

Implementing Ecosystem-based Management in Ecologically Critical Areas in Bangladesh

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

9913

Countries

Bangladesh

Project Name

Implementing Ecosystem-based Management in Ecologically Critical Areas in Bangladesh

Agencies

UNDP

Date received by PM

5/29/2019

Review completed by PM

3/5/2020

Program Manager

Jaime Cavelier

Focal Area

Biodiversity

Project Type

FSP

PIF ☐

CEO Endorsement ☐

Project Design and Financing

1. If there are any changes from that presented in the PIF, have justifications been provided?

Secretariat Comment at CEO Endorsement

6-4-19

Cleared

Test

Response to Secretariat comments

2. Is the project structure/ design appropriate to achieve the expected outcomes and outputs?

Secretariat Comment at CEO Endorsement

6-4-19

It is difficult to see how the project is going to deliver the objectives when the project is proposing to carry-out so many activities and deliver so many outputs, . The GEF kindly request to substantially reduce the nearly 50 activities under 11 outputs to a manageable number. Please also use plain English (no Conservation and Development jargon) to described the proposed interventions so it is possible to visualize at a glance what the project is intending to do, and more importantly, for the coordinating unit and executing partners on the ground to fully understand what is that they have to do.

The following entries were made during the first review of the PIF. While the PIF was technically based on the response matrix and a revised PIF, there are a number of issues that re-emerged in the CEO Endorsement. Below are the entries at PIF stage and in **CAPITALS and BOLD** the issues that remained and need to be addressed.

1) *The project has a strong Top-Down design (CONTINUES TO BE THE CASE SPECIALLY FOR COMPONENT 1&3). While this is not necessary bad, one would expect to see the Local Communities more directly involved in the design as this dictates the benefits to be received at the ground level (CONSIDERING THE NATURE OF THE PROPOSED INTERVENTIONS - SPECIALLY FOR COMPONENT 2. WERE THE INTERVENTIONS IN THIS COMPONENT DISCUSSED AND AGREED WITH THE COMMUNITIES?) Please look at the list of Stakeholders on p. 14. The project is loaded with soft interventions (frameworks, coordination, planning, strategy, reforms, system, etc.) with very little direct interventions except output 2.2.3 This approach is likely to render a number of documents that may never see the light of implementation because of the lack of funding. While at least one of the outputs aims at resolving this matter (1.1.3), the reading of the project continues giving the impression of well intended interventions at the highest of level with little chance of getting implemented on the ground (THIS HAS NOT BEEN ADDRESSED IN FULL. PLEASE ONLY KEEP THE MUST-DO ACTIVITIES).*

2) *There are 13 ECAs and a new one being proposed. Of these, only six have received attention in projects that date back to 1988. Its difficult to believe that this project of \$3,046,347, will have measurable impacts on the ground for all 13 ECAs totaling 395,229 hectares (In Table F) and 379,021 hectares on Annex 1. The GEF understands that the proposed activities are being presented because they have the potential to deliver benefits to all ECAs. While this is true in theory, it is not in practice because the top-level activities are unlikely to trickle down to the ECAs themselves. No funding to get the job done (THIS HAS BEEN PARTIALLY ADDRESSED WITH THE REDUCTION OF TARGET SITES TO 2 ECAs. NEVERTHELESS, HOW ARE THESE INTERVENTIONS GOING TO TAKE PLACE WHEN ALL FUNDING IS ON TECHNICAL ASSISTANCE?). After presenting this argument, the GEF suggest restructuring the project with a more limited number of activities at the top, (CONTINUES TO BE THE CASE - PLEASE ADDRESS IN THIS CEO ENDORSEMENT), fewer ECAs (THIS HAS BEEN ADDRESSED WITH THE REDUCTION OF ACTIVITIES TO 2 ECAs. THANKS) and more detailed interventions on the ground CONTINUES TO BE THE CASE - PLEASE ADDRESS THIS IN THE CEO ENDORSEMENT.*

3) *If the project consider essential some of the elements listed below, please explain in plain English what the following concepts will look in reality once implemented and how the Local Communities will benefit. Include these clarifications in the text, as the Response to GEF Comments will be left behind at one point. "Ecosystem-based management framework", "Ecological Framework for effective planning", "Strategic Environmental Assessment" (same as EIAs?), "Monitoring Systems", "web-based information and monitoring systems for ECA", "Communications Strategy and Action Plan". THE CEO ENDORSEMENT CONTINUES TO BE LOADED WITH BUZZWORDS THAT ARE MOST LIKELY MEANINGLESS FOR THE LOCAL COMMUNITIES. HERE ARE SOME OF THOSE*

TERMS TAKEN FROM COMPONENT 2 WHICH RELATES TO THE TARGET ECAs (*ECONOMIC VALUATION OF ECOSYSTEM GOODS AND SERVICES; IV) ECONOMIC EVALUATION AND UNREALIZED OPPORTUNITY COSTS ASSESSMENT; IDENTIFY POTENTIAL PAYMENT FOR ECOSYSTEM SERVICES (PES) OPPORTUNITIES; APPLY ECOLOGICAL MONITORING FRAMEWORK TO THE TWO ECA SITES*). PLEASE ADDRESS THIS MATTER.

