

# Integrated Management of Small Island Landscapes and Seascapes in the Philippines (ISLAS)

Review PIF and Make a recommendation

## Basic project information

**GEF ID**  
12004  
**Countries**  
Philippines  
**Project Name**  
Integrated Management of Small Island Landscapes and Seascapes in the  
Philippines (ISLAS)  
**Agencies**  
UNDP  
**Date received by PM**  
9/5/2025  
**Review completed by PM**  
3/17/2026  
**Program Manager**  
Jurgis Sapijanskas  
**Focal Area**  
Biodiversity  
**Project Type**  
FSP

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

### 1. General Project Information / Eligibility

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

**b) Is the General Project Information table correctly populated?**

Secretariat's Comments

JS 1/26/2026 - Cleared.

JS 12/10/2025

Thank you for the thorough revisions and responses throughout the review sheet.

While the core indicator targets have been increased and the scale of direct impact clarified, the targets remain small (80,000 ha of direct impact for a total GEF funding of \$6 million and \$42 million of co-financing). We understand that, by construct, the terrestrial area of islands are limited and that there are higher costs associated with working on islands. However, the fate of marine biodiversity near islands depends on management at larger scales. We also note that only one of the protected areas of Marinduque is included in the core indicator targets . Please consider:

- expanding the marine area benefiting from projects activities in line with an integrated seascape approach as per the GEF-8 Biodiversity Strategy

-Given the project is to promote a ridge to reef approach, please also consider including all protected areas of the targeted islands and ensure they directly benefit from project interventions

Please also include in the portal entry a justification for higher costs per unit area for work on the targeted island ecosystems compared to typical projects in the Philippines.

1- Cleared

JS 9/12/2025 - Thank you for the submission of this PIF. While it is overall well aligned with the GEF-8 BD strategy, the project currently has too low of a cost efficiency in the delivery of GEBs, has an incomplete baseline so that the increment is not sufficiently clear, and lacks a convincing strategy for replication / scaling up. Addressing the latter will likely require strong interventions embedded in the design given the challenges of replicating in 7,000+ small islands across the Philippines, especially when part of the approach in this project is to develop financial mechanisms tailored for the context of each targeted islands, which does not appear to be an easily scalable approach to funding biodiversity action in small islands.

The review sheet contains details on these main points, as well as other detailed comments. Please address and resubmit.

1- The text in the portal entry has different font sizes. Please homogenize.

Agency's Comments

Agency's Comments: 10/20/2025

Regarding the font size, we apologize for the inconvenience, but it seems to be an issue with the GEF portal, which sometimes adjusts it to different fonts and sizes when we paste the original well formatted text into the portal. Unfortunately, we are unable to make any changes to this.

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Agency's Comments: 23 Jan 2026

We appreciate the opportunity to clarify the project's design logic and cost-effectiveness. Below we respond to the three major points of concern raised, addressing scale of influence, integrated seascape design, and the focus of direct interventions. In addition, the "Enabling Baseline Conditions and Project Approach" section has been updated with new narrative explicitly explaining the project's cost-effectiveness, including the use of OECMs as a lower-cost pathway for conservation estate expansion, sequencing of financing mechanisms, and the role of the DENR-BMB Blue and Green Islands Framework in enabling scalable impact.

### **1. Scale of management and marine biodiversity outcomes**

While we recognize that marine biodiversity outcomes are influenced by processes operating beyond individual sites, the project is intentionally designed around **small-island systems as ecological leverage points**, where locally governed actions can exert a disproportionate influence on nearshore marine biodiversity.

In small-island contexts, four structural characteristics justify this scale of intervention:

1. **Tightly coupled ridge-to-reef systems.**  
Small islands typically have watersheds with limited geographic extent and limited buffering capacity, meaning that land-use decisions, erosion control, and wastewater management directly and rapidly affect adjacent coral reefs, seagrass beds, and mangroves.
2. **Nearshore dominance of pressures.**  
For island-associated marine biodiversity, the most significant pressures (i.e., sedimentation, nutrient loading, destructive fishing, and habitat damage) are driven primarily by nearshore activities under local jurisdiction, rather than by offshore processes.
3. **Alignment of governance and ecological boundaries.**  
Island boundaries often coincide with governance boundaries, allowing terrestrial, coastal, and fisheries management to be integrated in ways that are rarely feasible at larger seascape scales.
4. **Non-linear ecological response.**  
Island ecosystems frequently exhibit threshold dynamics, whereby relatively modest reductions in pressure can trigger disproportionate ecological recovery once key stressors are addressed.

Taken together, these characteristics mean that island-scale ridge-to-reef management is not a simplification of larger-scale seascape management, but a **strategic leverage point** for influencing marine biodiversity outcomes.

### **2. Integrated seascape approach and marine area benefiting from project activities**

The project's ridge-to-reef design represents an **integrated seascape approach tailored to small-island systems**, consistent with the intent of the GEF-8 Biodiversity Strategy. Rather than maximizing the spatial footprint of marine interventions, the project prioritizes **functional integration across land, coastal, and nearshore waters**, addressing the upstream and governance drivers that most strongly influence marine biodiversity in island settings.

In this context, expanding the nominal area of marine coverage without addressing terrestrial and governance drivers would risk diluting effectiveness. The project therefore defines "benefiting area" in terms of **ecological influence and driver reduction**, not solely mapped extent. Marine areas beyond the directly managed zones benefit indirectly through reduced sedimentation, improved fisheries governance, strengthened compliance, and coordinated island-scale planning arising from the ridge-to-reef approach.

### **3. Inclusion of protected areas and focus on OECMs**

The project deliberately prioritizes **Other Effective Area-Based Conservation Measures (OECMs)** and other under-regulated areas as the primary focus of direct intervention. This is a

strategic choice grounded in cost-effectiveness and impact, rather than an omission of existing protected areas.

While formal protected areas exist in the target islands, many already operate under established management frameworks and receive baseline support. In contrast, OECMs such as Local Conservation Areas, Community-Based Forest Management Areas and locally governed marine areas represent the **greatest opportunity for cost-effective conservation estate expansion**, particularly in small-island contexts where new protected area designation is often socially or politically constrained.

Spreading limited project resources across all existing protected areas would reduce depth of intervention and weaken the project's ability to establish durable governance, financing, and stewardship models. Instead, the project focuses on **delivering well-functioning OECMs**, as mechanisms to increase protection coverage in addition to existing protected areas, through strengthening governance, stewardship, financing, and compliance in areas where biodiversity outcomes are most sensitive to local decisions. Formal protected areas nevertheless benefit indirectly through improved island-scale governance, coordinated planning, and reduced upstream and nearshore pressures, even where they are not the primary recipients of direct investments.

Taken together, the design approach explains the higher cost per directly managed hectare relative to mainland projects, while demonstrating strong cost-effectiveness in terms of biodiversity outcomes, institutional durability, and scalability. The project emphasizes depth, leverage, and replicability over extensive area coverage, aligning with the ecological and governance realities of small-island systems.

## 2. Project Summary

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

Secretariat's Comments

JS 3/17/2026 - Cleared.

JS 3/9/2026

While this item was cleared previously, given the revisions made to the project to address other comments, please :

1- strengthen the justification of the project's focus by adding that the Philippines is a mega diverse archipelago of over 7,600 islands where small islands are underrepresented in the protected area system. The summary currently only mentions that small islands are underrepresented, without specifying in what they are underrepresented.

2- including the project objective at the very start of the 2nd paragraph to clarify that this project is to expand the biodiversity conservation estate and deliver scalable ridge-to-reef management models in priority small islands to secure biodiversity, climate resilience, and ecosystem services.

3- Reformulate "with replication enabled through implementation of the Philippine Biodiversity Strategy and Action Plan (PBSAP) via policy mainstreaming and strengthened governance, finance, and NbS instruments" by the following that is included elsewhere in the project, which is clearer: "Creates replication and learning architecture anchored in implementation of the Philippine Biodiversity Strategy and Action Plan (PBSAP) through DENR/BMB mandates, Local Government Unit adoption, and national policy, finance, and registry mechanisms".

JS 1/26/2026 - Cleared.

JS 12/10/2025

A- The summary starts with "The Philippines' small islands are globally significant". Please clarify in what respect they are globally significant. We assume it is meant to be hosts globally significant biodiversity?

1- Please see comment in the first comment box on core indicator targets.

2-Cleared.

JS 9/24/2025 -

1- Please see comment on core indicator targets and revise accordingly.

2- Please include a sentence on the approach to replication/scaling-up in the summary.

### Agency's Comments

Agency's Comments: 10/20/2025

The project summary has been updated accordingly.

1. Core Indicator targets updated. Summary revised to reflect corrected, non-overlapping CI totals: CI-2 = 62,478 ha (Panaon Island Protected Seascape; LMMAs nested), CI-1 = 11,963 ha (Marinduque + Mt. Timpoong/Hibok-Hibok), CI-4 = 4,000 ha (CBFMAs outside PA/Seascape), CI-3 = 1,500 ha (PPG to finalize polygons/overlaps), CI-5 = 399 ha (marine habitats outside PAs/OECMs), CI-6 = 125,520 tCO<sub>2</sub>e, CI-11 = 3,000 beneficiaries (50% women).

2. Summary updated to state scaling via standardized modules?governance (inter-LGU alliances/OECM pathway), finance (PENCAS/BIOFIN, PES, reef insurance), and NbS packages?codified for uptake through DENR-FASPS and the Blue & Green Islands framework to enable cost-effective replication to additional islands.

