Bananas in Pakistan's Bioeconomy: Transforming Waste into Textile

Basic project information

GEF ID

11172
Countries

Pakistan
Project Name

Bananas in Pakistan's Bioeconomy: Transforming Waste into Textile
Agencies

FAO
Date received by PM

6/25/2024
Review completed by PM

8/29/2024
Program Manager

Anil Sookdeo
Focal Area

Multi Focal Area
Project Type

FSP

CEO

Part I - General Project Information

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

Secretariat comment at CEO Endorsement Request

Please change the region to Asia.

Agency Response

Request was sent to the Portal Help Desk to indicate Asia.

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

Secretariat comment at CEO Endorsement Request

Yes

Agency Response

2. Project Summary.

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

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

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

Secretariat comment at CEO Endorsement RequestThe project summary effectively and concisely presents the problem, objective, strategies, and expected outcomes of the project. It also establishes a clear link with the parent program's goal and approach, demonstrating its relevance and contribution to the broader initiative. it however needs to include the GEBs that will be achieved by the project.

Agency ResponseBased on the review comment, in the project summary project desired GEBs achievements are included. The revision is highlighted with yellow.

3. Project Description Overview

a) Is the project objective statement concise, clear and measurable?

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

c) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

d) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?

e) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
f) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement RequestBased on the provided information, the project design appears to be sound and well-structured. The objective is clear and measurable, the Theory of Change is aligned with the program goal, and the components, outcomes, and outputs are appropriate to achieve the project's aims, however, please slightly expand on the narrative in the Theory of Change to more clearly outline how the component activities were chosen in line with the PFD. In the moment it reads somewhat reversed in logic. Gender, knowledge management, and M&E are integrated into the project design, and the PMC is within the acceptable limit for an FSP.

Agency ResponseThanks for the review comment and appreciation of the project design. Based on the review comment, under the project description (Theory of Change), a short narrative is added on how the component activities were chosen in line with the PFD. The revision is highlighted with yellow.

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

Secretariat comment at CEO Endorsement RequestThe project proposal demonstrates a strong understanding of the current situation in Pakistan, adopting a systems perspective to analyze the environmental challenges and their underlying drivers. The project design is well-aligned to address these challenges, and the roles of various stakeholders, including the private sector and local actors, are clearly defined and integrated into the project's strategy for achieving its objectives and delivering environmental and socioeconomic benefits.

Agency Response

5 B. Project Description
5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?
b) [If a child project under a program] Is the Theory of change aligned with and consistent with the overall program goal and approach?
c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region? [If a child project under a program] Does the

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

Secretariat comment at CEO Endorsement Request

The project proposal presents a well-designed and robust approach to achieving its objectives. The clear articulation of the theory of change, alignment with the parent program, and consideration of various design elements, including gender, knowledge management, and stakeholder engagement, demonstrate a comprehensive and thoughtful approach to project planning and implementation. The project's focus on sustainability, innovation, and transformation positions it well to deliver significant environmental and socioeconomic benefits in Pakistan.

Please include, as relevant, indicators such as number of women trained in finance, entrepreneurship and circular waste management, number of new women-led businesses created number of lines of credit for women, number of women in leadership positions.

Agency ResponseThanks for the review and appreciation of the project design. Under the project description, suggested indicators are added in brief and highlighted with yellow. For more details indicators please also see the result framework under Annex C.

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project

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

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

c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).

d) [If a child project under an integrated program] Does the framework for coordination and collaboration demonstrate consistency with overall ambition of the program for transformative change?

Secretariat comment at CEO Endorsement RequestThe project proposal presents a well-structured approach to institutional arrangements and coordination. The roles of various partners are clearly defined, and the rationale for their involvement is provided. The project's emphasis on collaboration with ongoing initiatives and its focus on knowledge sharing and capacity building demonstrate a commitment to achieving transformative change in Pakistan's textile sector, aligning well with the overall ambition of the parent program.

Agency ResponseThank you for your review and positive feedback.