4) Under component 2- Please be more specific what type of activities will be implemented on the ground for improvement of communities livelihood thanks to the proposed ecosystem based framework. **CONTINUES TO BE THE CASE.**

THE GEF KINDLY REQUESTS TO ADDRESS THESE ISSUES.

7-18-19

Cleared

Response to Secretariat comments

UNDP Response, 27 June 2019

It may be helpful to summarize in plain English what the project is intending to do so that it can be “visualize[d] at a glance”: [Paragraphs 50-51 of UNDP Project Document \(p.29\) and Section A.5 of GEF CEO ER \(p.7-9\)](#)

- ECAs have been subject to project interventions for 20+ years and, while their conservation status has improved to some extent in about half of them (others not having benefitted from such projects), they continue to be project dependent (i.e. sustainable solutions have yet to be realized).
- The fundamental issue is enforcement of the law, based on the “polluter pays” principle.
- To be able to enforce the law, the responsible authority (Department of Environment) needs to know:
 - ü the ecological status of the wetland (all ECAs are wetlands, to date) and whether or not that status is changing for better or worse under the existing management regime/lack of management scenario;
 - ü the prior healthy status of the ECA before it became ecologically degraded, including the species and/or habitats for which it is nationally/globally important for biodiversity conservation and provision of ecosystem services; and
 - ü the measures necessary to restore and/or maintain the ECA to good ecological condition.
- Based on this knowledge, the DoE is then able to prescribe the management measures necessary for the wetland owner/manager/user to restore and/or maintain the good condition of the wetland.

- Having agreed the management prescriptions, which form the basis of the ECA management plan, DoE monitors the status of the wetland to ensure that its good condition is being maintained or attained within a specific timeframe. Such monitoring provides DoE with ability to track implementation of the management agreement and, if necessary, penalize the responsible party for non-compliance. In the case of 3rd parties polluting an ECA wetland, for example, such impacts will show up in the monitoring and polluters can be brought to justice once the DoE is able to identify the source of such pollution.
- Underpinning the monitoring, therefore, is a hydrological framework that provides a set of national standards for wetland ecosystems, based on physical (e.g. water clarity), chemical (e.g. levels of oxygen and pollutants such as nitrogen and phosphorus) and biological (e.g. algal mats, aquatic plants and animals) indicators that can be applied to individual ECAs.
- It is this hydrological framework that needs to be developed and adopted under the county's ECA legislation via the ECA Management Rules (Component 1), applied to the two project sites by way of demonstration (Component 2) and institutionalized (Component 3).
- A further dimension to this particular GEF-6 project is its engagement with the private sector, something not previously addressed in previous ECA projects but a necessary ingredient of a holistic approach to ECA management, given that the private sector is a significant polluter of some ECA wetlands. Hence, the focus on Halda River, heavily polluted by industry and proposed as an ECA

Thus, in response to the Secretariat's comments above:

1) The project may be perceived as having a "strong top-down" approach, given the fundamental importance of introducing a sound scientific approach to ECA management that can be applied across the ECA network in a consistent manner and used as a basis for enforcing compliance with the management measures prescribed by DoE in consultation and agreement with the wetland owner(s). Stakeholders, particularly local communities, need to be introduced to this science as part of the management planning process and their practical experience in managing their wetlands for agricultural, fishery and other purposes should be taken into account and contribute to design of management interventions. The management planning process should be envisaged as a meeting between scientist and practitioner, respectively bringing the technical knowledge and local experience together. [Paragraph 89 of UNDP Project Document \(p.41\)](#)

Building the scientific capacity and expertise of DoE in respect of wetland restoration and management (Component 3) is also fundamental to enabling it to fulfill its mandate with regard to ECAs, while recognizing that its enforcement role needs to be tempered by consolidating its partnerships with the local administrations and communities, providing technical guidance, advice and assistance as appropriate.

[Paragraph 111 of UNDP Project Document \(p.48\)](#)

2) Local communities at four candidate target sites were consulted during the PPG, of which two (Halda River and Morjat Baur) had been identified previously in the PIF and Hakaluki Haor and Jaflong-Dawki had been tentatively added - given that Cox's Bazaar-Teknaf Pensinsular (listed in the PIF) was no longer an option because it had become a destination for Rohingya refugees fleeing from Myanmar. Consultations were limited to receiving feedback on the condition of these wetlands and on interventions that would be welcomed. This feedback informed the stakeholder consultation held on 28 July 2018, at which the Implementing Partner (Ministry of Environment, Forest and Climate Change) agreed to reduce the number of target ECAs to two wetlands in accord with the GEF Secretariat's comments on the PIF ([refer to Annex 21](#)). However, there was little subsequent opportunity to engage local communities in the design of the activities and it will be important to consolidate the earlier consultation process during project inception, [Paragraph 44 of UNDP Project Document \(p.24\)](#)