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Agency's Comments: 23/Jan/2026

A, 1 Thank you for this comment. The Project Summary has been revised to clarify that the project's global significance derives from the biodiversity and ecosystem services hosted by the target island systems, rather than from the absolute size of the areas under direct management. The revised text emphasizes that these small-island ecosystems contain globally significant coral reefs, seagrass beds, mangroves, and endemic terrestrial species, and that the project's ridge-to-reef approach addresses the land- and sea-based drivers that most strongly influence nearshore marine biodiversity in island contexts. The summary also clarifies that the project's broader global value lies in demonstrating a scalable and cost-effective model for conservation estate expansion through OECMs integrated with local governance and sustainable livelihoods, with replication enabled through the DENR-BMB Blue and Green Islands Framework.

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Agency's Comments: 17/Mar/2026

The Project Summary in the PIF has been revised to address all three comments. The opening paragraph now clarifies that the Philippines is a mega-diverse archipelago of over 7,600 islands where small islands remain underrepresented in the national protected area system. The project

objective has been moved to the beginning of the second paragraph as requested. The replication sentence has been reformulated to reflect that the project creates replication and learning architecture anchored in implementation of the Philippine Biodiversity Strategy and Action Plan (PBSAP) through DENR/Biodiversity Management Bureau mandates, Local Government Unit adoption, and national policy, finance, and registry mechanisms. Minor wording adjustments were made to comply with the GEF portal's 250-word limit for the Project Summary.

### 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

JS 1/26/2026 - Cleared.

JS 12/10/2025

b4 - Thank you for the clarification. We recommend using the terms "results-based" or "outcome-based" or "performance-based" financing mechanisms, which is more commonly used and clearer.

The rest is cleared.

JS 9/12/2025

a1- The first part of the objective is "To expand the biodiversity conservation estate" but none of the outputs & outcomes include explicit expansion of the area under conservation. If this is part of the project objective, which we recommend, please ensure there are clear output(s) related to PA or OECM creation/expansion, corresponding target(s) on core indicators 1.1,2.1,4.5 or 5.3 and a related causal pathway in the ToC.

a2- Please consider streamlining the project objective by removing "by using an IEM framework", which speaks to the means, not the objective.

b1 - Please expand acronyms when first used in the log-frame (e.g. IEM, NCA, etc.)

b2- Please explain the difference between output 2.1.1 and output 1.1.1, which are both to carry out NCA and revise the titles of the outputs to make clear that there is no overlap.

b3- Component 2: Please clarify what is meant by scalable in *scalable integrated approaches and financing mechanisms for small island ecosystems*. It is unclear from description how scaling (see STAP's document *Taking Nature-Based Solutions Programs to Scale* <https://cdn.unenvironment.org/stapgef/public/2021-06/Taking%20Nature%20Based%20Solutions%20to%20Scale%202021-01.pdf>) would happen, especially when the approach to financing is to develop tailored financial mechanisms for the context of each small island targeted. Please see related comment on the ToC and revise.

b4- Outcome 2.2: Biodiversity conservation enhanced through ecosystem-based financing: Please explain in the portal entry what does *ecosystem-based financing* mean.

#### Agency's Comments

Agency's Comments: 10/20/2025

**a1.** Inserted **key activities** that operationalize estate expansion and aligned **CI targets** and the **ToC**.

? Under existing **Output 2.1** (area-based management): add activities to (i) **prepare and file WDPA documentation** for the **Panaon Island Protected Seascape (62,478 ha; RA 12238)** in coordination with DENR/BMB/UNEP-WCMC; and (ii) **initiate seascape-wide plan implementation** (governance, enforcement, finance).

? Under existing **Output 1.1 / 2.1** (governance/tools): add activities to **document and submit 4,000 ha of CBFMAs for OECM recognition** outside PA boundaries, including mapping, tenure verification, community consultations/FPIC as applicable, and DENR/BMB review.

? **CI alignment (no double counting): CI-2 = 62,478 ha; CI-1 = 11,963 ha; CI-4 = 4,000 ha** (outside PAs/Seascape); **CI-4.5 = contextual flag only for the same CBFMAs; CI-5 = 399 ha** (outside PAs/OECMs).

? **ToC:** Added an **estate expansion? activity node** under existing outputs linking **legal recognition (WDPA/OECM) + governance/finance uptake + sustained management effectiveness + CI-2/CI-4 GEBs**, with assumptions on designation timelines and FPIC where applicable.

**a2.** Objective streamlined to focus on outcomes; removed ?by using an IEM framework,? which describes means.

**b1.** Acronyms have been expanded when first used.

**b2.** This is a question of NCA development or enabling and application. Roles clarified - **1.1.1 = NCA enablement** (guidance, data standards, toolkit, capacity, policy/budget integration); **2.1.1 = NCA island application** (service valuation, participatory analysis, PA/OECM planning, PES/reef-insurance pricing, LGU budgets). Output titles and activities revised to eliminate overlap.

**b3.** Approach: The term ?scalable? has been clarified in Component 2 to mean the replication of standardized modules?governance, finance, and restoration templates?that can be adapted by other LGUs. These standardized modules mean **repeatable interventions** that another island can run with only a few local numbers changed (e.g., fee %, closure length, PES rate)?**not** completely new re-designs. Consistent with STAP?s scaling approaches, the project will (i) **scale out** by providing a simple **guidelines on approach** (e.g., MoUs/bylaws, fee-reinvestment rules, PES/reef-insurance contracts, monitoring sheets) so LGUs can replicate the same designs; (ii) **scale up** by locking those designs into **policy/budget instruments** (PENCAS/NCA budget codes, DENR memos), enabling routine financing; and (iii) **scale deep** by embedding **behavior change** (norms on no-take compliance, stewardship incentives) to sustain uptake. Component 2 now specifies a short **minimum conditions? checklist** per intervention, while the ToC adds an explicit **replication pathway** (meets conditions + uses recipe ? similar results), with adoption routed via **DENR-FASPS / Blue & Green Islands**.

**b4.** Ecosystem-based financing? defined in the portal as **financing tied to measured ecosystem outcomes**, operationalized through **LGU biodiversity budgeting, eco-tourism reinvestment, and conditional instruments (PES, reef insurance)** with MRV and NCA/BIOFIN for costing and budget tagging; payers and beneficiaries are specified.

**Ecosystem-based financing** means financing mechanisms whose **payments and budget allocations are explicitly tied to ecosystem outcomes** (e.g., improved PA/OECM management, verified NbS results) and tracked through simple MRV. In ISLAS this includes: **biodiversity-linked LGU budgeting** (budget lines matched to PA/OECM plans and indicators), **eco-tourism reinvestment** (a share of visitor/operator receipts earmarked for reef patrols, mangrove ANR, etc.), and **conditional instruments** such as **Payments for Ecosystem Services (PES)** and **reef insurance**, where disbursements depend on verified performance or trigger events. These instruments use NCA/BIOFIN tools for costing, tagging, and reporting, with **payers** (LGUs, operators, resource users) and **beneficiaries** (PA/OECM managers and community stewards) clearly identified.

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Agency's Comments: 23/Jan/2026

#### **B4. Financing terminology:**

Thank you for the suggestion. References to 'ecosystem-based financing mechanisms' have been revised throughout the PIF to use the clearer and more standard formulation '**performance-based financing mechanisms,**' consistent with commonly used GEF/UNDP terminology.

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

Secretariat's Comments JS 9/24/2025 - Cleared.

Agency's Comments

**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 JS 9/24/2025 - Cleared.

Agency's Comments

#### **4 Project Outline**

##### **A. Project Rationale**

##### **4.1 SITUATION ANALYSIS**

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

**b) Are the key barriers and enablers identified?**

Secretariat's Comments

JS 12/10/2025 - cleared.

JS 9/24/2025

a- Please clarify in the portal entry the human population of each of the targeted islands and its recent or projected trend.

b- Please clarify the definition of NbS and OECM in the portal entry and what they mean in the context of this project. e.g. the definition used in the Philippines' draft OECM framework, the criteria used for what qualifies as a OECM or NbS, etc.

## Agency's Comments

a. The populations of the targeted islands have been added to the PIF narrative. Further details are provided below.

- **Camiguin Island province**

**2010 Census:** 83,807 (population growth rate from 2000-2010 was 1.22%)

**2020 Census:** 92,808 (PGR from 2010-2020 was approx. 1.07%)

**2024 POPCEN CBMS:** 94,892 (as of 01 July 2024)

Assuming a PGR of 1.07% from 2020-2030, Camiguin is projected to have a population of 103,230 by 2030.

- **Panaon Island, Southern Leyte** (covers municipalities of Liloan, Pintuyan, San Francisco, and San Ricardo)

**2010 Census:** 54,684 (population growth rate from 2000-2010 was 1.11%)

**2020 Census:** 58,938 (PGR from 2010-2020 was 0.78%)

**2024 POPCEN CBMS:** 57,999 (as of 01 July 2024); negative PGR of 0.40%

- **Marinduque province**

**2010 Census:** 227,828 (population growth rate from 2000-2010 was 0.47%)

**2020 Census:** 239,207 (PGR from 2010-2020 was 0.50%)

**2024 POPCEN CBMS:** 226,522 (as of 01 July 2024); negative PGR of 1.33%

b. The PIF has been updated with inclusion of definitions of NbS using the **IUCN Global Standard** (project NbS: reef closures/compliance, mangrove ANR, agroecology, watershed measures linked to CI-1/2/3/4/5) and to define **Other Effective Conservation Measures (OECM)** per **CBD/ DENR/BMB draft national framework's definition**: areas that are achieving the long term and effective in-situ conservation of biodiversity outside of protected areas a ISLAS treats CBFMAs outside PAs as OECM candidates that meet criteria on governance, effective management, and long-term security; hectares are **counted under CI-4.1/4.2** and **flagged under CI-4.5** (contextual) to avoid double counting. The **Panaon Seascape** is reported under **CI-2** with nested LMMAs not double-counted.

