The Digital Seafood Revolution: Electronic catch documentation and traceability systems (eCDT) for sustainable and legal fisheries in Chile, Peru, and Ecuador

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID
11674
Countries
Regional (Chile, Ecuador, Peru)
Project Name
The Digital Seafood Revolution: Electronic catch documentation and traceability systems (eCDT) for sustainable and legal fisheries in Chile, Peru, and Ecuador
Agencies
UNEP
Date received by PM
12/19/2025
Review completed by PM

Program Manager
Andrew Hume
Focal Area
International Waters
Project Type
FSP

PIF

CEO

Part I - General Project Information

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

Secretariat comment at CEO Endorsement Request
2/2/2026

Yes.

Agency Response

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

Secretariat comment at CEO Endorsement Request
2/2/2026

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?

Secretariat comment at CEO Endorsement Request
2/2/2026

Yes.

Agency Response

3. Project Description Overview
a) Is the project objective statement concise, clear and measurable?
b) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?
c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
e) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request
2/2/2026

Partly. Overall the project seems to have scaled back its ambition from the approved PIF and has weaker alignment with the IW Focal Area. Specific project design comments are in below review questions. Please address the following
On co-financing, the co-financing match for all GEF funded lines are all a ratio of 1: 14.54, an odd coincidence or a suggestion that no real effort was made to match co-financing from each source to the specific actions proposed to be GEF funded, including M&E and PMC. Please revisit the cofinancing to ensure it respects the principles of incremental cost reasoning.

5/5/2026:

Addressed and thank you for the response.

Agency Response

Agency response - April 2026

Project ambitions and alignment with the GEFIW focal area

Overall, please rest assured that the ambitions of the project were not scaled back from PIF stage. Throughout PPG, the ambitions were reviewed and aligned with existing initiatives both nationally and regionally. Some of the resulting strengthening of activities or refinement might not have come across clearly. This has now been reviewed and adjusted accordingly throughout the CEO ER.

In this context, please specifically note the following.

During the transition from PIF to CEO Endorsement, the project design was revised based on additional analysis conducted during the PPG phase. This analysis confirmed that CPPS adopted a Regional Action Plan to Combat IUU Fishing in 2020, which provides a formal regional framework for cooperation. As explained in Section 2(ii), although this framework is in place, the terms of its operationalisation are not yet defined and this project will assist in finessing the implementation mechanisms .

At the PIF stage, Output 2.1.3 proposed establishing a tri-national cooperation agreement to support the effective implementation of eCDT systems and improved MCS. Following confirmation that the CPPS Regional Action Plan already exists, the project design was adjusted to avoid duplicating an agreement that is already formally in place. Revised Output 2.1.2 now focuses on strengthening the Scientific and Technical Committee under the Regional Action Plan to support effective implementation and coordinated regional actions against IUU fishing. The wording in the Results Framework and Project Description have been clarified to explicitly reference the CPPS institutional structure.

The substantive objective remains unchanged. The project continues to pursue coordinated regional implementation of eCDT systems and strengthened MCS to address IUU fishing. The project maintains its original ambition while refining the operational pathway. The focus shifts from negotiating a new agreement to strengthening the existing regional framework so that it can deliver coordinated and effective implementation.

co-financing distribution

The co-financing distribution has been revised to better reflect the alignment between partner contributions and the specific activities supported under each component. The updated version no longer applies uniform ratios across GEF-funded lines; instead, co?financing has been reassigned based on the specific activities and incremental logic of each project component, including M&E and PMC.

In addition, we have prepared a detailed co?financing budget document (see Excel co-financing matrix in the road section) that specifies the contribution of each source to every project component and to overall project management.

These adjustments ensure full consistency with GEF incremental cost reasoning.

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

Secretariat comment at CEO Endorsement Request
2/2/2026

Mostly. However, as presented, it is unclear what real comparative advantage UNEP brings to this project as there is no mention of UNEP's actual added value in the project summary or baseline efforts beyond a general paragraph of global initiatives that lack any tangible connection to the project or the region. Similarily, why is UNEP not providing any cofinancing to the project?

5/5/2026:

Addressed

Agency Response
Agency response - 27 April 2026

The CEO ER has been revised to clarify UNEP?s comparative advantage as the GEF Implementing Agency. Building on the PIF inputs, additional text has been included in the Project Summary and Project Rationale sections to highlight UNEP?s role in facilitating global and regional cooperation, ensuring alignment with the GEF International Waters framework, and supporting knowledge exchange through relevant global initiatives related to sustainable fisheries governance and seafood traceability. The narrative describing UNEP?s global initiatives has also been strengthened to clarify their direct relevance to the project, particularly in relation to transparency in seafood supply chains and the development of electronic catch documentation and traceability systems (eCDT).

Regarding co-financing, the indicative direct contribution (USD 300k) at PIF stage was mostly meant to come from UNEP FI based on preliminary expectations regarding the availability of programmatic resources through the secretariat itself. As you are aware the UN system is facing austerity and UNEP is no exception. Subsequent changes in funding availability within UNEP WCMC and UNEP FI Secretariat including reductions in certain external financial contributions, have limited the possibility of confirming UNEP FI Secretariat and UNEP- WCMC co-financing contributions at this stage. Nevertheless, as reflected in the co-financing letter, UNEP FI?s cofinancing comes mostly from its partner FAIRR now contributing roughly 10M of in-kind, grant and equity funding to the project. UNEP continues to support the project both from a programmatic baseline standpoint, but also through its role as GEF Implementing Agency by providing technical oversight, policy guidance, safeguards compliance, and knowledge

management support, as well as facilitating regional coordination and linkages with relevant global initiatives. In that context, UNEP as GEF Implementing Agency will continue engagement with UNEP FI Secretariat to secure their support including thru co-financing contributions and will be exploring opportunities to mobilize complementary resources through its partnerships during project implementation.