3) With regard to “top-level activities” being unlikely to trickle down to the ECAs themselves, as commented at PIF stage, and the subsequent comment that while this has been partially addressed by reducing the number of target sites to two ECAs, “how are these interventions going to take place when all funding is on technical assistance?”:

- ü As explained in the above summary of the project’s concept, a key part of this project is the technical development of a hydrological framework that comprises physical, chemical and biological standards to be met to ensure that ECA wetlands are maintained in good condition. This Output (1.1, [p.33](#)), funded as part of the technical assistance, not only underpins everything to be delivered under Component 2 (target sites) but also provides the opportunity for such an approach to be mainstreamed across other ECAs as opportunities (funding) arise. Such opportunities do exist, for example massive investments are being made in the Sundarbans, where the core area is buffered by an ECA, and the critical wetland zones of North-Eastern Bangladesh (refer to Section A.6 of the ER, [pp.10-12](#)). Thus, this GEF investment is providing government with the catalyst (Output 1.1, applied across two target sites under Component 2) necessary to mainstream this approach across the ECA network.
- ü Thus, the future outlook for DoE is much more financially sustainable with respect to ECAs once it has the hydrological framework in place and successfully applied to the target sites, it can then focus on mainstreaming this approach of monitoring wetland condition and enforcing compliance, while owners of these wetlands are held responsible for ensuring that good hydrological condition is attained and maintained. Mindsets and behavior will also change as DoE increasingly develops its technical monitoring capacity to enforce the ‘polluter pays’ principle.

- ü Furthermore, the project design has been modified since the PIF to ensure that DoE has the technical competence (institutional capacity) to drive forward the mainstreaming of this ecosystem-based approach across all ECAs by establishing an ECA Management, Monitoring and Compliance Unit (MMCUC) that will focus on benchmarking of the status of ECAs and identifying what measures need to be taken to restore them to ‘favorable’ conditions (or better) and setting targets within specific timeframes ([Output 3.2, p.49](#)).

Within the above context and taking into account the GEF Secretariat’s call for some restructuring and fewer but more detailed interventions on the ground, the number of outputs have been reduced from [12 to 10](#) and activities reduced to [35](#). In particular, the following changes have been made:

- ü [GEF CEO ER Output 2.1 \(p.39\)](#) changed to Assessment of current ecological conditions in target sites to inform their future management (for simplification as against the previous activities related to Strategic EIA, Economic evaluation, etc.)
- ü [PIF Output 3.4](#) of national spatial web-based system excluded to avoid duplication as monitoring of ECAs already included in Output 3.1)
- ü While activities have been reduced to simplify the project, activities listed in most cases are not separate actions, but a sequencing of steps towards achievement of particular actions.

4) “Buzzwords”, particularly in relation to the target site interventions under Component 2 have reviewed and either explained up-front, changed or simplified.

- ü Strategic EIAs excluded
- ü Ecological framework explained
- ü Web-based information systems excluded
- ü Monitoring systems simplified
- ü Communication strategy and action plan is necessary part of creating awareness amongst local communities and stakeholders and part of the strategy to increase their participation in improving the ecological status of the ECAs

Where possible, more specific activities have been identified for implementation on the ground to improve community livelihoods. Some activities have already being identified for improving community incomes. e.g. medium, micro and small industries (MMSEs), women-based cottage industries and handicrafts, floating gardens for vegetables, biogas production, ecotourism, etc. but further defining of MMSEs, ecotourism and other livelihood activities will vary from village to village and would require further consultation with communities at project inception in keeping the participatory nature of the project. Additionally, improved water condition is expected to improve fish production, egg collection and improve irrigation facilities thereby contributing to further income opportunities. [These are detailed in Output 2.3 of UNDP Project Document \(pp.44-46\)](#)

UNDP Project Document Section IV “Results and Partnerships, Part i “Expected Results” ([from pp. 28](#)) and GEFCEO ER Section A.5 “Global Environmental Benefits” ([from pp. 7](#)) (all changes highlighted in YELLOW)

3. Is the financing adequate and does the project demonstrate a cost-effective approach to meet the project objective?

Secretariat Comment at CEO Endorsement

6-4-19

It is not possible to understand how the project aims at delivering the restoration of 11,025 ha of wetlands with Technical Assistance only.

Please move the key Global Environment benefits from the Annex to the Body of the CEO Endorsement. As currently presented in the CEO Endorsement text, this project does not justify the use of GEF's BD \$3.0 million. This has been a weakness since the PIF stage. When moving the BD GEBs to the body of the text, please make sure that the proposed activities related to the conservation of BD assets. At present, it gives the impression that the project is more about water restoration and management, than biodiversity driven.

The GEF strongly suggest reducing the budget of Components 1 & 3 and increase the allocation of funds to Component 2.

