

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

**Review PIF 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 9/12/2024 Review completed by PM 10/16/2024 Program Manager Andrew Hume Focal Area International Waters Project Type FSP

### **GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET**

1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments20 Sept 2024 (ahume): Yes.

Agency's Comments 2. Project Summary

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

Secretariat's Comments20 Sept 2024 (ahume): Yes.

Agency's Comments 3 Indicative Project Overview

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

Secretariat's Comments 20 Sept 2024 (ahume): Partly. Please take note of the following:

a) Please fix Portal formatting so that a consistent font/style is used through the document.

b) GEF efforts to advance policy coherence to see if there are opportunities in the PIF to strengthen policy coherence at the national and regional/transboundary levels.

c) For Output 2.1.2, please explain if a digital portal is really the best approach and already recognized among government stakeholders are the most useful way to strengthen regional collaboration. This is not to question if a Portal is best, but rather to suggest that perhaps the project should first consult with the stakeholders on how/what is the best way to access and share resources, technical and policy reports, and data storage on eCDT systems.

d) The overall project design seems to lack any focus on enforcement or action taken based on the knowledge generated by the eCDT systems. Since a main use of "Electronic catch documentation and traceability systems (eCDTs) is to globally combat IUU fishing, transforming the fisheries sector by improving the accuracy, speed, and accessibility of data critical to fisheries management and decision-making, identifying and preventing illegal and mislabeled products from entering national and international markets, and strengthening MCS systems" (this is a quote from the project) - then where in the PIF is the focus on strengthening efforts to take action on the information that the eCDT systems are providing to countries? How are these eCDT efforts connecting with other existing efforts in each country and regionally already addressing IUU?

e) Please elaborate on how exactly the project is "... strengthen trade relations and access to international markets that are demanding legality and sustainability". The current proposed outputs under Component 3 are focused on fisherfolk and the lower end of the value chain. Where do international market actors factor into the project's design? How are international market requirements regarding addressing IUU being communicated and reflected in the activities of the project?

f) Please provide a response to how, as appropriate for Colombia and Ecuador, the financial mechanisms proposed under Output 1.1.4 are part of the larger sustainable financing discussion for the Eastern Tropical Pacific (via the GEF-8 project with CI) and including the PFP discussion led by WWF and Pew as part of the GEF supported Enduring Earth.

g) What specific fishery(ies) are being targeted by Output 2.1.1?

h) How does the pilot activities under Output 3.1.3. related to electronic traceability pilot systems differ from the implementation of an eCDT action plan under Output 1.1.2?

15 October 2024 (ahume): Addressed.

Agency's Comments Agency's Comments (14 Oct. 24) a) A consistent font/style was used throughout the document in the GEF Portal using Roboto font throughout.

b) The PIF has been strengthened to advance policy coherence at the national, regional and transboundary levels. Please see in particular Section A ?Justification? and ?Stakeholder roles: Governments?, as well as additions under Component 2 of the theory of change.

c) We understand the concern regarding whether a digital portal is the best tool for strengthening regional collaboration. After review we agree that it is important to first consult with government stakeholders and other key actors to determine how they prefer to access and share resources as well as data related to eCDT systems. This consultation will ensure that the solutions implemented effectively meet the needs and expectations of those who will be using these tools. Output 2.1.2 was therefore slightly adjusted in Indicate Project Overview table and in Project Components.

d) We have clarified and expanded on the connections to enforcement in the Project Overview and theory of change.

e) We have clarified in Outputs 3.1.1, 3.1.2, and in the Co-Financing how international market actors and import requirements will be leveraged in the project.

f) It has been mentioned in the project justification and in the section on Coordination and Cooperation with Ongoing Initiatives and Project.

g) Specific fisheries targeted under the project were defined in foot note 3 ?[1] Fisheries preliminarily prioritized by Ecuador: tuna, mahi-mahi, swordfish, titi shrimp. Peru: giant squid, mahi-mahi, hake, and five species of sharks. Chile: anchovy, common sardine, huiro algae.?

h) Output 1.1.2 focuses on creating an action plan to align and strengthen government eCDT systems in Chile, Ecuador, and Peru, ensuring interoperability, adherence to international standards, and data transparency. In contrast, Output 3.1.3 is about implementing and testing these traceability systems in prioritized fisheries, from capture to marketing, to validate and optimize them. While Output 1.1.2 deals with strategic planning and system harmonization, Output 3.1.3 focuses on operational testing through pilot projects.