## 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

JS 3/17/2026 - Cleared.

JS 3/9/2026

Thank you. Please revise the section "**Scaling Strategy and Durability**" accordingly. Please also ensure that this section refers to the specific project outputs / outcomes that are directly enabling replication / scaling, and that a comprehensive theory of change for scaling will be developed during PPG.

Please also explain in the PIF, in concrete terms, what "Replication through the national biodiversity implementation system led by DENR-BMB" means. What is the NBSAP "implementation system" and how will it be able to promote replication/scaling of ISLAS' approach?

JS 1/26/2026 -

c- Thank you. However, it is still unclear what the Blue and Green Islands Framework is and how it would help with replication/scaling up in practice. Please clarify when it was created, what it provides (Policy objectives? Technical assistance? Training? Funding or other incentives? Knowledge & Learning platform? ) to whom (islands LGUs?), what it has achieved/done already (e.g. how many islands engaged?), and if these size of associated the national budget line, if any.

The rest is cleared.

JS 12/10/2025

b- No. We note the addition of the section "Future Scenarios and Adaptive Management". However, the description of each driver and responses embedded in the project design are too sparse and generic. Please provide a context-specific and slightly more detailed elaboration. On climate please notably see STAP guidance on climate risk screening and expected data underpinning ([https://www.thegef.org/sites/default/files/council-meeting-documents/EN\\_GEF.STAP\\_C.56.Inf\\_03\\_STAP%20guidance%20on%20climate%20risk%20screening.pdf](https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.STAP_C.56.Inf_03_STAP%20guidance%20on%20climate%20risk%20screening.pdf)). The World Bank provides a useful sources for climate projections for the Philippines: <https://climateknowledgeportal.worldbank.org/country/philippines>. On demographic pressure, additional explanation is necessary as responses in this review sheet show that two of the three targeted islands are displaying human population reduction rather than increasing demography. On market shocks, it is unclear how LGU budget, which may partially depend on tax revenues linked to tourism, would be able to compensate with additional biodiversity financing.

c- Thank you for the revisions. Please describe the DENR-BMB Blue and Green Islands program in the baseline. It is mentioned several times in the document but never described. In particular, please describe how it would be able to carry out the scaling planned in the project design.

The rest is cleared.

JS 9/24/2025

b- No, the PIF does not demonstrate that it has been designed to ensure resilience to future change in systems' drivers. Please refer to STAP's brief on the use of simple future narratives to design resilient and durable projects (<https://www.stapgef.org/resources/advisory-documents/simple-future-narratives-brief-and-primer>) and develop simple narratives of the range of plausible futures of priority system's drivers that are outside the control of the project. Please also ensure the portal entry explains to what extent the project design is robust to these changes, with adaptive management as necessary.

c1- While relevant national policies the project plans to build on are presented in this section of the portal and that a few baseline GEF projects are mentioned in the section related to the ToC, the baseline appears incomplete. Please:

-clarify the baseline in terms of spatial planning in the target geographies (existing institutions or process with mandate for spatial planning, existing spatial plans if any), and

- clarify how the project relates to and will build upon the following projects:

- GEF-7 project 10386 Natural Capital Accounting and Assessment: Informing development planning, sustainable tourism development and other incentives for improved conservation and sustainable landscapes FSP Philippines UNEP, which is carrying out a similar approach in other areas and building Philippines' national capacity on NCAA. A clear explanation of how the new PIF adds value, rather than duplicates this GEF-7 project in another geography is required.

-GEF-7 project 10431 Partnerships for Coral Reef Finance and Insurance in Asia and the Pacific MSP Regional ADB, which is already working on coral reef insurance in the Philippines.

- GEF-7 project 11041 Transforming policy and investment through mainstreaming rapid approaches for natural capital assessment and accounting MSP Global IADB, which has been developing rapid NCA methods with Stanford's NatCap Project that could be applied in this project.

- GBFF project 11600 Philippines Biodiversity Financing Program GBFF Philippines UNDP, which is to work on BD financing mechanisms building on BIOFIN results like this proposed PIF.

- GBFF project 11589 Strengthening Globally Significant Biodiversity Corridors in the Philippines through Local Community Empowerment GBFF Philippines ADB, which complements the baseline cited on corridors and is also working towards local community empowerment.

- Given similarity in focus and approach, the GEF-8 Blue and Green Islands Integrated Program (11250 Blue and Green Island Integrated Programme PFD Global UNDP). It would notably be useful to clarify how the project has learnt and plans to learn from, if not collaborate with, the Knowledge management function of the BGI IP global platform (11266 BGI IP Global Coordination Project FSP Global UNDP).

c2 - for the GEF project listed in the project as forming the baseline, please add the GEF ID, time period of implementation, and full title of the projects references. For instance the following, among others, are mentioned: 15826 *Strengthening National Systems to Improve Governance and Management of Indigenous Peoples and Local Communities Conserved Areas and Territories*; 9584 *Integrated Approach in the Management of Major Biodiversity Corridors (IA-Biological Corridors)*.

d1- While the role of most relevant stakeholder groups are well described in the narrative, the role of the private sector is unclear. Please complement.

d2- Likewise stakeholders' roles in the financial mechanisms to be developed, and in particular who is to contribute/pay, who is to manage funding and who is to benefit is unclear. Please revise.

Agency's Comments

Agency's Comments: 10/20/2025

b. Text inserted in Section A/Drivers describing how project design incorporates adaptive measures for climate, market, governance, and demographic futures, with annual scenario reviews guiding grant reallocation, financing switches, and enforcement continuity.

c1. Section A expanded to include spatial-planning baselines and clear linkages with nine GEF/GBFF projects. The six noted by GEFSEC are now described with their relevance, and three additional baseline projects (GEF 9584, 5826, 3606) provided by UNDP/BMB are incorporated to show geographic and institutional continuity in the project areas.

c2. Additional details provided for the mentioned complementary projects.

d1. & d2. The narrative under **Project Approach / Enabling Baseline Conditions** now defines private-sector participation, and **Component 2, Outcome 2.2** clarifies roles per mechanism. Private actors (tourism operators, insurers, banks/credit providers) will be engaged through **BIOFIN** during PPG to co-design and co-finance instruments. In **eco-tourism reinvestment**, **payers** are visitors/operators (a set % of receipts), **fund managers** are LGUs (ring-fenced accounts) with **DENR-BMB** oversight, and **beneficiaries** are PA/OECM managers and community stewards. In **reef insurance**, **payers** are LGUs/operators (premiums), **managers** are insurers with LGU/BMB as policyholders/beneficiaries, and **beneficiaries** are reef management units receiving payouts for rapid restoration/enforcement. In **PES**, **payers** are LGUs/operators/resource users, **managers** are LGU-hosted funds with BIOFIN-aligned tagging, and **beneficiaries** are community/PA stewards upon verified performance. In **biodiversity-linked LGU budgeting**, **payers** are public budgets, **managers** are LGUs, and **beneficiaries** are PA/OECM managers and communities implementing agreed actions. Specific partners will be confirmed at CEO Endorsement following PPG market sounding and MOUs.

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Agency's Comments: 23/Jan/2026

b. This comment required revisions to two elements of the Project Outline: **Section A.2 (Threats and Drivers)** and the **Project Outline narrative addressing future scenarios and adaptive management**, located between Sections A.2 and A.3.

**Section A.2 ? Threats and Drivers:**

Section A.2 has been updated to provide a more context-specific and evidence-based description of key drivers, including climate stressors, demographic pressure, market exposure, governance fragmentation, and ecological degradation. Climate drivers are now grounded in Philippines-specific data from the World Bank Climate Risk Profile and framed consistently with STAP climate risk screening guidance. Demographic pressure was clarified using verified census and administrative data, correcting the assumption of population decline and explaining how episodic, mobility-driven population surges create peak loads on ecosystems and LGU services. Market shocks and governance gaps are now described with explicit causal links to LGU budget constraints and enforcement limitations, rather than as generic risks.

**Project Outline ? Future Scenarios and Adaptive Management (Question 4.2):**

In addition, the previously brief ?Future Scenarios and Adaptive Management? content has been replaced with an expanded, design-anchored paragraph inserted at the end of Section A.2, immediately prior to Section A.3. This text explicitly describes how the project?s governance arrangements, financing approaches, and ridge-to-reef interventions are structured to remain robust under plausible future climate, demographic, economic, and institutional conditions, consistent with STAP guidance on climate risk screening and adaptive project design.

c. Additional information describing the DENR-BMB Blue and Green Islands program has been added to the PIF (p.13).

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Agency's Comments: 30/Jan/2026

Thank you for this comment. Informal policy coordination and planning discussions were incorrectly framed as a 'Blue and Green Islands Framework'. The PIF has been revised to remove references to a specific national Blue and Green Islands framework.