7-18-19

Cleared

NOTES AFTER INITIAL TECHNICAL CLEARANCE

These observations follow the recent communication from the GEF Secretariat to the Agencies regarding charges to the Components and PMC.

1. The project is charging percentages of the salary of the Project Manager to the Components (Contractual Services - Individual - Notes 2,6 and 15). The salary needs to be charged to the PMC.
2. The project is charging the Stakeholder Engagement Plan and the Gender Plan to the M&E. These charges needs to be removed because these two items are presented as part of the CEO Endorsement.
3. What is "Mobile Laboratory for monitoring" for \$90,000 (Note 20).
4. Please confirm that UNDP's role in this project will be limited to those as a GEF Agency as described in the GEF PMC Guidelines.

11-18-19

In the Project Document, please remove ".....under UNDP's National Implementation Modality (NIM). Thanks.

ii. Partnerships

121. This proposed GEF project will be implemented by UNDP in partnership with the Ministry of Environment and Forests, specifically its Department of Environment, under UNDP's National Implementation Modality (NIM).

50

1-6-20

Cleared

OBSERVATIONS ON BUDGET AFTER INITIAL TECHNICAL CLEARANCE

2-7-20

1. Executing Partner. Please remove UNDP from this field, leaving the Ministry

Other Executing Partner(s):	Executing Partner Type
UNDP; Ministry of Environment & Forests	GEF Agency

Audit is an ineligible expense under M&E – Please charge the Audit to PMC.

GEF M&E requirements	Primary responsibility	Indicative costs to be charged to Project Budget ¹⁵ (US\$)		Time frame
		GEF grant	Co-financing	
Risk management	Project Manager with support of Technical Coordinator Country Office	None	None	Quarterly, annually
Monitoring of indicators in project results framework	Project Manager with support of Technical Coordinator	USD 10,000 [USD 2,000 /year]	USD 5,000 [USD 1,000/year]	Annually before PIR
GEF Project Implementation Report (PIR)	Project Manager and UNDP Country Office and UNDP-GEF team	None	None	Annually
NIM Audit as per UNDP audit policies	UNDP Country Office	USD 10,000 [USD 2,000/year]	None	Annually or other frequency as per UNDP Audit policies

3. A National Technical Coordinator is charged to the three project's components – in absence of TORs, it is not possible to determine whether this position will somehow contribute to managerial tasks, in which case some portion might be charged to PMU. Please provide in ProDoc the respective TORs so GEF can decide whether the current distribution among the components is appropriate and / or if some portion should be charged to PMC (note: PMC includes the GEF portion + the co-financing portion – for this project the amounts are \$145,000 and \$525,000 respectively).

GEF Component/Atlas Activity	Responsible Party/	Fund ID	Donor Name	Atlas Budgetary Account Code	ATLAS Budget Description	Amount Year 1 (USD)	Amount Year 2 (USD)	Amount Year 3 (USD)	Amount Year 4 (USD)	Amount Year 5 (USD)	Total (USD)	See Budg et Note
	(Atlas Implementin g Agent)											
COMPONENT 1												
Designing a financially viable, ecosystem-based management framework for Ecologically Critical Areas (ECAs).	MOEFCC	62000	GEF Trustee	71300	Local Consultant	50,000	50,000	50,000	50,000	0	200,000	1
		62000	GEF Trustee	71400	Contractual Services - Individual	25,920	25,920	25,920	25,920	25,920	129,600	2
		62000	GEF Trustee	71600	Travel	5,000	7,000	8,000	8,000	7,000	35,000	3
		62000	GEF Trustee	75700	Training, Workshops and Conferences	7,800	7,800	7,800	7,800	7,800	39,000	4
					Sub-Total Component 1	88,720	90,720	91,720	91,720	40,720	403,600	
COMPONENT 2												
Applying an ecosystem-based framework to effectively plan, manage, finance and monitor compliance with target ECAs	MOEFCC	62000	GEF Trustee	71300	Local Consultant	12,000	12,000	12,000	8,000	6,000	50,000	5
		62000	GEF Trustee	71400	Contractual Services - Individual	38,880	38,880	38,880	38,880	38,880	194,400	6
		62000	GEF Trustee	72100	Contractual Service - Companies	165,000	270,000	270,000	250,000	180,000	1,135,000	7
		62000	GEF Trustee	71600	Travel	6,000	7,000	7,000	7,000	7,000	34,000	8
		62000	GEF Trustee	73400	Rental & Maint of Other Equip	10,000	10,000	10000	10000	10000	50,000	9

