on institutional sustainability will be addressed.

#### **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?**

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

#### **Secretariat's Comments**

(10/25/2023)

1. At present there are doubts to sustainability and scaling potential. - see also earlier comments.

2. There is not yet an analysis of the coherence of national policies across sectors leading to or counteracting integrated basin management.

(11/20/2023)

The project is aiming at several innovative approaches that are worth noting such as:

- Adopting the 'sustainable development space' concept used by OKACOM
- Employing novel approaches in the basin assessment including a partnership with Nature Metrics to build on their work with EDNA in the basin
- Including efforts on citizen science in the basin and e.g. building on experiences with working with schools in river monitoring used in Southern Africa

- Learning from the ORASECOM and LIMCOM and considering Joint Basin Surveys which combine science and public outreach.

The project is also making efforts to capitalize on private sector water stewardship initiatives, e.g. by OLAM and others, and exploring sustainable finance mechanisms.

Please note that financing for core costs of the JWC nevertheless will need to build on country contributions and needs to be built into the process of negotiating an agreement and permanent transboundary legal and institutional framework between the countries *during project implementation.*

(12/1/2023) Yes. Cleared.

### Agency's Comments

#### **IUCN, 30 November**

Noted. The JWC contribution discussions during agreement negotiation have been explicitly highlighted under Outcome 1.1

#### **IUCN, 16 November 2023**

1. The issues have been addressed showing clearly how the project will support national institutions and build partnerships ? and sustainable financing models
2. No national policies contradicting with integrated basin management have been identified ? a legal equivalence study was conducted in 2017 covering the three countries (under ZAMCOM)

### **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

(10/25/2023)

1. The project as described does not appear to yield large enough impacts and GEBs in terms of the IW focal area to justify the level of investment of the FSP.

(11/20/2023)

The largely revised PIF and interventions now provide a basis for the proposed GEF IW support to the project and are aligned with the IW objectives including the 'source-to-sea' split of IW objectives.

Clkeared

#### Agency's Comments

##### **IUCN, 16 November 2023**

1. This has now been clarified ? the Ruvuma Basin harbors some of the most critical ecosystems and this has been evidenced in the Project Rationale.

**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

(10/25/2023)

1. The project may overall be consistent with national strategies but it not clear how much of a regional (and national) priority it is. Given other priorities of the countries and the SADC region it is not clear how much of a priority this project is for the involved countries compared to other GEF support requests likely to come forward in GEF 8.

(11/20/2023)

See previous responses. Comment addressed.

#### Agency's Comments

##### **IUCN, 16 November 2023**

1. The project justification has now been elaborated and made more explicit showing the importance of the Ruvuma River Basin - the Project Rationale provides more detail.

**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  
(10/25/2023)

BD or GBF benefits in form of indicators and targets are not provided.

(11/20/2023)

Please identify which of the 23 targets of the Kunming Montreal GBF the project contributes to and how this is will be reflected in the project targets.

(12/1/2023) Done. Addressed and cleared.

Agency's Comments  
**IUCN, 30 November 2023**

GBF targets have been highlighted clearly and linked to the project core indicators.

**IUCN, 16 November 2023**

The GBF indicators and targets the project will contribute to have been added.

#### **7 D. Policy Requirements**

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

Secretariat's Comments  
(10/25/2023)

Mostly.

1. Please describe the role of the private sector (beyond individuals such as subsistence farmers and artisanal miners).

(11/20/2023)

Comment addressed.

Agency's Comments

**IUCN, 16 November 2023**

1. Private sector involvement has been elaborated

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

Secretariat's Comments (10/25/2023) Yes.

Agency's Comments

**8 Annexes**

**Annex A: Financing Tables**

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

**STAR allocation?**

Secretariat's Comments (10/25/2023) No STAR allocations requested.

Agency's Comments

**Focal Area allocation?**

Secretariat's Comments

(10/25/2023)

1. The level/amount of focal area allocation is not evident/too high given the current project description.

2. As the source to sea approach is highlighted, please describe more clearly activities for coastal protection and allocate IW-1 funds accordingly.

(11/20/2023)

Comments addressed.

Agency's Comments

**IUCN, 16 November 2023**

1. The area of Focal Area allocation has now been updated ? based on the activities to promote a source-to-sea approach
2. As above ? these activities have been updated under Output 4.2.3

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

Secretariat's Comments NA

Agency's Comments  
**SCCF A (SIDS)?**

Secretariat's Comments NA

Agency's Comments  
**SCCF B (Tech Transfer, Innovation, Private Sector)?**

Secretariat's Comments NA

Agency's Comments  
**Focal Area Set Aside?**

Secretariat's Comments NA

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 (10/25/2023) o.k.

