



Sustainable management of fisheries, marine living resources and their habitats in the Bay of Bengal region for the benefit of coastal states and communities.

Edit and Submit CEO Endorsement

Basic project information

GEF ID

10451

Countries

Regional

Project Name

Sustainable management of fisheries, marine living resources and their habitats in the Bay of Bengal region for the benefit of coastal states and communities.

Agencies

FAO

Date received by PM

12/19/2019

Review completed by PM

Program Manager

Steffen Hansen

Focal Area

Multi Focal Area

Project Type

FSP

PIF
CEO Endorsement

Project Design and Financing

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

Secretariat comment at CEO Endorsement Request

(LKarrer Feb 13, 2020) There have been several significant changes from the PFD, which have not been justified. Most notably, there are major reductions in co-financing, outcome 3.1 is completely absent, the EA responsibilities have changed, and the CO2 targets increased dramatically. An explicit explanation of these significant changes needs to be provided.

Specific concerns regarding these changes are reflected in comments in subsequent sections of this review.

SH (3.4.2021): refer to comments in subsequent sections of this review, including the need to provide additional info in the "summary of changes in alignment with the project design with the original PIF" section.

Response to Secretariat comments

<p>? Most notably, there are major reductions in co-financing,</p>	<p>At the time of submission, the co-financing letters from many countries had not yet been secured.</p> <p>Co-financing secured so far now reaches USD 57 million.</p> <p>9 country co-finance letters are secured (out of 16). All executing and implementing partners have provided co-financing letters. The total co-finance ratio target is 1:6 which is different to, but not significantly so from the PFD.</p> <p>Norway has provided cash co-financing of NOK 39 603 960 in a funding agreement, in lieu of a co-financing letter. Sweden are also considering the provision of grant funds, but this will not be decided before their next programming cycle in 2021.</p> <p>Some partners were unable to commit co-finance at this stage and have been removed from that section. They will still be worked with through coordination and collaborative actions including UNEP/COBSEA, SACEP, WB and NOAA.</p>
<p>? Outcome 3.1 is completely absent,</p>	<p>Component 3 was reduced as no activities could be programmed at Project document submission. Outcome 3.1 is now reinstated and funding is allocated from components 1 & 2 (with funding of USD 400,000 from GEF-IW portfolio), and USD 300,078 from Norad.</p>
<p>? the EA responsibilities have changed,</p>	<p>The EA arrangements will be justified in section 1.11 and revised to ensure they are clear throughout the Project document including the role of government agencies.</p> <p>Tentative regional implementation partners in the PFD included: BOBP-IGO, SEAFDEC, IUCN/MFF (retained), UN Environment (e.g. COBSEA, GPA), UNIDO; APFIC (dropped).</p> <p>FAO accepts the EA arrangements are different to the PFD (with the removal UNEP, UNIDO, APFIC and UNEP/COBSEA). However, FAO notes the PFD only proposed options which were to be reviewed and decided on at submission as they have been. APFIC as an executing agency did not endorse this role during governance meetings (by its member countries) during the PPG phase discussions. APFIC as a regional fisheries body will provide technical advice to implementation within its mandate. As there were insufficient funds for significant partnership agreements, UN Environment (COBSEA, GPA) and UNIDO agreed to work through coordination and collaboration rather than as EA. Their roles are highlighted in the baseline and coordination sections of the Project document.</p>

<p>? and the CO2 targets increased dramatically. An explicit explanation of these significant changes needs to be provided.</p>	<p>The original EX-ACT and CO2 targets were undertaken by FAO experts and the figures have now been reviewed.</p> <p>The targets for both area coverage (303,000 ha of Sundarbans Reserve Forest) and CO2 reduction (2,959,482 tCO2 over a 20-year period) have been recalculated, agreed and approved by Bangladesh Forest Department.</p> <p>These targets are used throughout the Project document text, and details are contained in the embedded Annex Q: Project sub-proposal for the BOBLME II CCM component Blue Carbon for the Future (BCF): Enhancing the role Sundarbans ecosystem services and conservation of carbon stocks</p>
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2. Is the project structure/design appropriate to achieve the expected outcomes and outputs?