5 B. Project Description
5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?
b) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?
c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?
d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?
f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?
g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?
h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?
i) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?
j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?
k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?
l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request
2/2/2026

1) Please explain why has the ambition of Component 2 been lowered, namely the removal of PIF approved activities related to a regional agreement and other activities on promoting regional data sharing? Multi-country/regional cooperation is the main objective of the International Waters Focal Area and weakened approaches towards this goal suggest poorer project alignment with GEF IW funding.

2) It is unclear from the project description what regional entities will be engaged to strengthen regional coordination. For example, Activity 2.1.1.1 mentions the project will "Provide operational support to the Secretariat..." but it is unclear what secretariat this is referring to. Likewise, there are mentions to modernize regional cooperation (Output 2.1.1) - what existing regional cooperation is being modernized? Additionally, it is unclear how relevant existing regional bodies, like IATTC or CPPS, are engaged in project execution (as noted later in this review, neither IATTC or CPPS are providing cofinancing). The project description needs to do a much better job explaining how it is working with and through relevant existing regional coordination efforts to ensure national and regional capacities are strengthened.

3) The ambition of Component 3 also seems to be lower. The focus now seems to be on developing training modules, with no explicit plan for implementing the modules (the text only says develop and not implement, see Outputs 3.1.2 and 3.1.3). How will these modules be implemented? What about the PIF-approved goal of training 10,000+ stakeholders?

4) The project fails to have a dedicated output for engagement in IW:LEARN (as was the case in the approved PIF). This is especially worrisome coming from UNEP since UNEP is a co-implementing the current phase of IW:LEARN. Please revise accordingly.

5) While the issue of strengthening enforcement capacity to address IUU was flagged at PIF, there do not appear to be meaningful efforts to target this element beyond some learning exchanges in Output 2.1.3. What is the logic for not having more targeted interventions with enforcement entities at the national and regional levels?

6) It is noted that efforts to implement PSMA are only being conducted in Ecuador. As Chile and Peru are also members of PSMA, what is the logic to support PSMA implementation in all participating countries?

7) The connection to international markets is not convincing. How are the updated regulations in Output 1.1.5 connected to the traceability pilots (Output 3.1.4)? It is not clear if the pilots will test/prove the assumption that change in regulation alone will result in new international market access. What international market actors are participating in the project (especially international seafood corporations) that can facilitate this?

5/5/2026:

Addressed.

Agency Response

Agency response -27 April 2026

1) The ambition of Component 2 has not been reduced, rather, the operational pathway has been refined based on additional institutional analysis carried out during the PPG phase. At PIF stage, the project envisaged: (i) the development of a regional approach for accessing and sharing eCDT data, and (ii) the establishment of a tri-national cooperation agreement to formalize regional coordination for eCDT implementation and MCS.

During the PPG, it was confirmed that CPPS had already adopted a Regional Action Plan against IUU fishing. This plan provides a formal intergovernmental and political framework for regional cooperation. Considering this, the project design was adjusted to avoid duplicating an agreement that is already in place.

The focus shifts to strengthening the existing framework by improving its implementation mechanisms and reinforcing structured coordination. As described in the Project Description under Component 2, the functions originally envisaged at PIF stage are preserved through both the technical and political dimensions of existing regional cooperation. The regional data-sharing and interoperability function is now operationalized through Output 2.1.1, which strengthens Red Pesca INDNR as a structured technical platform for information exchange, digital interoperability, and joint data verification among Ecuador, Peru, and Chile. The formal regional coordination function is now delivered through Output 2.1.2, which strengthens the implementation framework of the CPPS Regional Action Plan and its Scientific and Technical Committee as the

intergovernmental mechanism for structured coordination, follow-up, and joint action against IUU fishing.

Together, these outputs maintain the technical and political dimensions of regional cooperation approved at PIF stage, while shifting the project from the creation of new frameworks toward the strengthening and operationalization of existing ones. They consolidate an operational regional framework capable of delivering coordinated implementation of eCDT systems, enhanced MCS cooperation, and measurable regional impact against IUU fishing. This preserves the project?s regional ambition and reinforces its alignment with the International Waters focal area.

2) The project description has been revised to clarify which regional entities are engaged and how the project works through existing coordination mechanisms to strengthen national and regional capacities.

Section 3 Key stakeholders (Regional Bodies) now distinguish the role of each relevant body. CPPS is presented as the primary intergovernmental platform for political coordination among Peru, Chile, Ecuador, and Colombia. The project supports the operational strengthening of the CPPS Secretariat to facilitate regional follow-up, coordination of national measures, and implementation of the CPPS Regional Action Plan to Combat IUU Fishing.

Red Pesca INDNR is identified as the technical cooperation platform through which the project supports structured information exchange, interoperability, operational dialogue, and joint verification among participating countries., with FAO support. . In practice, CPPS provides the political coordination space, while Red Pesca INDNR supports technical and operational cooperation among participating States.

Output 2.1.1 clarifies that the project strengthens and updates existing cooperation mechanisms under the CPPS framework. This includes improving interoperability, enhancing structured information exchange, supporting coordinated enforcement follow-up, and integrating tools such as eCDT systems within current regional arrangements. The project builds on established institutional structures and reinforces their effectiveness.

The description also clarifies the relationship with IATTC and SPRFMO. These organizations remain important global mechanisms for conservation and management of shared stocks. The project is designed to align with their standards and processes, particularly in areas such electronic monitoring.

3) We appreciate the observation regarding the ambition of Component 3. However, we would like to clarify that the level of ambition has not been lowered. The target of training more than 10,000 stakeholders remains a formal commitment in the Results Framework and it has also been updated to be included in the project description narrative. The component is organized around a clear sequence of strategy, development, implementation, and scaling to ensure sustainability and long-term continuity.