Importantly, this revision does **not** weaken the project's scaling logic. Replication and scale-up under ISLAS are anchored in a **clearly defined national scaling mechanism** composed of existing, adopted instruments and mandates, including:

- (i) implementation of the Philippine Biodiversity Strategy and Action Plan (PBSAP) through LGU adoption and policy mainstreaming;
- (ii) DENR/BMB-led operationalization of OECMs and associated registry processes;
- (iii) statutory uptake of natural capital accounting under the PENCAS Law (RA 11995);
- (iv) domestic biodiversity finance mechanisms supported through BIOFIN; and
- (v) integration into LGU planning, budgeting, and ordinance systems (e.g. CLUPs, AIPs, Environment Special Accounts).

Together, these instruments constitute the **national scaling system** through which ISLAS interventions can be replicated without reliance on a single branded program or dedicated budget line.

At the PIF stage, the project therefore **establishes and documents this scaling architecture explicitly**. The PPG phase will focus on operational design—refining site selection criteria, sequencing technical assistance and learning activities, and tailoring financing modalities based on LGU capacity and fiscal conditions—rather than on defining the existence or authority of the scaling mechanisms themselves.

The revised text reflects this clarification and distinguishes clearly between (i) the national instruments that enable replication and (ii) PPG-level design work required to operationalize them in specific island contexts.

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Agency's Comments: 17/Mar/2026

The **Scaling Strategy and Durability** section of the PIF has been revised to clarify replication pathways in implementation terms. The text now explains that replication will occur through the **PBSAP implementation system led by DENR/BMB**, including LGU planning instruments (CLUP/FLUP), the national PA and **OECM** frameworks, and biodiversity finance mechanisms such as **BIOFIN** and **PENCAS**. The section now explicitly references the project outputs that enable replication (**Outputs 1.1.1, 1.1.2, 2.1.2, and 2.2.2**) and clarifies that a detailed Theory of Change for scaling and replication will be further elaborated during the PPG phase.

## 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

JS 3/9/2026- Cleared.

JS 1/26/2026 -

a1.2. Thank you. However "Restoration and Stewardship *Outcomes*" is not appropriate as a title for a causal pathway. Outcomes are the results sought. They do not convey what the specific project interventions are to achieve them. Please revise. We suggest e.g. "Integrated assessments and targeted NbS-implementation support"

JS 12/15/2025

a1.1. Thank you for the thorough revisions of the ToC narrative. The narrative focusses on three causal pathways that do not exactly map to the project components, when the ToC diagram is structured around the 3 project components. Please ensure that how components relate to causal pathways is made clear, and reciprocally.

a.1.2. The third causal pathway is titled "*Restoration and Livelihoods*" when the subsequent elaboration and project interventions are mainly related OECMs, PAs, and their management effectiveness, not on restoration. Please explain why restoration is highlighted instead of conservation, or revise. In addition, the ToC seems to take the link between livelihood interventions and BD outcomes as granted when the literature shows the effectiveness of the approach is limited. Please see STAP advisory document (<https://www.stapgef.org/index.php/resources/background-note/alternative-livelihoods>) and revise accordingly, including by clearly identifying and testing assumptions to ensure that the proposed livelihood activities are likely to support environmental objectives, and ensure project M&E contributes to improving the evidence base for whether alternative livelihood approaches can deliver GEBs.

a1.3. The project promises to scale deep by "embedding stewardship values through community protocols, education, and gender-responsive participation, ensuring long-term shifts in norms and practice". While we note plans to support the establishment of financial incentives (results-based financial mechanism), norms (new OECMs) and output 2.2.3 targeting woman empowerment, it is unclear to what output or project intervention "community protocols" and "education" refer to. We failed to find any output/intervention linked to it. Please explain or revise.

a.1.4. It is unclear from the ToC narrative and diagram how the barrier "weak enforcement of environmental laws" will be addressed. Please clarify.

b4- Thank you for the response and edits. However it is still not clear why 2.1.3 would provide plain grants for "mangrove rehabilitation, reef monitoring, agroecological restoration, native seedling nurseries, and community-based ecotourism", which could likely be funded through the Stewardship agreements & performance-based grants of 2.1.2. Please also clarify why 2.1.2 and 2.1.3 are planned as providing pure grants only. Please consider expanding to other more innovative forms of financing that would enable private sector mobilization through blended finance.

The rest is cleared.

JS 9/24/2025

a1- Thank you for the clear ToC diagram. However, we failed to find an adequate ToC narrative. While there remain diverse ways of presenting a ToC, key issues are to communicate clearly the causal pathways by which interventions are expected to have the desired effect

The following paragraph seems to be an attempt to explain the causal pathways but is rather a list of interventions mapped to barriers without explaining how they would lead to change, let alone combine to results in the project's higher-level outcomes and objective:

To address disjointed planning, and weak enforcement and mandates (Barriers 1 and 2), the project t policy by embedding biodiversity priorities in local ordinances, development plans, and budgets. To c implementation barriers (Barriers 2 and 4), it develops tools for participatory zoning, OECM recogniti prioritization across ridge-to-reef systems. To resolve financing gaps (Barriers 3 and 4), it integrates strengthening with on-the-ground actions, PA management, and the development of community ente poor monitoring systems and the limited use of evidence in decision making (Barrier 4), the project o accessible platforms supporting adaptive management and showcasing replicable scientific and evi approaches in addressing the vulnerabilities of island ecosystems.

Other items omitted from the current ToC include:

- Clear identification of actions needed from actors outside the current intervention, and whether the current intervention needs to do anything to encourage or align with these actions outside its immediate sphere of control
- Critical justification that the causal pathways are collectively necessary and sufficient
- Explicit attention to issues of scaling and durability of the impacts intended for the intervention (especially, for GEF, of the global environmental benefits), including changes in policy, governance and culture that may be required for transformative scaling. On scaling, please see STAP's document *Taking Nature-Based Solutions Programs to Scale* <https://cdn.unenvironment.org/stapgef/public/2021-06/Taking%20Nature%20Based%20Solutions%20to%20Scale%202021-01.pdf> and ensure that the project's strategy for scaling is embedded in the ToC.

Please refer to STAP's guidance on ToCs (<https://www.stapgef.org/resources/advisory-documents/theory-change-primer>) and revise.

a2- In addition, the numbering and characterization of barriers in the paragraph pasted above does not correspond to the barriers identified in section A of the portal entry. Please revise to ensure consistency.

b1- output 1.1.2: Please clarify in the portal entry what the project intends to do under this output related to OECMs? What does "Support *demonstration of* Indigenous Communities Conserved Areas as OECM models" mean in practice?

b2 - Output 1.2.2: Please clarify whether "community protocols for benefit sharing" are meant in the sense of the Nagoya Protocol. If so, please include BD-2-2 (Implementation of the Nagoya Protocol on Access and Benefit Sharing) in the programming of funds for the related share of the budget dedicated to this activity.

b3. Output 2.1.2: Please consider broadening the scope of activities to include identification of societal challenges to be addressed by NBS, which may go beyond resilience, and that related targets are included in the stewardship agreements and performance-based grants.

b4: output 2.1.3: Please clarify the difference between this output and the performance-based grants mentioned under 2.1.2

b5: output 2.1.4: Please clarify why replication is to be explored in only two islands. Given the project's budget and solid baseline, a stronger replication/scaling plan should be embedded and the objective should be to initiate replication in at least two islands and delivering a solid plan for replication in a larger set of islands.

## Agency's Comments

Agency's Comments: 10/20/2025

**a1.** ToC narrative fully rewritten to explain each causal pathway from barriers to outcomes, structured under four transformation pathways (Governance Integration, Landscape Restoration, Biodiversity-Compatible Production, and Sustainable Finance). Each pathway now details how interventions combine to achieve durable change, supported by adaptive governance and feedback mechanisms. Added explicit discussion of scaling, durability, and external actions needed for replication through the national Blue-Green Islands mechanism.

A new paragraph identifies **five impact drivers** (institutional embedding, local finance loops, governance alliances, evidence systems, and social legitimacy) that sustain results beyond project life.

Supporting references drawn from STAP *Taking Nature-Based Solutions to Scale* and GEF-8 IP Guidance integrated into design logic. National OECM and MPA Network reforms incorporated into the ToC narrative under the Governance Integration and Landscape/Seascape pathways, showing how ISLAS contributes to ongoing PBSAP 2024-2040 and E-NIPAS implementation. This clarifies the project's link to current national conservation systems and strengthens the causal logic for policy feedback and scaling.

**OECMs** ? current efforts of PH government are focused on identifying potential sites and integrating OECMs into national conservation strategies (i.e., Philippine Biodiversity Strategy and Action Plan (PBSAP) 2024-2040, which explicitly includes OECM identification as a key strategy to help the country achieve its conservation targets). The DENR is drafting guidelines to recognize OECMs to support its 30x30 commitments. While these guidelines will be anchored on existing frameworks such as E-NIPAS, it will also recognize contributions of Indigenous Peoples to conservation in line with the Indigenous Peoples Rights Act (IPRA).

**MPA Network** ? E-NIPAS, which provides for a stronger legal foundation for establishing and managing protected areas including MPAs, allows for the integration of community-based and co-managed MPAs into the national system. Additionally, the government promotes the development of MPA networks through inter-institutional collaboration among neighboring local government units at the community/barangay up to provincial levels. LGUs are increasingly forming alliances and establishing Memorandums of Agreement to manage MPA networks that span multiple jurisdictions such as the Verde Island Passage and the Batangas MPA Network.