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

#### Secretariat's Comments

20 Sept 2024 (ahume): Partly. Gender activities are identified in Component 3 of the project. Please be sure that gender dimensions are prioritized throughout the project and integrated into M&E activities per GEF policy. 15 October 2024 (ahume): Addressed.

# Agency's Comments Agency's Comments (14 Oct. 24)

While we are limited by the male-dominated nature of the sector, we have included within our target beneficiaries a focus on women in a number of trainings. We have also committed under Component 2 to using the gender action plan development process (during PPG) to explore how to best incorporate gender in activities beyond just Component 3. Finally, we added an explicit reference to the GEF Guidance on Gender in the monitoring and evaluation section.

#### 3.3 a) Are the components adequately funded?

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

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

#### Secretariat's Comments

20 Sept 2024 (ahume): Partly. The cofinancing ratio across each of the components and PMC is consistency 1:10. This suggests the cofinancing is not a realistic representation but rather a top down application uniformly across the project based on a target amount. Please reevaluate the cofinancing estimate per cofinancing partner?s contribution to specific components and PMC and confirm that the cofinancing value is truly exactly as presented across each component and

15 October 2024 (ahume): Addressed.

# Agency's Comments Agency's Comments (14 Oct. 24)

We have adjusted the co-financing section to better explain the intended private sector partners and their indicative contributions, as well as a more realistic allocation of the co-financing across components in the Indicative Project Overview table.

#### 4 Project Outline

#### A. Project Rationale

#### **4.1 SITUATION ANALYSIS**

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

b) Are the key barriers and enablers identified?

Secretariat's Comments20 Sept 2024 (ahume): Yes.

Agency's Comments 4.2 JUSTIFICATION FOR PROJECT

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

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

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

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

#### Secretariat's Comments

20 Sept 2024 (ahume): Partly. For stakeholders, as noted above, the project seems to not incorporate IUU enforcement as part of the design. Please elaborate on the role of the government in using eCDT systems to enforce IUU regulations.

15 October 2024 (ahume): Addressed.

Agency's Comments Agency's Comments (14 Oct. 24)

We have elaborated on the role of the government in using eCDT systems for enforcement as a specific part of the action plans and implementation activities in the theory of change.

#### 5 B. Project Description

#### **5.1 THEORY OF CHANGE**

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

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

#### Secretariat's Comments

20 Sept 2024 (ahume): No. As noted above, the project appears to assume that eCDT systems and improved transparency will improve MCS, which will reduce corruption and IUU fishing. What about national and regional enforcement of IUU? Beyond improved transparency, how specifically is the project strengthening national and regional ability to act on this additional layer of information to curb IUU? For example, what policies are being targeted for this to feed into? What role will national agencies, coast guard, and/or judicial branch actors have in the project to act on the information provided by eCDT systems? The project?s theory of change needs to be updated to reflect this as a critical pathway towards achieving the GEF?s Core Indicator on more sustainable fisheries.

15 October 2024 (ahume): Addressed.

## Agency's Comments Agency's Comments (14 Oct. 24)

In the components of the theory of change, we have elaborated and clarified how the project will intentionally link transparency to improved enforcement. We have also added a focus on synergies with enforcement projects in the section ?Ongoing Initiatives and Projects?, most directly through including a partnership between WWF and the UNODC?s Global Maritime Crime Program.

#### 5.2 INCREMENTAL/ADDITIONAL COST REASONING

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

#### Secretariat's Comments

20 Sept 2024 (ahume): No. Please revise the ICR to provide more concrete baseline national programs related to eCDT and IUU in each country, including the role of private sector actors, as well as the baseline initiative(s) working towards regional collaboration and a tri-national agreement. Please also elaborate on the baseline work of WWF and UNEP. It is unclear what comparative advantage UNEP brings to this project.