The component follows a clear sequence of engagement, delivery, and sustainability. Output 3.1.1, develops the engagement strategy and identifies the economic, regulatory, and market incentives needed to encourage participation and reduce resistance to digital tools. This step creates the enabling conditions for effective uptake.

Output 3.1.2 title has been updated to include ?implementation? after training modules are developed. In that sense, this output covers the design, piloting, and implementation of training modules at basic, advanced, and train-the-trainers levels. Pilot training sessions (activity 3.1.2.3) apply these modules in prioritized fisheries across the three countries with the different approaches and based on the engagement strategy from the prior output.

Output 3.1.3 focuses on institutionalization of the training modules within government structures to ensure long-term sustainability beyond the project period and supports sustained impact over time. It is expected that validated training modules are integrated into the national training systems of Ecuador, Peru, and Chile.

4) We appreciate the comment regarding the visibility of IW:LEARN engagement within the project design. In the first CEO ER submission, IW:LEARN participation was fully incorporated under Activity 3.1.4.6, ?Systematize and share pilot lessons through learning exchanges and knowledge products, including dedicated spaces for women and youth, and disseminate findings through the project platform and IW:LEARN.? It was therefore conceptually integrated, although placed at the activity level to streamline the results framework.

However, in response to the reviewer?s concern and to fully align the project with GEF International Waters requirements and the approved PIF, the revised CEO ER reinstates IW:LEARN participation as an independent output under Component 3. The new Output 3.1.5, titled ?Project results, including gender?responsive knowledge products, disseminated through IW:LEARN to support global learning and replication,? ensures clear, dedicated space for IW:LEARN engagement. This revision restores full consistency with the PIF, strengthens transparency, and demonstrates the project?s commitment to active participation in IW:LEARN.

5) Since the PIF stage, the project design has been refined to ensure that its deliverables directly support IUU enforcement. At the national level, Component 1 identifies and implements practical financing and institutional measures to strengthen enforcement capacity for each countries? responsible agency (SRP ? Ecuador, PRODUCE- Peru, and SERNAPESCA ? Chile. This is complemented by the technical strengthening of official eCDT systems in the three countries. These systems are integrated into routine MCS operations and tested through field pilots to ensure they generate reliable data for inspections, compliance verification, and sanctions.

At the regional level, Component 2 focuses on operational cooperation. Starting in year two, the project will support at least three joint actions between countries on an annual basis, complemented by regional exchange events and MCS internship programs to get hands-on experience. These activities establish structured mechanisms for regional coordination and operational alignment among enforcement authorities. Joint actions can include: protocols, agreements, joint operations (e.g. GALAPEX), information exchanges, data validation, among others.

Overall, the project strengthens enforcement by building institutional capacity, improving operational procedures, and deploying interoperable digital systems. By aligning institutional, operational, and technological elements, it reinforces a coordinated enforcement framework capable of addressing IUU fishing in a sustained and practical manner. Edits have been made throughout the document, mainly in Component 2, to highlight how enforcement is strengthened.

6) As described in Section 2 (ii), all three countries are Parties to the PSMA. However, as mentioned in Output 1.1.1, their operational contexts and needs differ.

In Ecuador, previous analysis from authorities have already pointed towards specific needs, as PSMA inspections are already automated under SIAP. However, the remaining gap lies in automating and ensuring interoperability of the port arrival and entry authorization process with other competent institutions. This is particularly relevant given the regular arrival and unloading of foreign vessels in Ecuadorian ports, especially from the tuna fleet. The project therefore focuses on completing this module to ensure a fully integrated digital PSMA process. This has been added as an explanation in Activity 1.1.1.3.I

In Peru and Chile, foreign vessels do not regularly enter ports for unloading in the same way. As a result, this specific interoperability gap is not present in their current operational context. However, national diagnostics under Component 1 may identify additional measures to further strengthen PSMA implementation, which can be incorporated into work planning as appropriate. Under Component 2, Peru and Chile will also participate in technical missions and structured exchanges, including practical learning from Ecuador?s experience with digital PSMA integration. This supports peer learning and strengthens regional coordination.

It is important to highlight that the proposed activities follow a needs-based approach. Interventions are designed according to gaps identified through national diagnostics and baseline assessments. For example, CITES-related measures are included for Peru and Ecuador because existing analyses indicate this as a priority area in both countries. This ensures that project actions respond to clearly identified needs while maintaining overall regional coherence.

7) It is important to clarify that the objective of the project is not to open new international markets, but rather to maintain and secure continued access to existing markets for countries such as Chile, Ecuador, and Peru, whose fisheries sectors are highly dependent on exports.

The regulatory updates under Output 1.1.5 aim to ensure that these countries continue to comply with international requirements necessary to export to key destination markets. For example, exporting to Spain and other European Union countries requires catch certificates that specify fishing zones at the level of individual sets (hauls). Without properly implemented regulatory frameworks and robust traceability systems to support this information, access to these markets could be jeopardized.

In this context, the traceability pilots under Output 3.1.4 are not based on the assumption that regulatory reform alone will create new market opportunities. Rather, they are designed to operationalize and validate compliance with existing international requirements. The pilots will demonstrate that required data ? such as specific fishing areas, batch-level traceability, and chain-of-custody documentation ? can be effectively recorded, verified, and reported in line with international standards.

Furthermore, advancing toward internationally recognized certifications, such as Marine Stewardship Council (MSC) certification, is a key mechanism for maintaining and strengthening market presence in destinations such as the United States, the United Kingdom, and the European Union, where buyers increasingly demand verifiable sustainability credentials. WWF US?s participation in this project will be one way both certifiers and international seafood buyers incentivize the regulatory changes and uptake in the three countries. For example, WWF US plans to encourage its corporate partner seafood buyers to further encourage their suppliers from this region to participate in and benefit from the pilots (and other activities).