COMPONENT 3												
		62000	GEF Trustee	71200	International Consultants	-	-	18,000	-	24,500	42,500	13
		62000	GEF Trustee	71300	Local Consultant	-	-	8,000	-	12,000	20,000	14
		62000	GEF Trustee	71400	Contractual Service - individuals	21,600	21,600	21,600	21,600	21,600	108,000	15
		62000	GEF Trustee	72100	Contractual services - Companies	14,000	11,000	10,000	10,000	10,000	55,000	16
		62000	GEF Trustee	71600	Travel	6,000	8,000	13,000	8,000	12,783	47,783	17
		62000	GEF Trustee	75700	Training, Workshops and Conferences	12,000	3,000	3,000	3,000	7,000	28,000	18
		62000	GEF Trustee	72800	IT Equipment	10,000	20,000	8,500	500	5000	44,000	19
					Sub-Total Component 3	63,600	63,600	82,100	43,100	92,883	345,283	
Project management												
Project Management Unit	MOEFCC	62000	GEF Trustee	71400	Contractual services- Individual	26,000	26,000	26,000	26,000	26,000	130,000	20
		62000	GEF Trustee	72800	IT Equipment	7,000	3,000	-	-	-	10,000	21
		62000	GEF Trustee	72500	Office Supplies	1,000	1,000	1,000	1,000	1,000	5,000	22
					Sub-Total Project Management	34,000	30,000	27,000	27,000	27,000	145,000	
GRAND PROJECT TOTAL						578,200	651,200	674,764	610,700	531,483	3,046,347	

2	Contractual Services - Individual
	(i) National Technical Coordinator: 30% of 60 months (@ \$4,000) allocated to C1 to oversee and facilitate delivery of ecosystem-based framework for ECAs, its application to target sites, institutionalization within hierarchy of ECA Committees supported by legal reforms and sustainable financing for ECAs. \$ 72,000 (ii) Community Development Associates (2) – Mariat Baor and Halda River Technical Coordinator: 30% of 60 months (@ \$ 1600 per month). Output 1.1 and lead Output 1.2. = \$ 57,600 TOTAL = \$129,600
6	Contractual Services – Individual
	(i) National Technical Coordinator: 45% of 60 months (@ \$4,000) allocated to C2 to oversee development and delivery of ecosystem-based management plans and associated monitoring, action and financing plans for project sites; and mainstreaming across other ECAs (Outputs 2.1. and 2.2). Total \$108,000 (ii) Community Development Associates (2) – Mariat Baor and Halda River for 60 months: 45% of 60 months (@ \$ 1600 per month). Output 2.1 and 2.2 Total \$ 86,400
15	Contractual Services – Individual
	(i) National Technical Coordinator: 25% of 60 months (@ \$4,000) allocated to C3 principally to oversee design and development and delivery of Communications Strategy & Action Plan (Output 3.1), modular training program (Output 3.3) and ECA Information System (Output 3.4)- USD 60,000 (ii) Community Development Associates (2) – Mariat Baor and Halda River for 60 months. 25% of 60 months (@1600 per month). Total USD 48,000 TOTAL = \$108,000
20	Contractual Services – Individual (i) Project Manager for 60 months (@ \$ 2,000 per month) = \$120,000; (ii) Audit Services for 5 years (@ \$ 2,000 per year = \$10,000. TOTAL = \$130,000

2-21-20

1. Number one (1) above has not been taken care of (see below that the same entry remains).

Other Executing Partner(s):

UNDP, Ministry of Environment & Forests

Executing Partner Type

GEF Agency

2. Items 2 and 3 in the previous review have been solved.

3-5-20

Cleared

Response to Secretariat comments

UNDP Response, 27 June 2019

Thank you for the comments. Justification are provided hereunder and incorporated in the UNDP ProDoc and CEO ER documents:

In the global environment benefits [Table 2 of Project Document \(p.29\)](#) and [Table B of GEFCEO ER \(p.1\)](#) it is stated: “Ecosystem-based framework developed and applied to two ECAs, resulting in 11,025 ha of wetlands being managed in compliance with criteria that will result in favorable ecological condition being achieved on the long-term. The key point here is that management measures are in place and being complied with, to the extent that the wetland will be restored but this may not be within the life of the project. Cleaning up point-source pollution (e.g. industrial pollution from chemical effluents and addressing issues arising from discharge of untreated sewage into waterbodies) will result in fairly immediate improvements in water quality during the life of the project, benefiting aquatic plants and animals, as well as human and livestock health. Diffuse sources of pollution are much more difficult to address and take much longer to control because interventions have to be at the catchment scale, as much of it relates to run-off of water polluted by chemicals and also sediment from soil erosion.

Thus, the project is very much about introducing the technical compliance measures to restore wetland ECAs that can be applied across the ECA network, while also setting up/applying these measures at two sites to demonstrate how such measures can be applied. Hence, there needs to be a significant level of technical assistance.

That said, actual delivery of the restoration work will be achieved at the local level, with communities playing an active role. In the case of Halda for example \$250,000 is planned for strengthening the existing patrolling system, most of which is delivered by community members.