15 October 2024 (ahume): Addressed.

Agency's Comments Agency's Comments (14 Oct. 24)

Section A and Appendix 1 have been strengthened accordingly.

#### **5.3 IMPLEMENTATION FRAMEWORK**

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

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

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

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

#### Secretariat's Comments

20 Sept 2024 (ahume): No. Please address the following:

a) Please be sure the governance structure is fully translated into English.

b) Please clarify what committee WWF would co-chair in the paragraph describing the PSC. Is this the a potential advisory group or the PSC?

c) The Project governance diagram shows a Inter-Institutional Coordination Group but this group is not described in the text. Please describe this group and its role in the project governance.

d) The Project governance diagram shows WWF being both the executing agency and on the project steering committee. This represents a potential conflict of interest. Please include language that describes how conflicts of interest will be avoid in decision making by the PSC.

e) Please revise the project governance section to explain specifically where the PCU will be physically based.

f) For coordination with on-going projects, as noted in comments above, please explain coordination with the GEF-8 Eastern Tropical Pacific project led by CI and the associated work of the PfP discussions led by the GEF funded Enduring Earth project. Please also explain potential coordination with the GEF-7 UNDP project #11011 addressing fisheries value chains in CC and PACA LMEs.

15 October 2024 (ahume): No. Please provide a agency responses to explain how each of the above GEF review comments were addressed. For example, while the very brief agency response below says all the points were addressed, no language is found in the PIF addressing points D and E.

21 October 2024 (ahume): Addressed.

Agency's Comments Agency's Comments (11 Oct. 24)

Points a,b,c, d, e have been addressed in the revised section B. Point f has been addressed in the ?Coordination and Cooperation with Ongoing Initiatives and Project? section.

Agency's Comments (17 Oct. 24)

- a) The governance structure in figure 3 is fully translated into English.
- b) If considered relevant, the PSC may establish advisory groups/ technical working groups for any identified need, e.g., a Private Sector Advisory Committee consisting of buyers (importers) and suppliers (processing plants/exporters). Those mechanisms will be managed and supported by the PCU. The narrative has been refined accordingly.
- c) The Inter-Institutional Coordination Group reflected in the project governance diagram has been further described in the ? Overall Project Governance? section.
- d) While WWF as EA will be on the PSC, both WWF and the PCU will act as the Secretariat of the PSC. The narrative and Figure 3 were amended accordingly.
- e) As described in the Project Governance section, the regional Project Coordination Unit (PCU) whose location will be decided at PPG stage.
- f) The coordination with the GEF-8 Eastern Tropical Pacific project led by CI and the associated work of the PfP discussions led by the GEF funded Enduring Earth project as well as potential coordination with the GEF-7 UNDP project #11011 addressing fisheries value chains in CC and PACA LMEs have been described in the section ?Coordination and Cooperation with Ongoing Initiatives and Projects?.

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

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

# Secretariat's Comments 20 Sept 2024 (ahume): No.

a) Please include an estimate for Core Indicator 7 on shared water ecosystems (LMEs)

b) For CI-8 on fisheries, the estimate at PIF is exceptionally large. Please re-evaluate the estimate and provide a more detailed explanation of the methodology used for this estimate by country. Please explain the logic for how the project can attribute the cited underreporting % was determined.

c) It is noted that the estimated number of female beneficiaries in Core Indicator 11 is much lower then the estimated number of male beneficiaries. Where possible, please consider adjusting the project?s design to better focus on specific activities that will benefit woman and improve this CI?s male-female balance.

d) Please proof read the PIF. This section on core indicators includes text describing the methodology for calculating cofinancing.