5.3 Core indicators

a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)? [If a child project under a program] Is the choice of core indicators consistent with those prioritized under the parent program?

b) Are the project?s targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) /adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

The project proposal demonstrates a good understanding of the GEF's core indicator methodology and aligns its choice of indicators with the parent program's priorities. The targeted GEB contributions seem reasonable and achievable, though some assumptions warrant further scrutiny during project implementation.

Project CI 6.5: An EX-ACT assessment was run considering direct GHG benefits from 11,250 hectares of banana plantation under improved practices, comprising reduced tillage, higher carbon input (with manure), and eliminated biomass burning. Indirect benefits were calculated from avoided cotton production of 330 ha assuming full tillage, low carbon input (no manure), and retention of residues. In addition, estimated reduction of fertilizer inputs and diesel inputs from SAP during banana cultivation was also considered.

Analysis

Direct avoided GHG emissions in the CEO stage are 138.4% higher than what was reported at the PIF stage. The portal form provides the assumptions made in the EX-ACT tool, but the assessment itself couldn?t be found in the documents section of the project.

A minor comment: please clarify why 330 ha of avoided cotton production was selected. It would help to know how many hectares of banana plantation may be required to produce a similar yield with the pseudostem to a cotton plantation.

Agency Response

The EX-ACT file is uploaded. Besides, following explanation is also added in the ProDoc to explain the rationale for avoiding cotton cultivation area. This is highlighted with yellow.

Please note that the 330 ha avoided cotton calculations were based on the numbers at the CN stage, which have been slightly adjusted at the PPG stage to 320 ha of avoided cotton.

The GEB estimates avoided pesticide application from the substituted amount of cotton lint. The total area under cotton cultivation is 2,700,000 ha. Typical yields are 667 kg/ha of raw cotton of which ginned cotton lint typically comprises 40%, equating to 267 kg lint/ha. It is assumed there is a direct 1:1 w/w substitution rate of banana fibre to cotton lint. In year 6, it is calculated that 85,406 kg of cellulosic banana fibre can be produced based on number of the pseudostem and fibre yield from one pseudostem, and accordingly, it will avoid the same quantity of cotton. Considering 267 kg lint/ha, total cotton cultivation avoided therefore is 320 ha.

Due to the adjustment of 320 ha, GHG emissions estimation is also updated and highlighted with yellow color in the core indicator table, project summary, global environmental benefits, and result framework.

5.4 Risks

a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?

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

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

Secretariat comment at CEO Endorsement Request

There are a few areas where the risk assessment could be strengthened:

Specificity: Some risk descriptions and mitigation measures could be more specific and detailed. For example, the mitigation measure for the risk of "decreased local support due to shifted priorities" is to focus on communication that underlines the long-term benefits of the project. While this is a valid strategy, it could be enhanced by outlining specific communication channels and target audiences.
Omissions: The risk assessment could consider additional potential risks, such as those related to the technical feasibility of banana fiber extraction and processing, market demand for banana fiber products, and potential social conflicts arising from the project's interventions.
b) Risk Rating and Residual Risk
The risk ratings provided in the proposal generally seem to reflect the residual risk after considering the proposed mitigation measures. For instance, the overall risk rating is "Moderate," which seems appropriate given the potential challenges associated with implementing a transformative and innovative project in a complex context. However, the risk ratings for some specific risks could be debated. For example, the "Technological Risk" is rated as "Low," which might be optimistic considering the innovative nature of the project and the potential for unforeseen technical challenges.

c) Environmental and Social Risks
The proposal includes an Environmental and Social Impact Assessment (ESIA) report in Annex I, which assesses the potential environmental and social risks and impacts of the project. The assessment covers various aspects, such as land use, water resources, biodiversity, and community health and safety. The project is classified as having a "Moderate" environmental and social risk, and specific management measures are outlined to address the identified risks and impacts. The assessment seems adequate and the risk rating appears justified based on the project's activities and context.

Agency Response

Further explanation is added outlining the specific communication channels and target audiences. The revision is highlighted with yellow colour in the Risk table under Financial and Business Model risk category.