The key determinant of the biology in the wetlands is a function of hydrological factors and hence the restoration and maintenance of the favorable hydrological condition is key to maintenance of ecosystems and species, hence the emphasis on enhancing and improving water quality. A number of activities relating to biodiversity is proposed such as (i) ensuring sustainable harvest of fish species so as to help maintain healthy aquatic species populations; (ii) removal of water

hyacinth so as to enhance environmental conditions for aquatic species and ecosystems; (iii) community funding for conserving habitats and feeding and nursery grounds for the Gangetic Dolphin (Halda river) and aquatic species (Morjat Baor); (iv) community patrolling and monitoring; etc. In addition, all other activities (dredging, pollution control, irrigation water extraction, reduction of waste inflows, etc. have direct consequences on the biology and ecology of the water bodies) *Please refer to Output 2.3 (pp.44-46)*

The BD values are now reflected in the text of the UNDP Project Document (*Paragraph 48, p.28*) and GEFCEO ER (*Section A.5, p.8*)

Reference to the budget proposed in the PIF and that realized in the ER shows some increase in Component 2 from PIF values. While, a significant percentage (70%) of the budget is allocated to Component 2, we felt that it is equally important that fundamental processes are in place as part of Component 1 to facilitate the development of national policy, legislation and systems to enable learning and replication of the project success to other ECAs in the country (under Component 3), so that the project will have a catalytic effect within the country. It must be recognized that although ECAs have been subject to project interventions for 20+ years to some extent in about half of them (others not having benefitted from such projects), they continue to be project dependent (i.e. sustainable solutions have yet to be realized). Thus the GEF-6 project aims to develop a national generic ecological framework that could set the standards for defining measures for improving favorable conditions and putting in place capacity within DoE to define management measures and monitor progress towards achieving favorable status and introducing legislation to be able to enforce the ‘polluter pay” principle to penalize violators that could serve as a deterrent. Building such a national system to assess status of ECAs, identify management options to achieve favorable conditions and monitoring and enforcement of such measures to be piloted in the two project sites can serve as the basis for replication in the country, rather than continue to promote a project dependent approach. As a consequence, activities within Components 1 and 3 are necessary to ensure a national system for effective management of ECAs, monitoring and enforcement that does not continue to be dependent on external financing for replication and sustainability. Even so, it is clear that costs for Components 1 and 3 are significantly smaller than that allocated for investments under Component 2.

Component	PIF (US\$)	% Total	ER (US\$)	% Total
1	400,000	13%	403,600	13%
2	2,001,283	66%	2,162,400	71%
3	500,000	16%	335,283	11%
Management	145,064	5%	145,064	5%
Total	3,046,347	100%	3,046,347	100%

UNDP Project Document Section IV “Results and Partnerships” and GEFCEO ER Section A.5

UNDP Response, 18 November 2019:

1. The project is charging percentages of the salary of the Project Manager to the Components (Contractual Services - Individual - Notes 2,6 and 15). The salary needs to be charged to the PMC.

The Project Manager’s costs and Audit costs have been moved to PMC. The role of the Project Manager will be to oversee the administration and financial management of the project, while the technical aspects of the project have been assigned to a national Technical Coordinator, as was envisaged in Annex 2 Key Project Staff, who will support the Project Manager in overseeing the development of the ECA framework and planning process, revision of policies and guidelines, capacity building and for implementation of ECA management plans for pilot sites and its replication. He/she will also be responsible for the providing technical oversight for all project activities and the delivery of its outputs, under the direct guidance of the PD. Accordingly the budget notes and budget table has been revised. *(Please refer to TBWP of UNDP ProDoc, pp. 92-97).*

2. The project is charging the Stakeholder Engagement Plan and the Gender Plan to the M&E. These charges needs to be removed because these two items are presented as part of the CEO Endorsement.

This is well noted and removed from the M & E budget *(Please refer to Table 6 of UNDP ProDoc, pp. 82-84).*

3. What is "Mobile Laboratory for monitoring" for \$90,000 (Note 20).

This is an equipment that will be used for monitoring of the various parameters of soil and water in selected AEZs. The budgeted amount for this equipment is \$40k.

4. Please confirm that UNDP's role in this project will be limited to those as a GEF Agency as described in the GEF PMC Guidelines.

This comment is well noted and we have revised relevant paras in the prodoc (Please refer to para. *(Please refer to Section VII, p. 79 & Section VIII of UNDP ProDoc, pp. 84-87).*

In the Project Document, please remove ".....under UNDP's National Implementation Modality (NIM). Thanks.

This has been removed as suggested (*refer to para 121 of UNDP ProDoc, p. 51*).

UNDP Response, 19 February 2020

1) UNDP has been removed from “Other Executing Partner(s)” section

2) Audit cost has been removed from M&E Budget table. The cost of Audit is currently charged to PMC (Budget note #20)

3) The national technical coordinator will focus on supporting technical aspects of the project. S/he will also ensure the delivery of communication strategy, training programs and KM components. Some specific tasks of the National Technical Coordinator is provided below (ToR of the NTC is included in Annex 3 of the Prodoc).