15 October 2024 (ahume): Addressed.

Agency's Comments Agency's Comments (14 Oct. 24)

a) Indicator 7 has been added

b) The number has been corrected

c) We have improved the participation of women in the project, proposing specific and exclusive workshops for them that will help the gender balance. Additional efforts will be identified during the PPG phase with the goal of approving the gender balance of the indicator, however, for now we have left the indicator unchanged since it is an estimate based on the actual number of male and female crew members.

d) the document has been proofread again. We did not however see any reference to co-financing in the core indicator section.

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

Secretariat's CommentsN/A

Agency's Comments 5.6 RISKs

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

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 screened and rated at this stage and consistent with requirements set out in SD/PL/03?

Secretariat's Comments

20 Sept 2024 (ahume): Partly. Under risk table, please provide explanation of risk and mitigation measures for the overall risk.

15 October 2024 (ahume): Addressed.

### Agency's Comments Agency's Comments (14 Oct. 24)

An explanation for the overall risk has been provided.

5.7 Qualitative assessment

a) Does the project intend to be well integrated, durable, and transformative?

b) Is there potential for innovation and scaling-up?

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

#### Secretariat's Comments

20 Sept 2024 (ahume): No. Please present a more compelling case for how the project has been designed for durability and potential to scale. Please also add text the speaks to the project?s efforts to promote policy coherence at the national and regional levels (also see comment above about policy coherence in project design).

15 October 2024 (ahume): Addressed.

Agency's Comments Agency's Comments (11 Oct. 24)

In the Justification subsection of the Project Rationale section, details are provided on how the project would achieve durability and has the potential to be scalable.

As noted in our response to 3.1, we have also highlighted throughout the PIF where the project?s contributions will support policy coherence both within each participating country and across all three. Please see in particular Section A ?Justification? and ?Stakeholder roles: Governments?, as well as additions under Component 2 of the theory of change.

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

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

Secretariat's Comments 20 Sept 2024 (ahume): Yes

Agency's Comments

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

Secretariat's Comments

20 Sept 2024 (ahume): Partly, as noted in earlier comments, please provide more elaboration on potential collaboration with the GEF-8 ETP project and GEF-7 UNDP project #11011 addressing fisheries value chains in CC and PACA LMEs

15 October 2024 (ahume): Addressed.

Agency's Comments Agency's Comments (8 Oct. 24)

The section ?Coordination and Cooperation with Ongoing Initiatives and Project.? has been adjusted accordingly.

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

Secretariat's Comments 20 Sept 2024 (ahume): Yes.

Agency's Comments 7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments 20 Sept 2024 (ahume): Yes.

#### Agency's Comments

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

#### Secretariat's Comments

20 Sept 2024 (ahume): Yes, a list is provided under Appendix 2. However, please explain the engagement with local fishing associations for all three countries. Based on the information in Appendix 2, only one fishing association was consulted in Peru. What about discussions in the other countries? Likewise, why were private sector discussion with fish processing plant only occurring in Peru and not other countries? Please explain how key civil society, including local fishing associations, and private sector were engaged in Chile and Ecuador during PIF development and the plan to engage with them further if the PIF is approved.

15 October 2024 (ahume): Addressed for PIF, but many important stakeholders across ALL participating countries will need to be closely consulted during PPG.

Agency's Comments Agency's Comments (14 Oct. 24)

Table 2.2 in Annex 2 was amended to clearly include the private sector and civil society actors that participated in the workshops organized by the Chilean Government and WWF Chile to present and discuss the GEF project. That detail was in the attendance lists attached to the PIF but not in the table itself. It must be noted that the major fishing associations were approached as well as the main NGOs that have common work in fisheries and/or traceability.

#### 8 Annexes

**Annex A: Financing Tables** 

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

**STAR allocation?** 

Secretariat's Comments N/A

Agency's Comments Focal Area allocation? Secretariat's Comments 20 Sept 2024 (ahume): Yes.

Agency's Comments LDCF under the principle of equitable access?

Secretariat's CommentsN/A

Agency's Comments SCCF A (SIDS)?

Secretariat's CommentsN/A

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

Secretariat's CommentsN/A

Agency's Comments Focal Area Set Aside?

Secretariat's CommentsN/A

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

Secretariat's Comments 20 Sept 2024 (ahume): Yes.