Therefore, the project seeks to safeguard the competitiveness and continued market access of Chile, Ecuador, and Peru, reducing the risk of trade exclusion as international regulatory and sustainability requirements.

Additionally, the FAIRR Initiative plays a key role as a private-sector mobilizer within the project. In partnership with World Wildlife Fund, Planet Tracker, the World Benchmarking Alliance, and the UNEP Finance Initiative, it channels investment from global seafood companies operating in Chile, Peru, and Ecuador.

Through its Seafood Traceability Engagement, FAIRR helps finance the development and scaling of digital traceability systems, including eCDT solutions, and supports their interoperability in line with GDST standards. It also contributes in-kind support from companies, as well as grant co-financing and technical advisory services, strengthening both system implementation and regional coordination.

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project
a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?
b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?
c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).

Secretariat comment at CEO Endorsement Request

2/2/2026

1) Execution - Please explain why no existing relevant regional entities have a role in project execution? Please be more explicit which WWF office will execute the project. Will it be WWF-US or WWF Peru (or other WWF offices in the region)?

2) Please state where the PMU will be physically based. Please describe all the staff that will be part of the PMU, including any proposed staff that will have part-time roles in the PMU but are allocated a portion of PMC (it is noted this is included as an annex but it should be more explicit in the main text). Lastly, please explain why the finance staff not part of the PMU?

3) Please explain in more detail the proposed role the national execution units presented in Figure 4. How are these managed by the PMU and engaged with the other project governance structures? How are efforts being made to keep personnel costs low?

4) Regarding coordination with other efforts, the information provided is severely lacking. Please explain why coordination with key other GEF funded projects noted at PIF, namely the Humboldt II and ETP projects are still not well defined at this stage? It was expected this would be accomplished during PPG since these projects are now underway. Close coordination with these efforts is critical and further detail must be provided before CEO Endorsement. Additionally on coordination with other GEF projects, please also engage and identify coordination opportunities with the recently approved global IUU project (GEF ID 11996) before resubmitting.

5/5/2026:

Partly addressed. However, please confirm in this section that the Agency will not hold voting rights in the PSC, per the interim CEO?s letter to Agency coordinators on 19 March 2026. Please amend project documents, as necessary.

5/29/2026

Addressed

Agency Response

Agency response - 27 April 2026

1) The project will be executed by WWF Peru, which will host the Project Coordination Unit (PCU) and be responsible for overall project management, fiduciary compliance, reporting, and coordination with UNEP as the GEF Implementing Agency. WWF Ecuador and WWF Chile will support national level implementation under the coordination of WWF Peru. WWF?US will

provide technical oversight, fiduciary support as needed and ensure alignment with global traceability standards and cross?country learning processes, working in a complementary role to the execution led by WWF Peru. Regional organizations such as the Permanent Commission for the South Pacific (CPPS) will contribute through regional coordination mechanisms and technical dialogue under Component 2. However, execution responsibilities remain with WWF to ensure unified fiduciary management and operational coordination across the three participating countries. During project preparation, we engaged relevant regional actors through informal exchanges with CPPS and IATTC, to ensure alignment with existing regional fisheries governance processes and traceability initiatives. We also held discussions with global technical partners such as GDST and GIZ to ensure alignment with ongoing regional and international traceability initiatives. Additionally, we coordinated with regional NGOs and their offices in Peru, Chile, Ecuador, and the United States, from which we obtained formal co?financing commitment letters. These actions reflect the project?s active engagement with regional stakeholders and the integration of their roles within the project?s regional cooperation framework, while maintaining clear execution responsibilities within WWF under UNEP oversight.

2) The CEO ER has been revised to clarify the structure and location of the Project Coordination Unit (PCU). The document now states that the PCU will be hosted by WWF Peru and physically based in Lima. The main text also explicitly lists the PCU staff, including the Regional Project Coordinator, technical specialists, administrative staff, and part-time roles supporting monitoring and evaluation, gender safeguards, policy, communications, and knowledge management.

Administrative staff within the PCU will support operational financial and procurement coordination, including budget tracking, documentation, and liaison with WWF?s institutional finance and procurement teams. Formal financial management, accounting, and contracting functions will remain under WWF?s institutional finance systems to ensure centralized fiduciary oversight and compliance with UNEP-GEF requirements.

3) For clarity, ?national execution units? referred to in the comment correspond to the National Coordination Units (NCUs) described in the project document.

As shown in Figure 4, the National Coordination Units (NCUs) are the national-level execution and coordination mechanisms of the project. Each NCU is led by the national fisheries authority, ensuring government ownership and alignment with national fisheries management frameworks, with technical and operational support from WWF country offices.

NCUs are responsible for coordinating project implementation at the national level, engaging stakeholders, and providing logistical and administrative support. They operate under the overall coordination of the Project Coordination Unit (PCU), which consolidates inputs from all countries, ensures alignment with regional objectives and approved work plans, and facilitates communication with the Project Steering Committee (PSC).

Technical guidance is provided by the Regional Technical Advisory Committee (RTAC), supporting harmonization of standards, interoperability, and regional knowledge exchange. NCUs are designed as lean coordination units embedded within existing national institutions, ensuring efficient execution and strong regional coherence.
Efforts to keep personnel costs low are embedded in the project design. While a limited number of full-time positions are maintained for critical coordination and accountability functions, personnel costs are controlled through a lean staffing structure. NCUs are embedded within existing national fisheries institutions, avoiding parallel structures, while key cross-cutting functions?such as coordination, monitoring and evaluation, fiduciary oversight, and reporting?are centralized in a small PCU. Clear role definitions, selective use of part-time roles and short-term consultancies, standardized procedures, and digital coordination tools further ensure cost efficiency.