(a) Assist in the preparation of operating guidelines for ECA planning and management and other responsible partners as part of work packages to operationalize key features of the project interventions at the corridor and cluster levels;

(b) Facilitate policy dialogue at national level to support preparation of targeted policy instruments particularly in relation to ECA governance mechanisms and strengthening roles and responsibilities of key players;

(c) Oversee and facilitate delivery of ecosystem-based framework for ECAs, its application to target sites, institutionalization within hierarchy of ECA Committees supported by legal reforms and sustainable financing for ECAs;

(d) Oversee development and delivery of ecosystem-based management plans and associated monitoring, action and financing plans for project sites; and mainstreaming across other ECAs;

(e) Oversee and guide the implementation of the gender strategy, the communication and KM plans, monitoring of RFA indicators and supporting the MTR and TE evaluations;

(f) Ensure technical alignment and monitor project progress and participate in the production of progress reports ensuring that they meet the necessary reporting requirements and standards.

4. Does the project take into account potential major risks, including the consequences of climate change, and describes sufficient risk response measures? (e.g., measures to enhance climate resilience)

Secretariat Comment at CEO Endorsement

6-4-19

Is the CC Risk (Climate change may adversely influence the potential outcomes of project interventions) really **MODERATE** especially considering the frequent floods in Bangladesh?

7-18-19

Cleared

Response to Secretariat comments

UNDP Response, 27 June 2019

This is now reflected as a “High” risk in the SESP and risk matrix of UNDP ProDoc ([pp.52-56](#)) and GEF CEO ER table 2 ([pp.15-19](#))

Refer UNDP Project Document Table 3 and Annex 4 SESP; and GEF CEO ER Table 2 ([pp.15-19](#))

5. Is co-financing confirmed and evidence provided?

Secretariat Comment at CEO Endorsement

6-4-19

The LoC from Government and UNDP are provided. Please clarify if the \$10 million co-financing from Government is in Cash or In-Kind and if the co-financing is for Technical Assistance or Investment Mobilized. Please clarify the geographic relationship between the target ECAs in this project and the "Sustainable Forest and Livelihood (SIJFAL) Project" where the \$10 million will be invested.

7-18-19

Cleared

Response to Secretariat comments

UNDP Response, 27 June 2019

The \$10 million is in the form of parallel financing from the World Bank funded Sustainable Forest and Livelihood (SUFAL) project (2018-2023) and is considered as “Grant” financing for both Technical Assistance and Investment.

The \$175 million World Bank SUFAL project is national in scope and intends to: (i) improve organizational effectiveness of national agencies by strengthening institutional capacity, information systems and staff training; (ii) strengthen collaborative protected area and forest management for forest restoration, wildlife protection, biodiversity conservation and ecosystem services; (iii) increase awareness for generation of alternative income generation activities and (iv) monitor restorative activities. The project will function in the two districts that the target ECAs are located, namely Chittagong and Jessore districts, but not physically within the two target ECAs.

However, the project has direct relevance to the activities of the GEF-6 project that would benefit immensely from capacity building, restorative activities and community related activities. Of particular relevance are management planning processes, ecosystem services evaluation, SMART community patrolling, IAS control mechanisms, development of village community livelihood programs and village community fund management, institutionalization of village sub-committees, wildlife restorative activities, ecotourism promotion, mangrove restoration, etc. all of which would be very beneficial as part of the learning and replication processes for the GEF ECA project.

The SUFAL project activities (listed above) that are directly relevant to the GEF project are conservatively costed at \$10 million from the total outlay of \$175 million for the project. Both the SUFAL and GEF ECA projects are located under the same ministry (MOEFCC), so specific arrangements would be instituted for sharing of lessons and experiences from both projects to enable cross fertilization of ideas, learning and best practices.

Refer Table 7 of UNDP Project Document ([p.89](#)) and Table B of GEF CEO ER.

6. Are relevant tracking tools completed?

Secretariat Comment at CEO Endorsement

6-4-19

No Tracking Tools needed. The Core Indicators are included.

Cleared

Response to Secretariat comments

7. Only for Non-Grant Instrument: Has a reflow calendar been presented?

Secretariat Comment at CEO Endorsement NA

Response to Secretariat comments

8. Is the project coordinated with other related initiatives and national/regional plans in the country or in the region?

Secretariat Comment at CEO Endorsement

6-4-19

Cleared

Response to Secretariat comments

9. Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat Comment at CEO Endorsement NA

Response to Secretariat comments

10. Does the project have descriptions of a knowledge management plan?

Secretariat Comment at CEO Endorsement

6-4-19

Knowledge management is included under Component 3.

Cleared

Response to Secretariat comments

Agency Responses

11. Has the Agency adequately responded to comments at the PIF stage from:

GEFSEC

Secretariat Comment at CEO Endorsement

6-2-19

No. Please see above the issues that need to be tackled in the CEO Endorsement.