Agency's Comments

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

Secretariat's Comments

20 Sept 2024 (ahume): Partly. Please note the following:

•a) As noted in comments above on the co-financing ratios, the listed \$80 million in cofinancing seems to be poorly calculated. Please re-examine the sources and value of cofinancing to better reflect the per component contributions to the proposed project.

b) Similar to above, why is such a highly specific cofinancing number proposed for the private sector when no specific companies are identified. How was this amount determined?

c) Why are UNEP and WWF not providing any cofinancing? If WWF is executing and receiving PMC, then the PMC cofinancing must reflect WWF?s cofinancing commitment.

d) It is noted in the PIF that US seafood buyers will have a role in the project but it seem none are identified as cofinancing partners. Please explain why this is the case.

15 October 2024 (ahume): Addressed

Agency's Comments Agency's Comments (11 Oct. 24)

a) Cofinancing ratios were amended

b) Amended. In the case of Chile, we can?t add the private sector companies in the table because they have not yet committed to CF the project. However, the companies that were involved and showed interest in cofinancing the project in Chile are SONAPESCA, National Fisheries Society, ALIMEX, AMICHILE, Chilean Mussel Farmers Association.

c) Amended to show WWF and UNEP commitments.

d) We have added the role of US seafood buyers and other private sector partners to the cofinancing section and specified the estimated amount in the table. Part of this co-financing will cover PMC (comment c).

**Annex B: Endorsements** 

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

Secretariat's Comments 20 Sept 2024 (ahume): Yes.

Agency's Comments

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

Secretariat's Comments 20 Sept 2024 (ahume): Yes.

Agency's Comments

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

#### Secretariat's Comments

20 Sept 2024 (ahume): No. The template utilized for this project by the three OFPs removed the footnote that conditions the selection of the executing partner to the following: ?Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate?. Per guidance provided prior to the June 2023 Work Program, Agencies were informed that LoEs ?with modifications cannot be accepted and will be returned?. While the removal of the footnote seems to be trivial, it is not: this footnote reduces the chances of having an executing partner that does not meet the fiduciary and procurement standards required to safely execute the project. Please either get new LOEs or upload emails from the OFPs accepting this footnote to be part of the LoE.

15 October 2024 (ahume): Partly addressed. It is noted that OFP LOE footnote support has been uploaded to the Portal for Chile and Peru. However, the OFP LOE footnote support is still missing for Ecuador. Please upload this OFP LOE footnote support for Ecuador.

21 October 2024 (ahume): Addressed. A single file compiling the emails from all three OFPs has been uploaded to the Portal.

Agency's Comments Agency's Comments (14 Oct. 24)

Emails accepting the footnote have been uploaded in the road map.

#### Agency's Comments (17 Oct. 24)

A file with the countries' no objections has been uploaded in the roadmap.

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

Secretariat's CommentsN/A

Agency's Comments Annex C: Project Location

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

Secretariat's Comments 20 Sept 2024 (ahume): No. The map included in the PIF is very blurry and cannot be read. Please include a more readable map.

15 October 2024 (ahume): Addressed.

Agency's Comments Agency's Comments (14 Oct. 24)

The map has been fixed

Annex D: Safeguards Screen and Rating

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

### Secretariat's Comments

20 Sept 2024 (ahume): A SRIF is included in Appendix 3. The project?s overall ESS risk is classified as moderate, and UNEP attached the Safeguard Risk Identification Form (SRIF). SRIF said that ?It triggers SS6 on Displacement and Involuntary Resettlement, and SS8 on Labor and Working Conditions.

In the design of the digitization and traceability system for sustainable fishing, the Project will need to pay attention to social impacts and risks associated with job losses/translations, labor rights and working conditions.? However, it is not clear what is a plan to further assess or avoid, minimize, mitigate, and manage these social risks. Please provide a plan to conduct a social

assessment and develop a social risk management plan during the PPG stage.

15 October 2024 (ahume): Not addressed. Please provide a more comprehensive Agency response and revisions to the PIF that directly explain how the project will address the above point.