4) The information on coordination with other GEF-funded initiatives was initially presented under Section 4, within the discussion on synergies and lessons learned. To improve clarity and alignment with the project design narrative, this information has now been consolidated and

expanded under Section B.8. (Coordination with Ongoing Initiatives and Project) The revised text provides a clearer and more detailed description of coordination arrangements with key GEF initiatives.

In particular, it strengthens the articulation of linkages with Humboldt II (GEF ID 10452), explicitly referencing coordination through its Component 4 on traceability, as well as implementation synergies related to value-chain and traceability approaches. The revised section also elaborates on coordination with the global EM4IUU project (GEF ID 11996), clarifying how electronic monitoring efforts will be linked to national and regional electronic catch documentation and traceability systems.

In addition, coordination with Beyond 30x30 in the Eastern Tropical Pacific (ETP, GEF ID 11267) is now explicitly described. In this seascape, the project will complement regional marine governance efforts by contributing fisheries-specific traceability and information systems that support transboundary cooperation and coordinated responses to illegal, unreported, and unregulated (IUU) fishing. Together these revisions ensure that coordination with ongoing GEF investments is clearly defined and appropriately reflected prior to CEO Endorsement.

Agency response - 27 May 2026

We confirm that as reflected in the PSC Terms of Reference and Institutional Arrangements, UNEP, in its role as GEF Implementing Agency, will participate in an advisory and oversight capacity and will not have voting rights.

5.3 Core indicators
a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?
b) Are the project's targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) /adaptation benefits reasonable and achievable?
Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request
2/2/2026

Partly. It is noted that CI-11 has not changed at all since PIF. Please explain the process undertaken during PPG for evaluating these estimates of direct beneficiaries with stakeholders and comment on why the values presented CEO Endorsement remain exactly what was estimated at PIF.

5/5/2026:

Addressed

Agency Response
Agency response -27 April 2026

During the PPG phase, the project team validated the CI?11 estimates originally presented at PIF through consultations with national fisheries authorities, community organizations, and private?sector representatives. This process confirmed that the overall scale of direct beneficiaries

remains accurate for the project?s interventions. Therefore, the total CI?11 value remains unchanged from the PIF.

As part of this validation, the project refined its beneficiary estimates as follows:

- ? Fishing vessels and shipowners:
  A total of 10,200 people, including 3,200 shipowners and 7,000 crew members.
- ? Public officials:
  300 officials involved in fisheries management across the three countries.
- ? Workers in private companies:
  225 workers from approximately 45 companies in the fishing sector.
-

Total direct beneficiaries (CI?11): 10,725 people is consistent with the PIF.

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
2/2/2026

Partly. Overall, the proposed mitigation measures for nearly all risk categories are generic and poorly presented. Please review and revised all with more careful detail to how the specifics of this project and its interventions will mitigate the identified risks. For example, the Climate Risk rating, given how sensitive the Humboldt Current is to climate change, the proposed mitigation seems weak and unconvincing to manage this high risk. Please state more specifically what management mechanisms would be used by the project to inform adaptive management of the targeted fisheries as a result of increased transparency.

5/5/2026:

Addressed

Agency Response
Agency response - 27 April 2026

In response, the risk section has been revised to include clearer and more project?specific mitigation measures across all relevant categories. Each risk is now linked to concrete mitigation actions derived from the project?s interventions, including the implementation of eCDT systems, institutional coordination mechanisms, and targeted capacity-building activities. In particular, the mitigation measures for climate risk have been strengthened to reflect the sensitivity of the Humboldt Current ecosystem and to clarify how improved traceability systems will generate reliable data on fishing effort, catch composition, and spatial distribution. The revised text explains how this information will be used by fisheries authorities to support adaptive management,

including adjustment of management measures and strengthening of monitoring, control, and surveillance (MCS).

These updates strengthen the alignment between risks, mitigation measures, and the project?s expected contribution to transparency, evidence based decision?making, and adaptive fisheries management.

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 RequestN/A

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?

Secretariat comment at CEO Endorsement Request
2/2/2026

No. As noted above, the weakened ambition from the approved PIF (namely Components 2 and 3) results in a poorer alignment with the IW Focal Area. The project design requires strengthening to better make the case for a regional investment.

5/5/2026:

Addressed

Agency Response
Agency response - 27 April 2026

This comment has been addressed in the revised project design. The updated description of Components 2 and 3 clarifies that the regional ambition approved at PIF stage has been maintained, while refining the operational approach based on additional institutional analysis conducted during the PPG phase.

The revised text now explains more clearly that Component 2 strengthens shared regional mechanisms under CPPS and Red Pesca INDNR, supporting structured technical exchange, interoperability, and coordinated action against IUU fishing among Chile, Peru, and Ecuador. This reinforces alignment with the International Waters focal area by emphasizing transboundary cooperation and regional governance. Component 3 has also been strengthened to better reflect the project?s regional value-added through common training approaches, regional learning exchanges, and the dedicated IW:LEARN output, which support replication and more consistent implementation across countries. Together, these revisions better position the project as a regional investment under the International Waters focal area.

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

Secretariat comment at CEO Endorsement Request
2/2/2026

Partly. As noted in comment above on coordination with key other projects, the lack of clear coordination with Humboldt Current Phase II and ETP projects and the government supported efforts behind that these projects highlights stronger alignment with regional priorities is needed. Please revise the project accordingly.

5/5/2026:

Addressed

Agency Response
Agency response - 27 April 2026

This comment has also been addressed through revisions that further clarify both coordination and alignment with related regional initiatives and policy frameworks. The updated CEO ER now clarifies how the project coordinates with Humboldt II (GEF ID 10452), the Eastern Tropical Pacific Project Beyond 30x30 (GEF ID 11267), and the recently approved EM4IUU project (GEF ID 11996), including complementarity on traceability, marine governance, electronic monitoring, and value-chain approaches.