Response to Secretariat comments

STAP

Secretariat Comment at CEO Endorsement

6-4-19

Yes

Cleared

Response to Secretariat comments

GEF Council

Secretariat Comment at CEO Endorsement

6-4-19

Yes

Cleared

Response to Secretariat comments

Convention Secretariat

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

Recommendation

12. Is CEO endorsement recommended?

Secretariat Comment at CEO Endorsement

6-4-19

No. Please address outstanding issues.

7-29-19

No. This CEO Endorsement is not recommended for clearance.

Please remove Paragraph on Page 89 of the CEO Endorsement (211. UNDP Direct Project Services as requested by Government) and confirmed that UNDP will limit their role to the IA role as described in the GEF PCM guidelines.

11-18-19

Please address issues under item 3. Thanks.

1-6-20

Yes. This CEO Endorsement is recommended.

AFTER INITIAL TECHNICAL CLEARANCE

2-7-20

Please address outstanding budget issues Listed in Window 3. Thanks

2-21-20

No. Please address outstanding issue Listed in Window 3. Thanks

3-5-20

This CEO Endorsement is recommended

Response to Secretariat comments

UNDP Response, 18 October 2019

The para (211) on UNDP direct project services has been removed and the budget has been re-distributed within the components (*please refer to TBWP of UNDP ProDoc. Pp. 91-95*)

UNDP Response, 19 Feb 2020:

Outstanding issues are addressed above in #3.

Review Dates

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
First Review		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		

Secretariat Comment at CEO Endorsement**Response to Secretariat comments****Additional Review (as necessary)****CEO Recommendation****Brief Reasoning for CEO Recommendations**

CONTEXT: Bangladesh is the world's eighth most populous country, estimated at 165 million in 2017, and three times more densely populated than neighboring India. Associated with this scenario of a high-density population are huge dependencies by rural communities on natural resources for their livelihoods. This results in widespread degradation of ecosystems through changes in land use and hydrological regimes (including saline intrusion), over-exploitation and pollution of aquatic, terrestrial, coastal and marine habitats, and invasion by alien species, all of which may be accompanied by a loss of native species diversity. More impetus to conserve the natural environment, improve environmental standards and control and mitigate environmental pollution was introduced with the passage of the Bangladesh Environment Conservation Act in 1995, enabling Department of Environment to declare Ecologically Critical Areas (ECAs) in cases of sites being under significant threat of degradation from over-exploitation, pollution and other factors. The long-term solution sought by the project is to further strengthen Ecologically Critical Areas (ECAs) and develop an ecosystem-based framework to underpin their management, ensuring that it is adequately institutionalized and resourced through sustainable financing mechanisms. This should result in enhancing the conservation of globally significant biodiversity and support local livelihoods.

PROJECT: The project has the following components and outcomes: Component 1: Designing a financially viable, ecosystem-based management framework/system for Ecologically Critical Areas (ECAs). Outcome 1: Ecosystem-based framework application to the planning and management of ECAs institutionalized. Component 2: Applying a participatory ecosystem-based framework to effectively plan, manage, finance and monitor compliance in target ECAs. Outcome 2: Improved ecological condition of target sites (Halda River and Morjat Baor) through effective community engagement and benefit sharing arrangements. Component 3: Strengthening the institutional, technical capacity, knowledge management, gender mainstreaming and M&E to maintain the integrity of ECAs. Outcome 3: Institutional capacity, knowledge management, gender mainstreaming and monitoring and evaluation contributes to identification of improved tools, approaches and best practices for replication and scaling up.

INNOVATION: Innovation will be focused on strengthening the governance and financial viability of the ECA system, which will benefit all ECAs, in addition to those targeted by the project to demonstrate the application of such strengthening measures.

SUSTAINABILITY: The ECA approach is proving successful in Bangladesh and a significant part of that success is due to the former UNDP-GEF project that was instrumental in designing and piloting the governance, planning and administrative infrastructure for an initial tranche of four ECAs. However, 20 years on and the 13 existing ECAs continue to remain dependent on project funding. Hence, financial sustainability continues to be an issue. The other major concern is the ever-increasing threats faced by ECAs and poor enforcement of the law, exacerbated by the inability to apply the "polluter pays" principle. This project is designed to address these short-comings, both of which need to be tackled at the institutional level within the Department of Environment, the authority responsible for ECAs – hence the "strong Top-Down design". The paradigm shift from project-dependency to sustainable financing of the ECA network will be the subject of a Strategy that will include financial incentives and disincentives (e.g. "polluter pays"), as well as examine opportunities for co-management or sustainable management with communities and NGOs, partnerships with other agencies and the private sector, ecosystem services and other financing mechanisms.

SCALE-UP: The governance, capacity, training, management, monitoring and financial strengthening of the ECA system achieved and demonstrated in 2 pilot sites during the lifetime of this proposed project, including the adoption of standards, protocols and tools, will benefit other ECAs (13 in total in Bangladesh) during and subsequent to project implementation.

CO-FINANCING: Ministry of Environment, Forest and Climate Change and UNDP.