Based on the review comment further explanation is added for the Technological risk category and highlighted with yellow colour in the risk table. Besides, under the Environment and Social risk category explanation on potential risks is also added and highlighted in the risk table.

b) The technology rating is rated as low, because banana fibre extraction was conceptualized in 2012. However, it commercialized in 2020 under the initiative of the Volunteer platform Textile Sustainable Working Group thereafter sensitization of banana fibre extraction started in Pakistan. At present the widest use of banana fibre is in the making of ropes and cordage for use in shipping and transport. The strength and E-modulus of the banana fibre are being used in fishing nets. Furthermore, the textile products that can be manufactured from coarser yarns like socks, working gloves, woven fabrics, packaging/Burlap bags, paper sheets, etc. can be manufactured from banana fibre. Mahran University of Engineering and Technology Sindh (MUET) has developed leather from

a banana like shoes, bags, belts, face masks, footwear, sanitary pads, and women's scarfs, etc. has developed but these products are in the trial phase of consumer approval. Similarly, UAF has developed products from banana and Cecil fibre but so far nothing has been commercialized, as well as UET Faisalabad in conjunction with Interloop Pvt Ltd has developed technology for the use of banana fibre in textiles and the products like sports socks, jeans, and bags are in the trial phase. So far industrial use of banana fibre has not been realized in Pakistan through having potential for the use in textile, leather, and paper industry or for use in burlap bag manufacturing.

Based on the risk rating, the design team has prepared the environmental and social analysis and risk management plan.

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

Secretariat comment at CEO Endorsement Request

Agency Response

6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities
6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?
b) [If a child project under an integrated program] Is the project adequately aligned with the program objective in the GEF-8 programming directions?

Secretariat comment at CEO Endorsement RequestThe project demonstrates a clear and coherent alignment with both the relevant Focal Area objectives and the parent program's goals, enhancing its potential to deliver significant environmental and socioeconomic benefits in Pakistan.

Agency ResponseThank you for your review and positive feedback.
6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors).

Secretariat comment at CEO Endorsement RequestYes

Agency Response

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

Secretariat comment at CEO Endorsement Request
The project explicitly identifies its contribution to the following targets of the Kunming-Montreal Global Biodiversity Framework:

Target 7: Reduce pollution to levels that are not harmful to biodiversity. The project aims to achieve this by minimizing chemical leakage into surrounding ecosystems through the reduced use of pesticides and fungicides in banana cultivation and the elimination of plastic burning.
Target 8: Minimize the impacts of climate change on biodiversity and build resilience. The project addresses this target by promoting sustainable agricultural practices and reducing greenhouse gas emissions, thereby contributing to climate change mitigation and enhancing the resilience of ecosystems and biodiversity.
Target 10: Enhance biodiversity and sustainability in agriculture, aquaculture, fisheries, and forestry. The project's focus on sustainable banana cultivation practices and the reduction of chemical inputs directly contributes to enhancing biodiversity and sustainability in the agricultural sector.
The project proposal clearly articulates how its interventions, such as promoting Integrated Pest Management (IPM) and Sustainable Agricultural Practices (SAPs), and reducing reliance on chemical-intensive cotton production, will directly contribute to achieving these targets. It also quantifies the expected biodiversity benefits through the estimated reduction in chemical leakage and the avoidance of land conversion for cotton cultivation.

Agency ResponseThank you for your review and positive feedback.

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request The SEP outlines stakeholder groups and organizations but provides only tentative information on their role and responsibilities related to project components and outputs. For example, on NGOs/Civil Society Organizations ? it only says ?They can be involved in establishing linkages with the smallholders, vulnerable communities, and women. Representatives from these organizations can be included as PSC members? It is expected at the CEO Endorsement stage that that more detailed information is provided on the expected roles as well as means and timing of engagement. Agency should provide further details in the SEP stakeholder engagement during project implementation.

Agency Response

Based on the review comment, during project implementation following strategies will be adopted for stakeholder engagement:

? Involvement of Key Stakeholders such as, Agriculture Department of Sindh, SEPA, and National Textile University in programs and activities.

? Effective communication - Focal Persons to coordinate activities, ensuring effective communication and accountability.