**a2.** The ToC narrative has been rewritten accordingly.

**b1.** Updated to reflect that **no ICCAs/LCAs are currently programmed** in target islands. Output 1.1.2 now focuses on **identification, documentation (mapping, governance/ecological validation), FPIC/community resolutions, local plan/ordinance mainstreaming, and submission to DENR/BMB** for potential OECM recognition. **Core Indicator accounting** marked as **contextual/provisional** at PIF, with hectares to be finalized at PPG.

**b2.** Clarified that ?community protocols for benefit sharing? refer to locally developed rules for fair, transparent sharing of livelihood or enterprise benefits within participating communities?not Access and Benefit Sharing under the Nagoya Protocol. No ABS/Nagoya activities are included, and therefore BD-2-2 funding codes are not applicable. The output

narrative was revised to emphasize social-equity mechanisms within stewardship agreements rather than genetic-resource access. Text in Section B.2 and the portal has been updated accordingly to prevent confusion.

**b3.** Output 2.1.2 broadened to identify **societal challenges** (water security, fisheries, DRR, food security, erosion, tourism capacity) and to **embed quantitative targets** for these outcomes alongside biodiversity targets directly in **stewardship agreements and performance-based grants**.

**b4.** Clarified that Output 2.1.2 provides performance-based grants tied to verified NbS outcomes, while Output 2.1.3 establishes and strengthens the small-grant systems and national modalities (UNDP LVG, BMB BDFE, FMB CBFM) that enable community participation, transparency, and sustained stewardship.

**b5.** Revised Output 2.1.4 to "initiate and document replication" rather than "explore." Replication will begin in at least two candidate island clusters (Romblon and Dinagat, to be confirmed at PPG) and feed into a national scaling plan through the BMB Blue-Green Islands and BIOFIN mechanisms for broader rollout.

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Agency's Comments: 23/Jan/2026

**a1.1 and a1.2 ? Theory of Change (Causal Pathways, Components, and Livelihood Assumptions):**

Thank you for these comments. The Theory of Change narrative has been revised to clarify the relationship between the three causal pathways and the project's Components, and to refine the framing of the third pathway in line with STAP guidance. A short orienting paragraph was added at the start of the ToC section to explicitly explain how the causal pathways operate across the Components, rather than mapping one-to-one or sequentially, and to clarify that Component 3 plays a cross-cutting role in learning, adaptive management, and scaling.

**a1.2.** In response to the second comment, the third causal pathway has been revised and retitled to emphasize **restoration and stewardship outcomes**, reflecting that the core interventions focus on protected areas, OECMs, estate expansion, and improved management effectiveness, with restoration applied selectively where ecologically appropriate. The revised text no longer implies that restoration or livelihoods are the primary drivers of biodiversity outcomes. Consistent with STAP guidance on alternative livelihoods, livelihood support is now explicitly framed as **conditional and biodiversity-compatible**, designed to reinforce agreed conservation rules and stewardship arrangements rather than assumed to deliver biodiversity benefits on its own. The ToC now clearly identifies the underlying assumptions linking livelihood support to reduced pressure on sensitive ecosystems, and positions these assumptions as testable through project monitoring, learning, and adaptive management. This revision ensures that livelihoods are treated as enabling incentives within a conservation-led strategy, and that the project contributes to the evidence base on when and how such approaches support global environmental benefits.

**a1.3** The "Scaling Deep ? Behavioral Change?" bullet has been revised to explicitly anchor references to "community protocols" and "education" to existing project outputs. Community protocols are now clearly framed as locally agreed rules formalized through OECM recognition and stewardship agreements under Component 1, while "education" refers to targeted capacity building and learning integrated into governance and co-management processes under Components 1 and 3. Gender-responsive participation remains explicitly linked to Output 2.2.3. This revision avoids introducing standalone activities and clarifies traceability within the Results Framework.

#### **a1.4 ? Enforcement gap in the Theory of Change:**

Thank you for this comment. The ToC narrative has been revised within the **Governance Integration** pathway to explicitly clarify how the barrier of weak enforcement of environmental laws is addressed through institutional and governance mechanisms. The revised text explains that enforcement is strengthened by clarifying rules and jurisdictions through updated ordinances and zoning, formalizing stewardship arrangements under PA and OECM recognition, improving coordination among LGUs and multi-stakeholder management bodies, and securing more predictable financing for monitoring and compliance functions. This makes explicit how governance reforms enhance enforcement effectiveness within existing legal mandates, without introducing new enforcement authorities.

**B4** The ToC narrative has been revised to clarify the sequential logic of financing instruments, with grant-based support used initially to establish enabling conditions and reduce risk, followed by performance-based and potentially blended financing approaches as site readiness and market conditions allow.

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Agency's Comments: 30/Jan/2026:

Agreed. The causal pathway title has been revised accordingly to reflect intervention logic rather than outcomes.

#### **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

JS 1/7/2026 - Cleared.

JS 9/25/2025 - Please see comments on the baseline and better justify the project's increment compared to baseline projects. A stronger strategy for replication/scaling is also necessary to justify the increment.

Agency's Comments

Section A.5 completely revised to clarify the baseline versus GEF alternative in accordance with GEF/C.31/12. The text now (i) describes ongoing and committed national programs as the baseline, (ii) uses the co-financing envelope (USD 42 million) only as a proxy for those expenditures expected without the GEF grant, and (iii) specifies the incremental USD 5.3 million investment and its replication rationale through the Blue and Green Islands Framework.

#### **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

JS 1/26/2026 - Cleared.

JS 1/7/2026

b - The intention of the Agency to explore potential execution support during PPG is well noted. However, at this PIF stage, please remove "Potential exceptional execution support, with full separation of oversight and execution functions will be explored as an exception during the PPG phase, with prior discussion with the GEF Program Manager in advance of the CEO Endorsement Request Submission, in line with the exceptional execution support being requested also for other GEF/GBFF projects being reviewed for endorsement with the same IP in the Philippines" and the "Yes" answer.

As per guidelines, execution support will be discussed during PPG based on the set criteria for exceptions to the separation rule.

The rest is cleared.

JS 9/25/2025 -

b- It is noted that the IA does not plan to play an execution role. Please remove "Potential exceptional execution support, with full separation of oversight and execution functions will be explored as an exception during the PPG phase, with prior discussion with the GEF Program Manager in advance of the CEO Endorsement Request Submission" from the portal entry.

c- Please see the list of GEF-7, GEF-8 and GBFF baseline projects listed in a previous comment box and revise accordingly in this section.

## Agency's Comments

Agency's Comments: 10/20/2025

**b.** It has been clarified by ticking the Yes Box that potential exceptional execution support, with full separation of oversight and execution functions will be explored as an exception during the PPG phase, with prior discussion with the GEF Program Manager in advance of the CEO Endorsement Request Submission, in line with the exceptional execution support being requested also for other GEF/GBFF projects being reviewed for endorsement with the same IP in the Philippines.

**c.** Section 5.3 updated to **cross-reference the baseline projects** listed in Section B.2 (GEF-7, GEF-8, and GBFF) to ensure consistency and visibility of institutional linkages. Text now specifies **coordination and knowledge exchange mechanisms** with UNEP (GEF-7 10386), ADB (10431, 11589), IADB (11041), and UNDP (11600, 11250 BGI IP), highlighting how ISLAS will **leverage governance and finance lessons** rather than duplicate efforts.

In the PIF, narrative updated to state that all nine are **GEF-financed initiatives** (across GEF-4?GEF-8/GBFF) implemented by **UNEP, ADB, IDB, and UNDP**. Section A lists them; the Coordination section now **cross-references** those entries and specifies **DENR?FASPS** as the platform for quarterly coordination, lesson sharing, indicator harmonization, and sequenced scale-up to avoid duplication.

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Agency's Comments: 23/Jan/2026

b. Thank you for this clarification. The reference to potential exceptional execution support has been **removed from the PIF**, and the corresponding response has been revised accordingly and the Yes box has been unticked. In line with GEF guidelines, any consideration of exceptional execution support will be addressed, if applicable, **during the PPG phase**, based on the established criteria and following the required discussions with the GEF Secretariat.

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

JS 3/9/2026 - Cleared.

JS 1/26/2026

a3- This comment has not been addressed since there is still no target under CI 5 in the portal entry. Please report the surface area already reported under 5.3 under 5 as well:

Indicator 5 Area of marine habitat under improved practices to benefit biodiversity (excluding protected areas) ⓘ			
Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)

JS 1/7/2026

a3- This comment has not been addressed since there is still no target under CI 5. If the areas targeted are marine OECMs or are to be recognized as marine OECMS thanks to the project, please report on the surface area already reported under 5.3 under 5 as well:

Indicator 5 Area of marine habitat under improved practices to benefit biodiversity (excluding protected areas) ⓘ			
Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)

a4- This comment has not been addressed. If terrestrial OECMs are targeted by this project, please report them under 4.5, in addition to reporting their surface areas under 4.1:

**Indicator 4.5 Terrestrial OECMs supported** ⓘ

Name of the OECMs	WDPA-ID	Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
Documents (Please upload document(s) that justifies the HCVF)					
Title			Submitted		

b1- Please see comment on cost-effectiveness in first comment box.