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
2/2/2026

Yes.

Agency Response
7 D. Policy Requirements
7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request
2/2/2026

Yes.

Agency Response
7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request
2/2/2026

Yes a gender action plan was uploaded. However, please increase the target beneficiary women-men ratio closer to parity. It currently stands at 20%, which is very low and not consistent with GEF project beneficiary distribution that is closer to parity.

5/5/2026:

Addressed

Agency Response

Agency response - 27 April 2026

A similar observation was raised during the PIF stage. At that time, the project acknowledged that the fisheries sector targeted by the intervention is structurally male?dominated, which limits the absolute number of women directly involved in fishing operations. Nevertheless, during the PPG process and through the development of the Gender Action Plan (GAP), the team identified concrete entry points to strengthen women?s participation across all components.

As a result, the project updated the gender distribution of its direct beneficiaries under Core Indicator 11, increasing the participation of women from the original estimate to at least 35%, which represents a realistic and evidence?based projection within the current sectoral context. The GAP also includes a set of targeted activities designed to ensure a minimum of 35% women?s participation in capacity?building processes, governance spaces, and value?chain strengthening activities.

While parity remains challenging due to structural barriers and the limited number of women directly engaged in fisheries operations, the revised approach substantially improves gender inclusion without altering the total number of expected beneficiaries. The project will continue to monitor opportunities to further increase women?s participation during implementation, in coordination with national partners.

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

2/2/2026

Yes a stakeholder engagement plan was uploaded. However, please note the following:

1) As noted elsewhere in the comments, it remains unclear how key regional entities were engaged in the project's design for CEO Endorsement. The 268 page (and mostly in Spanish) stakeholder record (Appendix 10) suggests no bilateral meetings were held with any regional entities. Please clarify and revise accordingly.

2) The project states that it will be implemented through direct involvement of local stakeholders and institutions. However, the role of local communities, fishers and other relevant local associations and groups are not described in the project or the annexed Stakeholder Engagement Plan (annex 3c. SEP). Please further elaborate on their role related to project components and outcomes. In addition, please ask agency to elaborate further in the SEP on the strategy for engaging the stakeholder beyond just stating involve, consult or collaborate.

5/5/2026:

Addressed

Agency Response

Agency response - 27 April 2026

1) During the PPG and design phase, the project team engaged relevant regional and international entities through technical exchanges and coordination discussions, including the Permanent Commission for the South Pacific (CPPS), the Global Dialogue on Seafood Traceability (GDST), and GIZ. These engagements took place through a combination of informal meetings, technical discussions, and more informal coordination exchanges, reflecting the nature of ongoing collaboration with these entities.

However, not all of these interactions were systematically recorded as bilateral regional meetings in Appendix 10, as the stakeholder record focused primarily on documenting national-level consultation processes.

Despite this, the inputs and guidance from these regional organizations are reflected in the project design narrative, particularly in sections related to regional coordination, traceability standards, interoperability, and alignment with international initiatives. In addition, collaboration with these entities is also evidenced in the co-financing and counterpart contributions described in the document, which reflect existing partnerships and technical cooperation arrangements established during project preparation.

2) The Project is designed to ensure the active involvement of local stakeholders and institutions through private initiatives that integrate second-level organizations. These umbrella organizations act as intermediaries, aggregating various grassroots associations and fishers-based organizations. Their role has now been clarified more explicitly in relation to project components and outcomes. In particular, these actors will contribute to Component 1 through participatory diagnostics and validation of needs related to traceability and interoperability, and to Component 3 through participation in pilots, training, testing of digital tools, and uptake of traceability practices in priority fisheries.

In the SEP, Table 2 (Project Stakeholder Typology) classifies these Private Initiatives as direct beneficiaries and includes local and national second-level fisheries organizations that consolidate grassroots fishers. As example, FENACOPEC represents 400 artisanal fishing associations and various grassroots sectors within the Ecuadorian fishing industry. Engaging them through the umbrella organizations ensures a structured and effective mechanism for grassroots participation.

In the SEP, The Table 4 (Proposed Engagement techniques and channels) has been updated as well to clarify that these private initiatives are built upon the foundation of grassroots associations, and they are the project direct beneficiaries. The Engagement Strategy has been refined to explain how they will be involved through appropriate techniques.

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request
2/2/2026

A UNEP Safeguard Risk Identification Form (SRIF) was uploaded. SRIF said that ?a targeted Social Assessment and an integrated Social Risk Management Plan? will be developed. Please elaborate further the budget and responsibility. Please provide the final Social Assessment and the integrated Social Risk Management Plan as a part of first PIR. Please also include a monitoring plan as part of this management plan.

5/5/2026:

Addressed

Agency Response

Agency response -27 April 2026

As indicated in the SRIF, the project will prepare a targeted Social Assessment and an integrated Social Risk Management Plan (SRMP) during the inception phase. The text under Safeguards now clarifies that WWF Peru, as the executing agency, will be responsible for commissioning and supervising this work and the SRMP, with technical support from WWF-US and coordination with national social safeguards focal points in Ecuador, Peru, and Chile.

The budget for this work is included under Component 1 (institutional strengthening) and Project Management Costs, covering consultancy services, stakeholder engagement, and field validation.

The final Social Assessment and the integrated SRMP?including a detailed monitoring plan for social risks and mitigation measures?will be submitted with the first PIR, as requested.

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

Secretariat comment at CEO Endorsement Request
2/2/2026

Yes.

Agency Response
Focal Area allocation?

Secretariat comment at CEO Endorsement Request
2/2/2026

Yes.

Agency Response
LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement RequestN/A

Agency Response
SCCF A (SIDS)?