? Workshops and Consultations - Regular engagement activities to update stakeholders on project progress and integrate feedback, ensuring transparent decision-making processes and reducing grievances.

Capacity building & Outsourcing activities to community organizations to enhance ownership of the Banana Fiber Project.

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

8 Annexes

Annex A: Financing Tables

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

STAR allocation?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Focal Area allocation?

Secretariat comment at CEO Endorsement Request

Agency Response

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement Request

Agency Response

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

Focal Area Set Aside?

Secretariat comment at CEO Endorsement Request

Agency Response

8.2 Project Preparation Grant (PPG)

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

Secretariat comment at CEO Endorsement RequestYes

Agency Response

8.3 Source of Funds

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

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

Secretariat comment at CEO Endorsement RequestYes

Agency Response

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

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

Secretariat comment at CEO Endorsement Request

Yes

Please note the letter cofinancing support from Small and Medium Enterprises Development Authority (SMEDA) indicates ?in-kind? as source of cofinancing. Please revise grant to in-kind in the portal.

Agency ResponseThis has been corrected in the Portal.

Annex B: Endorsements

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

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

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

Annex C: Project Results Framework

8.6 a) Have the GEF core indicators been included?

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

c) Are all relevant indicators sex disaggregated?

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

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

Secretariat comment at CEO Endorsement Request

The Project Results Framework is generally well-designed and includes relevant indicators and means of verification. However, there is room for improvement in sex-disaggregation and target ambition. Additionally, the inclusion of program-wide metrics could enhance the monitoring and evaluation of the project's contribution to the parent program's goals.

Limited Sex-Disaggregation: While the core indicator on "People benefiting from GEF-financed investments" is sex-disaggregated, other indicators in the results framework lack this disaggregation. Given the project's emphasis on gender equality and women's empowerment, it would be beneficial to include sex-disaggregated data for other relevant indicators, such as the number of training participants and the number of people benefiting from improved agricultural practices.

Inclusion of Program-wide Metrics: The child project's results framework does not explicitly include program-wide metrics monitored across child projects by the Regional/Global Child project. While the core indicators align with the parent program's objectives, it might be beneficial to include additional program-level indicators to track the project's contribution to the broader program goals more comprehensively.

Agency Response

Based on the review comment gender-disaggregated indicators are added in the Project Results framework and highlighted with yellow.

The program-wide metrics and mapping of contribution to the program-level indicators are included in the table ?outcome and output level indicators? of the ProDoc under Annex C, which make explicit references to the program-level indicators. These will be further developed to align with the programmatic methodology and utilize the toolkit that the Lead Agency have indicated will be developed during the Global Launch scheduled for Q4 2024.

Annex E: Project map and coordinates

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

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Annex F: Environmental and Social Safeguards Documentation and Rating

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

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Annex G: GEF Budget template

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

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

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

Secretariat comment at CEO Endorsement Request

Yes

a. Finance/Admin Officer should be charged 100% to PMC but not to project component. Please revise the budget.

b. Office equipment and furniture should be charged 100% to PMC but not to project component. Please revise the budget.

Agency Response

(a) Based on the review comment, the Finance/Admin Assistant is charged 100% to PMC.

The title of the position is also changed. This is highlighted with yellow colour in Annex L. The associated change in the budget is also highlighted with yellow.

(b) Office operation (stationery, internet, office transportation costs, & other utilities, etc) and furniture for the project is 100% allocated to PMC. But Communication equipment (cameras, palmtops, etc), as well as Printers & photocopiers also charged to project components, because those will be also used during different events organized under the four components. This revision is highlighted with yellow in the budget.

To accommodate the above review comments related change, some other budget items are also updated. These changes are also highlighted with yellow in the budget.

Annex H: NGI Relevant Annexes

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

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

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

Secretariat comment at CEO Endorsement Request

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement RequestSeptember 6, 2024 - Please respond to the review.

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

Secretariat comment at CEO Endorsement RequestDuring project implementation, for PIRs, MTR and TE, to include a review and reporting of the GAP and relevant gender dimensions of the project.

9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	**9/6/2024**	
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		