The rest is cleared

JS 9/25/2025

a1- Please clarify why there is no WDPA ID for Panaon Island LMMAs and confirm that steps would be taken to register them as part of PPG or project implementation.

a2-Core indicator 3: Please clarify if restoration reported under these targets is in areas already reported under core indicator 1. If so, please remove the corresponding surface area under 3 but keep a project-specific target, which will be included in the project results-framework at CEO endorsement stage, to capture all restoration activities, including in PAs.

a3 - Core indicator 5.3 is a contextual indicator. It means that all surface area under 5.3 should also be reported under 5:

**Indicator 5 Area of marine habitat under improved practices to benefit biodiversity (excluding protected areas)** ⓘ

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)

a4- The projects plans to work on OECM designation but there are not targets on core indicator 4.5. Please explain or revise. Please note that 4.5 is a contextual subindicator, i.e. all surface area included under 4.5 should also be included in one of the component subindicators 4.1, 4.2, 4.3 or 4.4.

b1- The project's project impact is over a total of less than 19,000 hectares for a total funding request of \$6,000,000. The cost efficiency in terms of GEBs is thus very low. Please revise the targets significantly upward.

b2- The project objective is to "To expand the biodiversity conservation estate" but there is no protected area creation planned and less than 400 ha of marine OECM are reported, and it is not clear if these would be new OECM designation. Please include interventions and targets that are in line with the project objective.

## Agency's Comments

Agency's Comments: 10/20/2025

**a1.** Section B.2 and Core Indicator notes revised to reflect the **official declaration of the 62,478 ha Panaon Island Protected Seascape (RA 12238, 2025)**. The 19 LMMAs (? 525 ha) are nested within this Seascape and no longer counted separately. Project will assist DENR-BMB with WDPA submission during PPG and early implementation.

**Panaon Island LMMA** has been formally designated as the **Panaon Island Protected Seascape (PIPS)**, declared under Republic Act 12238 on 29 August 2025. This official designation under a national law is a critical step for obtaining a WDPA ID. The registration process is as follows:

1. National declaration and reporting ? done thru RA 12238
2. Data submission to UNEP-WCMC ? DENR-BMB submits necessary information (e.g., GIS data, designation details, governance structure, management plan, etc)
3. Review and validation ? UNEP-WCMC reviews and validates the submitted data for accuracy and compliance with WDPA standards
4. Publication and WDPA ID assignment ? once validated, the new protected area is published in the WDPA and assigned a unique WDPA ID. This is the final step, and it can take several months after national legislation is passed.

**a2.** CI-1 confirmed at **11,963 ha** (Marinduque 9,760; MTHH 2,203). Any restoration **inside these PAs** will be reported via **CI-1/METT** and **excluded from CI-3**. Final overlap split will be confirmed at **PPG via GIS overlay** (no double counting).

**a3.** Clarified that **CI-5 (399 ha)** already encompasses coral reef, seagrass, and mangrove habitats, consistent with **GEF-8 sub-indicator guidance (5.1?5.3)**. The total is reported once under CI-5, with sub-habitat breakdowns used only qualitatively in the Results Framework narrative. Final reef, seagrass, and mangrove figures will be confirmed during **PPG baseline assessments** for the three ISLAS sites

**a4.** Clarified that **OECM-related areas (? 4,000 ha of CBFMAs)** are **fully included under CI-4.1/4.2 (landscapes under improved practices)**, with **CI-4.5** treated solely as a **contextual sub-indicator** to identify sites advancing toward formal **OECM recognition** under DENR?BMB guidelines. No separate area total is reported for CI-4.5. The relationship between CI-4 and CI-4.5 is now explained in the portal narrative and cross-referenced in **Section B**.

**b1.** Following GEFSEC guidance, the project?s GEB area has been recalculated to include the newly declared **Panaon Island Protected Seascape (62,478 ha, RA 12238 of 2025)**, adjacent **CBFMAs (? 4,000 ha)**, and confirmed terrestrial and marine management units in **Marinduque** and **Camiguin**. These updates raise the total non-overlapping area under improved management from ? 16,887 ha to > 60,000 ha (PPG GIS to confirm, potential 74k ha), improving preliminary cost efficiency from ? US \$314/ha to ? US \$88/ha ? within the typical **GEF-8 small-island benchmark (US \$60?120/ha)**.

During the **PPG**, the team will verify final polygons through GIS overlay and refine Core Indicator totals to ensure accuracy and avoid double counting. The revised scale, combined with the national replication pathway through **DENR?BMB?s Blue and Green Islands Framework**, demonstrates strong cost-effectiveness and GEB return relative to comparable SIDS projects.

**b2.** Objective retained and operationalized for small-island contexts. Estate expansion will occur **through legal recognition and consolidation**, not new terrestrial PA creation:

? **OECM designation outside PAs:** Identify, document, and submit ? **4,000 ha of CBFMAs** for **formal OECM recognition** under DENR?BMB (tracked contextually as **CI-4.5**, with hectares fully included under **CI-4.1/4.2** to avoid double counting).

? **Seascape registration:** Support **WDPA registration of the Panaon Island Protected Seascape (62,478 ha; RA 12238)** during PPG/early implementation, consolidating marine estate at national and global registry levels.

? **By-law instruments:** Establish/strengthen **no-take/seasonal closures** in community-managed marine zones to secure additional conservation coverage and durability.

**Targets:** By CEO Endorsement/early implementation, submit ? **3,500?4,000 ha** for **OECM designation** (outside PA boundaries) and complete **WDPA submission** for PIPS; CI tables updated to reflect OECM as **contextual (4.5)** nested under **CI-4**, with **CI-2** capturing the full PIPS area.

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Agency's Comments: 23/Jan/2026

**a3.** Thank you for this clarification. The statement, *?This total (399 ha) aggregates coral reef, seagrass, and mangrove habitats in accordance with the GEF-8 Core Indicator 5 sub-indicator framework (5.1?5.3); these sub-habitats are reported contextually within CI-5 only and not as separate area totals,?* has been corrected to read: *?The reported total (399 ha) corresponds to marine areas governed as OECMs and is reported under both CI 5 (Area of marine habitat under improved practices) and CI 5.4 (Marine OECMs supported), consistent with the structure of the GEF-8 Results Measurement Framework. Habitat types (coral reefs, seagrass beds, and mangroves) are provided for contextual description and do not represent separate additive area totals.?*

**a4.** Thank you for this comment. Changes have been made to the Core Indicator description to explicitly report terrestrial areas strengthened toward OECM recognition under CI 4.5, and the corresponding entries in the GEF-8 Results Measurement Framework have been updated accordingly, consistent with the Guidelines on the Implementation of the GEF-8 Results Measurement Framework (2022).

Both changes are reflected in the PIF and the GEF Core Indicator Spreadsheet.

**b1 ? Cost-effectiveness:**

As requested, cost-effectiveness considerations raised in the first comment box have been explicitly addressed in the **?Enabling Baseline Conditions and Project Approach?** section, which now articulates the rationale for the project?s scale, sequencing of interventions, and cost-effectiveness of the chosen design.

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Agency's Comments: 30/Jan/2026:

It has been updated in the portal, with apologies.

Indicator 5 Area of marine habitat under improved practices to benefit biodiversity (excluding protected areas) <span>o</span>			
Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)
<input type="text" value="399.00"/>			

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

Secretariat's CommentsNA

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

JS 3/20/2026 - Cleared.

JS 3/19/2026 -

4- Under the key risk table, please explain how the overall risk rating was identified. Please provide explanation of risk and mitigation measures.

JS 9/25/2025

- 1- Environmental and Social risk: Please explain what LVG means. Please also consider reformulating "Social risks will not be considerable as there are no IPs in the priority islands" as there can be significant social risks irrespective of the presence of IPs and the risk is rated as "substantial".
- 2- Fiduciary risks: Please remove all reference to UNDP execution support. As the agency knows, IA and EA roles are meant to be separate and any potential execution support will have to be discussed during project preparation.
- 3- Please reformulate the first sentence of the elaboration of the risk category "Other" to make clear to which risk(s) this elaboration speaks to.
- 4- Please explain how the overall risk was identified.

Agency's Comments

1. Clarified that **LVG = Low-Value Grant** (see Output 2.1.3); corrected risk section to avoid confusion with LGUs and defined low-value grants on first mention. Removed the "no IPs = low risk?" phrasing. Social risk is **rated Substantial provisionally** at PIF due to uncertainty pending PPG consultations/assessments. Text now states that risks may occur **regardless of IP presence** and commits to **IPs screening and FPIC where applicable**, plus preparation/implementation of **SEP, ESMF, GAAP, and GRM** during PPG. Timeline aligned with the Initiation Plan (engagements start **Jan 2026** after Dec 2025 PIF approval).

**IP presence** - The island province of Camiguin is home to the Kamigin ICCs/IPs, an indigenous group with an ancestral domain covering approximately 1,006 hectares across the municipalities of Mambajao and Sagay. The Kamigin are a subgroup of the Manobo ICCs/IPs. Their identity was officially recognized by the NCIP through Resolution No. 08-22-2019 dated 19 December 2019, which included them among the 110 officially recognized ICCs/IPs in the

Philippines. Currently, there are around 15,000 IPs residing in Camiguin. However, in 2023, the Provincial Government of Camiguin passed a resolution denying the existence of indigenous groups in the province since time immemorial. Local officials cited the absence of historical records to support the presence of IP communities—an assertion that contradicts research conducted by the National Commission for Culture and the Arts (NCCA). This lack of local recognition reportedly prevents Kamigin tribal members from accessing vital government assistance programs.