21 October 2024 (ahume): Not addressed.

23 October 2024 (ahume): Addressed.

# Agency's Comments Agency's Comments (14 Oct. 24)

Indeed, the social assessment and social risk management plan will be developed during the PPG stage

### Agency's Comments (22 Oct. 24)

The PIF document in the road map was amended accordingly that is in Section B in the safeguard rating sub-section below the risk table describing the plan to conduct a social assessment and develop a social risk management plan during the PPG stage. The text reads as follows; ? In response to the SRIF, it should be noted that the project is committed to conducting a full social assessment in the PPG phase, to ensure that labour and social risks related to fishing are adequately identified, assessed and mitigated. During this assessment, a thorough mapping of the stakeholders involved will be carried out, as well as surveys to understand the current working conditions of workers and expectations regarding the project. Risk matrices will also be used to identify potential social impacts that may arise during implementation. Based on these findings, a social mitigation plan will be developed, which will include solutions such as labour training programmes to mitigate any negative impacts. In addition, performance indicators will be created to monitor the effectiveness of these measures, allowing for adjustments if necessary. This approach will ensure that the project not only meets UNEP and GEF safeguard standards, but also promotes fair and safe working conditions in the fishing sector.?

It should be noted that the portal does not provide any space to paste the same, nor does the UNEP SRIF matrix.

Key risks section

Stakeholder	Low	~	Assessment: There is a risk that inadequate participation of stakeholders, such as fishers, local communities, NGOs, and the private sector, will limit the acceptance and effectiveness
Other	select	~	Enter Comments
Overall Risk Rating	Moderate	~	The overall rating is moderate given the contextual risk including Environment and Social risks and the innovative character of the project which however has the potential to

# Environmental and Social Safeguard (ESS) Risks

We confirm that we have provided indicative information regarding Environmental and Social risks associated with the proposed project or program and any measures to address such risks and impacts (this information should be presented in Annex D).

PIF	CEO Endorsement/Approval	MTR	TE	
Medium/Moderate	~			

Title	Submitted	Actions
Traceability - Appendix 3 SRIF	8 8	ŵ

**Annex E: Rio Markers** 

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

Secretariat's Comments 20 Sept 2024 (ahume): Yes

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments 20 Sept 2024 (ahume): Yes

Agency's Comments

**Annex G: NGI Relevant Annexes** 

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

Secretariat's CommentsN/A

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments 20 Sept 2024 (ahume): Please address above comments and resubmit.

15 October 2024 (ahume): Please address the few remaining above comments and resubmit.

21 October 2024 (ahume): Please address one remaining comment about safeguards (8.7) above and resubmit.

23 October 2024 (ahume): The project is being recommended for technical clearance. Please take note of the below additional comments to address during PPG.

Agency's Comments

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

Secretariat's Comments 20 Sept 2024 (ahume):

a) Please provide a plan to conduct a social assessment and develop a social risk management plan during the PPG stage (see ESS comment above)

15 October 2024 (ahume): In addition to the above, please also note:

b) Please ensure key stakeholders, including local communities, local fisherfolk and fishing organizations, and private sector entities, are closely consulted for all three participating countries. It will be expected by CEO Endorsement that there is clear evidence and contributions from these stakeholders into the project's final design.

c) Please continue to ensure that gender dimensions are prioritized throughout the project design per GEF policy.

d) Please continue to improve the project's final design to ensure that the project deliverables directly contribute to/feed into national and regional IUU enforcement.

e) Please continue to define co-financing partners, especially private sector across the fisheries value chains.

f) Please ensure that collaboration and mechanisms for coordination with the GEF-8 ETP project and GEF-7 UNDP project #11011 are finalized and clearly explained in the final project design.

	<b>PIF Review</b>	Agency Response
First Review	9/30/2024	
Additional Review (as necessary)	10/17/2024	
Additional Review (as necessary)	10/21/2024	
Additional Review (as necessary)	10/23/2024	
Additional Review (as necessary)		

Agency's Comments **Review Dates**