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

(10/25/2023)

1. What is the level of current country contributions to the JWC, if any?
2. Please verify the expected USD 25 million of co-finance from Malawi with only 2 % of the basin area being in Malawi.
3. Please verify that the SADC GMI co-finance from CIWA is not double-counting co-finance to the SADC groundwater project.
4. What is the envisioned cooperation and synergy with the TFCA ? Please describe under coordination.

(11/20/2023) and (11/30/2023)

1. Malawi co-finance is grant and therefore " investment mobilized" should be selected as category.
2. Please take a harder look at the indicative finance and decide if any of these are in fact "in-kind" and "recurring expenditure".
3. Please confirm that the indicative WB co-finance is not already counted as co-finance to a WB GEF project.
4. ?In-kind? is normally classified as ?recurrent expenditures?. Please request the agency to revise the ?investment mobilized? to ?recurrent expenditures? where ?type of co-financing? is indicated as ?in-kind?.

(12/1/2023)

1. **Grant** finance from the three countries should be classified as "**investment mobilized**" - see comment 1 above.

2. CIWA co-finance: If co-finance is "**in-kind**" then "**recurrent expenditure**" should be selected as category.

In doing so, please double check to make sure the type of co-finance is aligned with what is stated in the letters of co-finance.

(12/1/2023)

Comments addressed. Cleared.

#### Agency's Comments

##### **30 November 2023**

1. Updated ? corrected.
2. The co-finance table has been updated to correct they type of indicative finance.
3. The current understanding is that it is being considered for this project this will be further verified during the PPG phase.
4. Corrected ? the in-kind type of co-financing to recurrent expenditure

##### **IUCN, 16 November 2023**

1. Currently there are no direct financial contributions ? however, countries have focal points supporting the activities
2. The Malawi amount ? focuses on Mangochi and Machinga ? relatively populated centers to improve water supply (exact amounts will be rechecked during PPG)
3. SADC GMI co-finance has been removed to be verified during PPG
4. The synergies with the TFCAs ? have now been elaborated throughout a number of activities in the different components

## **Annex B: Endorsements**

**8.4 Has the project been endorsed by the country?(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 (10/25/2023) Yes.

Agency's Comments

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

Secretariat's Comments (10/25/2023) 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

(10/25/2023) Policy related issues will be reviewed when the project is submitted in a form that is closer to being able to be cleared.

(11/20/2023)

The LOE template used for this project removed the footnote that conditions the selection of the executing partner to the following: *?Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate?.* Per email back in March when we were aiming to constitute June 2023 Work Program, Agencies were informed that LoEs *?with modifications cannot be accepted and will be returned?.* While the removal of the footnote seems to be trivial, it is not: this footnote reduces the chances of having an executing partner that does not meet the fiduciary and procurement standards required to safely execute the project.

> Please get an email from each of the OFPs accepting this footnote to be part of the LoE (this is an alternative to request new LoEs).

(12/1/2023) Comment addressed. Cleared.

Agency's Comments

**IUCN 30 November 2023**

The updated letters for Tanzania and Mozambique have been uploaded while a clarificatory email from the OFPs email in Malawi agreeing with the footnote has been uploaded.

**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 NA

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 (10/25/2023) Yes.

Agency's Comments

**Annex D: Safeguards Screen and Rating**

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

Secretariat's Comments

(10/25/2023) 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 (10/25/2023) Yes.

Agency's Comments

**Annex F: Taxonomy Worksheet**

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

Secretariat's Comments  
(10/25/2023) tbd

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 NA

Agency's Comments

**9 GEFSEC Decision**

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



Secretariat's Comments  
(10/25/2023)

No. The project is aiming at strengthening cooperation on the shared Ruvuma basin and could be overall eligible, but the reasoning for prioritizing GEF support and engagement in this basin needs better articulation with respect to how this will be leading to substantial GEBs. This needs better articulation underpinned by data, information and targets in order to recommend the project for consideration for GEF IW finance.

The project is returned to the agency without further policy review given the large needs of revisions.

(11/20/2023) and (11/30/2023)

No. The redrafted PIF has been very much improved. Please address the remaining comments and resubmit.

(12/1/2023) Please see comment on co-finance and resubmit.

(12/01/2023) Comments have all been addressed. The project is technically cleared and recommended for a future work program.

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**

	<b>PIF Review</b>	<b>Agency Response</b>
<b>First Review</b>	<b>10/27/2023</b>	
<b>Additional Review (as necessary)</b>	<b>11/21/2023</b>	

**PIF Review**

**Agency Response**

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