2. Refocused fiduciary risk on the **Executing Partner (DENR/BMB)** and sub-recipients (LGUs/CSOs, LVGs). Key risks: misallocation/ineligible expenditures, procurement delays/irregularities, weak segregation of duties, late financial reporting, and small-grant misuse. Mitigation: The PPG will explore and discuss with the GEF Secretariat prior to CEO ER submission potential exception for execution support for Funds will flow under NIM with UNDP Direct Payment applied for high-risk categorie; PPG micro-assessment and capacity **plan**; a project **Financial Management Manual** aligned with RA 9184 and GEF/UNDP requirements; approved **Procurement Plan** with prior-review thresholds and bid committees; **milestone-based LVG SOPs** (standard grant agreements, tranche releases on verified outputs); quarterly IFRs and **bank reconciliations; spot checks and annual audit** (COA/independent acceptable to UNDP); **asset registry & physical verification**; conflict-of-interest declarations; and functioning **GRM/whistleblower** channels.

3. Reformulated the "Other" risk to explicitly cover **macroeconomic/market risks to sustainable financing**, clarified expected **low/moderate** impact during recovery, and added **PPG private-sector consultations** as mitigation.

4. The **overall risk rating** was identified using **UNDP's Social and Environmental Standards (SES) Screening Procedure**, required at PIF stage by UNDP policy, which assesses component-level environmental, social, and fiduciary risks and then determines the **highest applicable category** (in this case "Substantial") as the overall project risk. The rating reflects **uncertainty at PIF stage**—limited site-level data and stakeholder engagement—not confirmed high risk. Text updated to explicitly describe the **screening process** and rationale for the aggregate rating. An updated SESP will be provided at CEO Endorsement stage following additional screening at PPG stage.

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26 March 2026:

The following entry has been added to the risk table (Overall risk rating):

"The overall risk rating of Substantial was derived from the assessment of climate, environmental and social, and technological risks, reflecting uncertainties related to site-specific conditions, stakeholder dynamics, and the application of innovative approaches.

Risks associated with climate vulnerability of project sites, potential environmental and social impacts, and challenges associated with implementing innovative and participatory approaches will be assessed in more detail during the PPG phase, including site selection screening, stakeholder consultations, and capacity analyses. The project will apply established safeguards instruments (e.g., ESMF, SEP, IPPF, GAAP) and adopt adaptive, participatory design approaches to ensure stakeholder buy-in and minimize adverse impacts. Additional measures include capacity building, robust financial and fiduciary controls, and flexibility in site selection and implementation modalities."

## 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

JS 1/7/2026 - Cleared.

JS 9/25/2025

b) Please see comments in a earlier comment box on insufficient strategy for scaling-up.

The rest is cleared.

Agency's Comments Scaling strategy strengthened and cross-referenced across the document. **Section B.2** now operationalizes scaling via three standardized modules: (i) **governance** (inter-LGU alliances, OECM pathway), (ii) **finance** (BIOFIN/PENCAS budgeting, **reef insurance**, PES), and (iii) **NbS technical packages** (reef no-take/closures, mangrove ANR, agroforestry). **Outcome 2.1/2.2** define island demonstration models and a replication approach; **Outputs 2.2.x** specify finance instruments and adoption milestones. **Section A.5 (Incremental Reasoning)** ties replication to cost-effectiveness and GEBs. The **Coordination** section anchors scaling through **DENR-FASPS** quarterly platform and the **Blue & Green Islands (BGI) framework** for uptake beyond the three sites. The **Theory of Change** was updated with explicit assumptions/risks for replication and a PPG task to finalize the replication pipeline (targets: additional islands/LGUs adopting modules, policy/budget instruments issued).

#### 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

JS 1/7/2026 - Cleared.

JS 9/25/2025

- Please elaborate on alignment with *BD-3-2 Implementation of domestic resource mobilization/biodiversity finance plans* given related activities under component 2, and with *BD-2-2 Implementation of the Nagoya Protocol on Access and Benefit Sharing* given the anticipated activities on community protocols and ABS (output 1.2.2).

Agency's Comments Alignment made explicit in the **Alignment with GEF-8 Biodiversity programming** narrative. **BD-3-2 (Domestic resource mobilization/biodiversity finance)** is supported under **Component 2** via PENCAS/NCA integration in LGU budgeting, BIOFIN budget tagging/expenditure reviews, and pilots for reef insurance, PES, and eco-tourism reinvestment, with adoption milestones for scaling. **BD-2-2 (Nagoya/ABS):** Output **1.2.2** clarifies activities are **community benefit-sharing/equity protocols** and **do not involve access to genetic resources or ABS permitting**; therefore we **do not claim BD-2-2 results** and have adjusted portal text accordingly. Portal tagging: **BD-3-2 = Yes** (justification entered); **BD-2-2 = No (not applicable)** with explanatory note.

**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 JS 9/25/2025 - Cleared.

Agency's Comments

**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

JS 1/7/2026 - Cleared.

JS 9/25/2025 -

1: Please review the numbers associated with the KMGBF targets as they are incorrect for most, e.g. restoration is target 2:

At the global level, the project contributes to the **Kunming-Montreal Global Biodiversity Framework (GBF)** through:

- **Target 3:** Improved management and recognition of protected and conserved areas (Outputs 1.1.1, 1.1.2, 1.1.3, 1.2.1, 1.2.2, 2.1.2, 2.2.1, 2.2.2).
- **Target 7:** Restoration of degraded ecosystems and maintenance of ecosystem services (Outputs 2.1.2, 2.1.3).
- **Target 13:** Mobilization of sustainable biodiversity finance (Outputs 2.2.1, 2.2.2, 2.2.3).
- **Target 17:** Inclusive and participatory conservation by Indigenous Peoples, women, youth, and local communities (cross-cutting, all outputs). Notably, the project takes an ambitious approach to Target 17 by requiring women's participation in leadership and equity positions across NbS financing mechanisms, advancing inclusive governance beyond consultation toward structural decision-making power.

3) For each KMGBF target, please explain how the project contributes to its achievement in qualitative and, whenever possible, quantitative terms (e.g. using targets on GEF core indicator or in the project-specific indicators anticipated to be in the project's results framework).

4) Please explain why KMGBF targets 1 and 8 are not mentioned.

5) Please explain why Targets 22 and 23 of the KMGBF are not mentioned, as the project should aim to ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making as well as integrate gender responsive approaches throughout the project activities.

Agency's Comments

1-5: Thank you. The GBF target numbering has been revised- and explanations included accordingly under section C- **ALIGNMENT WITH GEF-8 PROGRAMMING STRATEGIES AND COUNTRY/REGIONAL PRIORITIES.**

**7 D. Policy Requirements**

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

Secretariat's Comments

JS 9/25/2025 - Cleared.

#### Agency's Comments

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

#### Secretariat's Comments

JS 1/26/2026 - Cleared.

JS 1/7/2026 -

2- Response and edits well noted. However, the limited engagement with IPLCs does not seem to be restricted to some sites. In the table provided in the portal entry only one CSO (Philippine Rural Reconstruction Movement) appears to have been consulted across the indigenous peoples, local communities, civil society organizations or women and youth groups. Please consider conducting targeted consultations given the time available before the next WP or thoroughly justify why it is not possible at this stage of project development.

The rest is cleared.

JS 9/25/2025

1- Please explain why the latest consultation reported dates back from December 2024 when the project was submitted in September 2025.

2- In addition, it is unclear which indigenous peoples, local communities, civil society organizations or women and youth groups have been engaged and consulted during project design stage. While the stakeholder engagement section shows 'Yes' for Indigenous Peoples and Local Communities (IPLCs) consulted during project identification phase, consultations with Indigenous Peoples and Local Communities are not a part of the list of consultations. Please elaborate further about stakeholder consultations during project identification phase, including with IPLCs, and highlight specific project measures to engage and consult these important stakeholders in project development. Please notably consider integrating further engagement with IPLCs regarding Nature-based Solution (NbS) based on their traditional and local knowledge.

#### Agency's Comments

Agency's Comments: 10/20/2025

1. Records currently available cover site consultations through Dec 2024; national level consultations, i.e., discussion exchanges with the Implementing Partner were completed in June 2025 as part of PIF validating and completion.

2. Clarified identification-phase engagement and set a concrete plan for PPG. During PIF development, consultations were held with **DENR/BMB** and **LGUs**; in **Marinduque**, sessions included **People's Organizations (POs)** and **NGOs**. We acknowledge that **direct IPLC consultations were limited/incomplete** at identification for **Camiguin and Siquijor**. Section 7.2 now (i) lists the stakeholders consulted to date and (ii) commits to **targeted PPG engagement with IPLCs, CSOs, women's and youth groups**, including **NbS co-design drawing on traditional/local knowledge**, coordination with **NCIP**, and **FPIC where applicable**. The PPG Initiation Plan schedules these engagements early in PPG.