Secretariat comment at CEO Endorsement RequestN/A

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

Secretariat comment at CEO Endorsement RequestN/A

Agency Response

Focal Area Set Aside?

Secretariat comment at CEO Endorsement RequestN/A

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 Request
2/2/2026

Yes

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 RequestN/A

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
2/2/2026

Partly.

1) While it is appreciated that the cofinancing has increased since PIF, many of the cofinancing partners listed in the cofinancing table are not listed anywhere in the project rationale or description, suggesting their cofinancing support is not considered part of the project baseline that the GEF incremental cost in building on. By way of example, the private sector entities EUROFISH S.A and Transmarina are identified in the cofinancing table but are not mentioned anywhere else in the CEO Endorsement document. What are these entities doing in this project to warrant their cofinancing? Their letter states support to Component 3 of the project, but refers to the PIF Component 3 title not the title presented at CEO Endorsement. This is not to question the legitimacy of their engagement but rather to use as an example of the disconnect the proposed project is presenting between GEF investment and the other identified project partners. Please revise accordingly.

2) Additionally, as noted above, the cofinancing ratio per all project lines is exactly the same, suggesting no effort was made to match cofinancing to project activities per incremental cost reasoning.

Please address the below initial comments noting that additional comments may be provided once the project is revised to reflect cofinancing participation aligned with GEF Incremental Cost Reasoning.

Initial Comments:

3) Where applicable, please submit an English translation of each cofinancing letter that is not in English and upload them into the cofinancing table

4) As noted earlier, please explain why UNEP is not providing any cofinancing to the project (UNEP was identified as a cofinancing partner at PIF)?

5) Please explain why WWF-Peru is not providing any cofinancing to the project?

6) With IATTC and CPPS noted as a key regional entities then why are they not engaged as a partner and providing cofinancing?

7) It is noted that none of the WWF cofinancing letters mention any support to project management even though the propose proposes $5,535,325 in PMC cofinancing. Where is this PMC cofinancing coming from and how was it calculated? This comment is also related to the proposed "Operating Costs" comment noted in the budget review question below.

Co-financing letters will be re-evaluated once project is ready for a full review.

5/5/2026:

Addressed

Agency Response

Agency response -27 April 2026

1) The revised CEO ER now addresses the issue of the cofinancing partners is described more clearly in the co-financing narrative, and in the project description. In particular, the section on ?Private Sector Investments Mobilized? explicitly explains the role of Ecuadorian private-sector partners such as EUROFISH S.A. and Transmarina C.A. Their contributions are described as baseline investments supporting tuna and longline value chains, including vessel access for electronic logbook pilots, technical staff time, digitalization of observer data, and alignment with existing Fisheries Improvement Projects (FIPs). The revised text also clarifies that these investments directly support the field testing, operational validation, and scaling of interoperable eCDT and electronic monitoring solutions under Component 3. This strengthens the connection between the co-financing table and the project baseline on which the GEF alternative builds. While some co-financing letters may still refer to the earlier PIF formulation of Component 3, the revised CEO ER clarifies the substantive continuity between those baseline contributions and the current Component 3 design.

2) The co-financing structure has been updated in accordance with the co-financing letters for each component (see Excel co-financing matrix in the road section). The CEO ER now specifies that co-financing contributions are aligned to specific components and outputs, rather than being proportionally distributed. Public-sector contributions are primarily associated with Component 1, while private-sector and partner investments are concentrated in Component 3, supporting pilot implementation and operational validation.

3) All co-financing letters have been reviewed and are now provided in English. Where letters were originally issued in other languages, corresponding English versions or translations have been prepared. All co-financing letters have been uploaded and linked to the co-financing table in accordance with GEF requirements.

4) UNEP was identified at PIF stage as an indicative co-financing partner (approximately USD 300,000), mainly linked to expected support from UNEP FI and UNEP-WCMC. During CEO preparation, changes in funding availability, including reductions in external contributions and broader UN system austerity measures, limited the possibility of confirming these contributions at the same level. Nevertheless, UNEP FI-related support remains reflected through its partner network, particularly FAIRR, which contributes significantly to the enabling environment for seafood traceability and market incentives. UNEP continues to support the project in its role as GEF Implementing Agency and will explore opportunities to mobilize additional resources during implementation.

5) A co-financing letter from WWF Peru has been attached, for the technical and administrative support of the project.

6) CPPS is considered the most appropriate regional counterpart for this project, as it brings together Chile, Peru, Ecuador, and Colombia, fully covering the project countries and the regional scope of intervention. During project preparation, the project team held a meeting with the Secretary General of CPPS, who expressed interest in collaborating with the project. This collaboration will focus on regional coordination, convening, and alignment of traceability and information-sharing efforts, and will be formalized through a letter of support to be included prior to CEO Endorsement.

IATTC remains a relevant regional actor, particularly for regional dialogue and information exchange. However, its membership includes only Ecuador and Peru, and the fisheries under its mandate are not among the priority fisheries targeted by this project. For this reason, IATTC has not been included as a formal project partner or co-financier. Nevertheless, the project will maintain appropriate coordination with IATTC during implementation to ensure complementarity and avoid duplication, as relevant.

7) The co-financing amount attributed to project management cost (PMC) is primarily derived from in-kind and financial contributions from WWF entities, including WWF US, WWF Chile, and WWF Per?, as well as other project partners like governments. These contributions consist mainly of staff time, technical oversight, administrative and coordination support, monitoring and evaluation functions, and including some Operating Costs required for effective project implementation.

While WWF co-financing letters do not explicitly categorize these contributions under PMC, they include the relevant support functions, which have been mapped to PMC based on their role in project delivery. The allocation and estimation of these contributions are reflected in the detailed co-financing matrix, ensuring consistency with GEF co-financing guidelines.

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 RequestN/A. LOEs provided at PIF

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 RequestN/A. LOEs provided at PIF

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 RequestN/A. LOEs provided at PIF

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?

Secretariat comment at CEO Endorsement Request
2/2/2026

Partly. The RF may be re-reviewed on resubmission after initial comments are addressed. Please note the following:

1) The project proponents should reconsider using output level indicators and keeping to only outcome level indicators as output level indicators are more appropriate for annual workplans where there is more flexibility to modifications that will encourage adaptive management.

2) Please increase the target beneficiary women-men ratio closer to parity. It currently stands at 20%, which is very low and not consistent with GEF project beneficiary distribution that is closer to parity.

5/5/2026:

Addressed

Agency Response
Agency response -27 April 2026

1) The submitted project document included output level indicators for implementation management at UNEP level. In line with the comment, the formal Results Framework has been revised to use outcome-level indicators, while output-level indicators will be retained for internal annual workplans and adaptive management.

2) The project has updated its beneficiary estimates to significantly increase the participation of women beyond the initial 20%. Based on the gender analysis and consultations conducted during the PPG phase, the project identified feasible entry points to strengthen women?s involvement across the value chain despite the male?dominated nature of the sector.
As a result, the project has **increased the target women?men beneficiary ratio to approximately 35%**, while maintaining the same total number of direct beneficiaries. This revised proportion reflects a realistic and evidence?based estimate of women?s engagement within the sector. The Gender Action Plan includes targeted measures to ensure that women are effectively reached and supported under all project components.

Although achieving parity is constrained by structural barriers in the fisheries sector, this updated ratio represents a substantial improvement and aligns with GEF expectations for enhanced gender inclusion whenever feasible.

Annex E: Project map and coordinates

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

Secretariat comment at CEO Endorsement Request

2/2/2026

Yes.

Agency Response

Annex G: GEF Budget template

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

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

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

Secretariat comment at CEO Endorsement Request

2/2/2026

Please address the following initial comments. Additional comments may be provided on resubmission based on revisions made.

1) Please refer to the updated Guidelines on the Project and Program Cycle Policy prepared for the 70th Council Meeting. We kindly request the agency to provide a line for the subtotal of each expenditure category in the budget.

2) A regional project coordinator + national technical support + admin staff are charged across components and the PMC. Per GEF Guidelines, the costs associated with the project?s execution have to be covered by the GEF portion and the co-financing portion allocated to PMC. When the situation merits, the project?s staff could be charged to the project?s components with ?clear Terms of Reference describing unique outputs linked to the respective component? (paragraph 4 ? page 42 of the Guidelines). These TORs should be included as an annex to the project document. Please also ensure that the TORs include a percent time allocation to project management and technical work.

2) Please state which WWF office (e.g. WWF US, WWF Peru, etc) is the responsible entity for each budget item.

3) Please incorporate all consultancies into the GEF budget template and not in a separate table. Please ensure each consultancy includes a short description.

4) Please explain/justify the "Operating Cost" budget line. Please explain how much co-financing is provided from WWF for this budget line to justify GEF support. Please further confirm this cost is for specific costs and not used for indirect cost recovery.

5/5/2026:

Partly addressed. Please clarify what types of consultants and staff are being hired. The project roles currently listed under ?Project Personnel,? ?Consultants w/m,? and ?Administrative Support,? should be re-categorized under the standard GEF Budget Expenditure Categories found in the Guidelines (p. 58): Individual Consultant (Local or International) or Salary and benefits / Staff costs. When resubmitted, we will review the budget again and may provide comments, if appropriate.

5/29/2026

Addressed

Agency Response

Agency response -27 April 2026

1) The budget template has been revised in line with the updated GEF Project and Program Cycle Policy Guidelines. Subtotal lines for each expenditure category have been included to improve transparency and facilitate review, ensuring full compliance with the updated requirements.

2) The Terms of Reference (TORs) for all key project staff have been updated as an annex to the project document (uploaded in the roadmap section). In response to the reviewer?s comment, the TORs have been updated to explicitly include indicative time allocations between project management (PMC) and technical functions linked to specific components and outputs. This way we ensure that personnel costs charged to project components are clearly justified based on their technical responsibilities, while coordination, reporting, and administrative functions are appropriately reflected under PMC, in line with GEF guidelines.

3) It has been updated in the budget

4) The ?Operating Cost? budget line includes only direct, project-specific operational expenses required to implement project activities. WWF provides co-financing to this budget line through in-kind and financial contributions that support these implementation-related operational needs, as reflected in the co-financing matrix. These Operating Costs are clearly distinct from Project Management Costs (PMC) and are solely intended to enable the effective delivery of project activities, in accordance with GEF and UNEP financial guidelines.

Agency response -27 May 2026

The comment has been addressed in the attached revised budget template. The budget lines previously presented under ?Project Personnel,? ?Consultants w/m,? and ?Administrative Support? have been reviewed and re-categorized in accordance with the standard GEF Budget Expenditure Categories outlined in the GEF Guidelines. The revised budget now clearly distinguishes between Salary and Benefits / Staff Costs and Individual Consultants (Local or International), depending on the nature of the role, contractual modality, and functions performed.

Annex H: NGI Relevant Annexes
8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.
b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.
c) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat comment at CEO Endorsement RequestN/A

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

2/2/2026

No. Please address the above comments and resubmit.

5/5/2026: Please address all comments and resubmit.

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

Secretariat comment at CEO Endorsement Request1) For SRIF, please provide the final Social Assessment and the integrated Social Risk Management Plan as a part of first PIR. Please also include a monitoring plan as part of this management plan.

9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	**2/2/2026**	
Additional Review (as necessary)	**5/13/2026**	
Additional Review (as necessary)	**5/29/2026**	
Additional Review (as necessary)		
Additional Review (as necessary)		