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Agency's Comments: 23/Jan/2026

2. Comprehensive IPLC stakeholder consultations have been programmed for the PPG phase in line with the need to identify area-based specific interventions within the target islands. Among the three Project sites, Camiguin Island is the only Project site with Indigenous Peoples (IP) communities. To ensure that this Project aligns with the national level targets concerning the Indigenous Peoples, the initial project design was presented to the Chairperson and different technical Bureaus of the National Commission on Indigenous Peoples (NCIP) during the UNDP-NCIP Coordination meetings held last October 3, 2025 and January 8, 2026. NCIP affirmed their support to the Project as it would improve the communities' capacities to adapt to climate change and biodiversity threats. Comprehensive IPLC stakeholder consultations have been programmed for the PPG phase in line with the need to identify area-based specific interventions within the target islands. Among the three Project sites, Camiguin Island is the only Project site with Indigenous Peoples (IP) communities. To ensure that this Project aligns with the national level targets concerning the Indigenous Peoples, the initial project design was presented to the Chairperson and different technical Bureaus of the National Commission on Indigenous Peoples (NCIP) during the UNDP-NCIP Coordination meetings held last October 3, 2025 and January 8, 2026. NCIP affirmed their support to the Project as it would improve the communities' capacities to adapt to climate change and biodiversity threats.

## 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 Cleared.

Agency's Comments

**Focal Area allocation?**

Secretariat's Comments

JS 1/7/2026 - Cleared.

JS 9/25/2025

In line with previous comments, please program part of the resources on the following entry points:

BD-3-2 Implementation of domestic resource mobilization/biodiversity finance plans

BD-2-2 Implementation of the Nagoya Protocol on Access and Benefit Sharing

Agency's Comments **There are no ABS/Nagoya activities in this project.** Output 1.2.2 refers to **local, project-derived socio-economic benefits**, not access to genetic resources or

ABS procedures. Accordingly, **no BD-2-2 allocation** is programmed. A portion of **Component 2** is programmed under **BD-3-2** to reflect domestic biodiversity-finance pilots (LGU budgeting, eco-tourism reinvestment, PES/reef-insurance) with **BIOFIN**.

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

Secretariat's Comments

Agency's Comments

**SCCF A (SIDS)?**

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

Agency's Comments

**Focal Area Set Aside?**

Secretariat's Comments

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 CommentsCleared.

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 CommentsCleared.

Agency's Comments

**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 CommentsJS 9/12/2025 - Cleared

Agency's Comments

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

Secretariat's CommentsJS 9/12/2025 - Cleared

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 CommentsJS 9/12/2025 - Cleared

Agency's Comments

**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 CommentsNA

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 CommentsCleared.

Agency's Comments

**Annex D: Safeguards Screen and Rating**

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

Secretariat's Comments

JS 1/26/2026 - Cleared.

JS 9/29/2025- We note that UNDP attached the Environmental and Social Screening Procedure (SESP), and an overall ESS risk is classified as high/substantial. Both the environmental and social risks will be further screened, assessed, and mitigated following the UNDP Social and Environmental Standards, during the PPG Phase. An ESMF, IPPF, SEP, and GAAP should be prepared during the PPG stage which will be executed and updated, as necessary, during implementation.

Please see comment on consultations with IPLCs in the comment box related to consultation during PIF formulation.

### Agency's Comments

1. The preliminary **SESP** has been uploaded to the portal; the overall **Substantial** risk rating is retained as a provisional PIF-stage classification. During **PPG**, the project will prepare, consult on, and disclose the full suite of instruments consistent with **UNDP SES**: an **ESMF** (including screening forms, an exclusion list, subproject ESMP templates, chance-find procedures, and a Process Framework if any access/use restrictions are envisaged), an **IPPF** (if Indigenous Peoples are present/affected, with **FPIC** where applicable and in coordination with **NCIP**), an updated **SESP** (with project-level **GRM** aligned to UNDP's SRM), and a **GAAP**. Drafts will be produced early in PPG, consulted (in locally appropriate languages) in the three islands, and **finalized prior to CEO Endorsement**; instruments will be **updated during implementation** as needed. All community-level activities will undergo E&S screening under the ESMF, with proportionate ESMPs or activity-specific plans prepared where required.

2, Cross-referenced Section 7.2. Identification-phase consultations documented (BMB/LGUs; PRRM; POs in Marinduque). We acknowledge limited IPLC consultations during PIF and commit to **early-PPG, NCIP-coordinated IPLC engagement** (with **FPIC** as applicable) and **NbS co-design using traditional/local knowledge**; outputs to be reflected in **SEP/ESMF/GAAP** and the portal.

### Annex E: Rio Markers

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

### Secretariat's Comments

JS 1/26/2026 - Cleared.

JS 9/25/2025 Given the projects plans to support NBS for climate mitigation and adaption, please consider tagging CCM 1 and CCA 1.

Agency's Comments **Rio markers updated: BD = 2 (Principal); CCM = 1 (Significant) and CCA = 1 (Significant)** reflecting NbS for mitigation (**CI-6 ? 125,520 tCO<sub>2</sub>e**) and adaptation (EbA in CLUP/FLUP and Component 2).

### Annex F: Taxonomy Worksheet

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

Secretariat's CommentsCleared.

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 CommentsNA

Agency's Comments

**9 GEFSEC Decision**

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

Secretariat's Comments

JS 3/20/2026- The project is recommended for clearance.

JS 3/19/2026 - Not at this stage. Please address the remaining comment (risk table) included in this review sheet and resubmit.

JS 3/9/2026 - Not at this stage. Please address the two remaining comments included in this review sheet and resubmit.

JS 9/25/2025- Not at this stage. Please address comments included in this review sheet and resubmit. For any clarification please contact jsapijanskas@thegef.org

Agency's Comments

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

Secretariat's Comments

During PPG:

1 - For Outcome 2.2, please ensure the CEO endorsement request is clear on the financial mechanisms to be supported, including relevant baseline data, targeted payers/contributors,

beneficiaries, institution anticipated for management and an explanation of links to biodiversity outcomes. For PES, please refer to STAP's guidance and ensure the CEO endorsement request demonstrates that the preconditions for a PES are met in the targeted sites: <https://www.stagef.org/resources/report/payments-environmental-services-and-global-environment-facility>

2- Once the gender analysis has been conducted and the Gender Action Plan developed, the Agency is requested to incorporate the findings and identified actions/interventions in the GAP in the project components, outputs and activities. The agency is also requested to provide some indicative budget for the Gender Action Plan and related gender-specific activities/outputs. Under M&E, please reflect that the reports submitted (MTR and TE) will include gender-specific results and progress in the implementation of the Gender Action Plan.

3- Please consider increasing the scale of impact of the project as measured on GEF core indicators to improve cost-effectiveness. This includes, as promised in the PIF, to better leverage GEF funding by pursuing blended mechanisms, where viable, for revenue-generating NbS to be supported by the project.

4- In the development of the project's Results Framework, please draw as relevant and adapt as necessary from the KMGBF monitoring framework, including binary, headline, component and complementary indicators, to measure the project's contribution to the implementation of KMGBF goals and targets. Please see Annexes of <https://www.cbd.int/doc/decisions/cop-16/cop-16-dec-31-en.pdf> and methodological guidance <https://www.cbd.int/doc/c/ea34/8414/8c5e6797d291af15f33d6e40/cop-16-inf-03-rev1-en.pdf>

5- Please develop a comprehensive Theory of Change for scaling, in addition to the ToC for the project overall.

6- Please make plans for the projects to support the registration of targeted OECMs in the WPDA database.

## Agency's Comments

1. The Outcome 2.2 narrative and Results Framework will be expanded at **CEO Endorsement** to specify:

? **Financial mechanisms supported:** biodiversity-linked LGU budgeting, eco-tourism reinvestment, and Payment for Ecosystem Services (PES) pilots.

? **Baseline data:** existing LGU environment funds and BIOFIN assessments.

? **Payers/contributors:** LGUs, private tourism operators, and local resource users;

**beneficiaries:** community conservation groups and PA/OECM managers; **fund managers:** LGU or trust fund accounts under BMB oversight.

PES activities will follow **STAP's guidance** and confirm preconditions (defined services, willing buyers/sellers, institutional capacity, monitoring). The CEO ER will document these elements and trace their link to **biodiversity outcomes** (e.g., improved management effectiveness, CII/5).

2. Commitment noted. During the **PPG phase**, a full **Gender Analysis** will be undertaken, and a **Gender Action Plan (GAP)** will be prepared in line with the **UNDP Gender Equality Strategy**. At **CEO Endorsement**, the GAP findings will be **integrated across project components, outputs, and activities**, with a dedicated **indicative budget** for gender-responsive actions (e.g., leadership training, women's livelihood support, participation in decision-making).

Under **M&E**, both the **Midterm Review (MTR)** and **Terminal Evaluation (TE)** will explicitly report on **gender-disaggregated results** and progress in GAP implementation, as highlighted in the indicative project overview. Further, as per UNDP Policy, 15% of the resources of the project's budget will be allocated to advance gender equality and women's empowerment.

**Review Dates**

	<b>PIF Review</b>	<b>Agency Response</b>
<b>First Review</b>	<b>9/25/2025</b>	<b>10/20/2025</b>
<b>Additional Review (as necessary)</b>	<b>1/7/2026</b>	<b>1/23/2026</b>
<b>Additional Review (as necessary)</b>	<b>1/26/2026</b>	<b>1/30/2026</b>
<b>Additional Review (as necessary)</b>	<b>3/9/2026</b>	<b>3/17/2026</b>
<b>Additional Review (as necessary)</b>	<b>3/17/2026</b>	<b>3/26/2026</b>