Secretariat comment at CEO Endorsement Request
(LKarrer Feb 13, 2020)

No.

1) Clarification is needed with regard to the execution of the project. The role of FAO as implementing agency, not executing agency, needs to be clear. Further, the relationship between FAO and the regional organizations, particularly BOB-IGO and APFIC, needs to be clarified.

SH (3.4.2021): not cleared. Table A 2.2 lists FAO as a GEF executing agency allocating \$277,000 to FAO execution of outcome 5.2. Please explain and note that per GEF policy the implementing agency cannot execute project activities.

2) Also with regard to institutional arrangements, the role of IUCN as overall regional lead (and host to PCU) needs to be clear as well as how IUCN will relate to the other regional entities. These roles, including the PCU hosted by IUCN, need to be reflected in the two organograms (Figures 6.1 and 6.2). Relatedly, the budget in Table 6.1 needs to reflect the various roles. In addition, the relevant ministry for each country needs to be listed and more information provided on their roles.

SH (3.4.2021): Not cleared. It is important for GEF to support the increase of national capacity in participating countries. Please include information in the portal and PRODOC submissions that speaks to IUCN's track record, capacity and competitive advantage as the designated primary executing partner. Further, the PRODOC should include information that clearly states how long-term capacity is distilled into national/regional governance entities towards performing future similar functions.

3) The PFD Component 3, Outcome 3.1 activities are missing from the CEO Endorsement Request. These activities are noted in the child project summary for FAO in **Annex A List of Projects Under the Program Framework** and must, therefore, be addressed in this child project. Bilateral funding was anticipated at PFD and if this was not secured, thereby affecting plans for the ports, then this change needs to be explained and funding provided for the other activities under Outcome 3.1.

In addressing this concern, attention needs to be given to answering Council's inquiries: "how will the creation of more effective water treatment infrastructure be handled and directly improved by this project outside of just Mandalay?" and "How will public awareness of pollution issues be increased?" Attention also needs to be given to address STAP's request to consider additional child projects related to waste water pollution (#6 in STAP concerns).

SH (3.4.2021): Cleared.

4) Section 6. Institutional Arrangements notes that the Bangladesh sub-project will be implemented "through a separate local partnership agreement". There is also mention that the sub-project will have its own NPSC . Please elaborate on the institutional arrangements for this sub-project, including what is meant by the local agreement.

SH (3.4.2021): Cleared.

5) The draft gender action plan (section A.4 Gender Equality and Women's Empowerment section) is focused on project operations, specifically ensuring women participate in training and planning. It is equally important to ensure the impacts of the project activities on women and men are considered. For example, if MPAs are established then the project needs to consider how both men and women will be affected and measures to address adverse effects. There is only one bullet noting consideration of women and men's needs (Outcome 2.1); all others are on participation.

SH (3.4.2021): Cleared.

6) The stakeholder summary table information in the CEO Endorsement (section A.3 Stakeholders, second table) suggests that there were a series of consultations in the countries. However, there is a lack of further detail. For each country only the government agencies are noted, not the CSOs or private sector organizations that need to be engaged. Also the stakeholder consultation information (Annex O) is missing for multiple countries. Further for the agencies that are noted, it does not explain how they have been or will be engaged in the project. The limited information makes it difficult to understand if stakeholders were sufficiently consulted and to understand who and how they will be engaged in the future. As noted in this section, the fishers in the community are the primary stakeholders; the authorities are secondary. It is, therefore, important to

understand who these fishers are and how to engage them (i.e. their associations). A clear stakeholder plan is needed that considers all the stakeholders.

SH (3.4.2021): Cleared.

7) The description of Outcome 2.1 Coastal and marine managed areas indicates several areas that have been selected and then notes several more candidate sites. A final list of sites was expected in the CER.

SH (3.4.2021): Cleared.

8) The Theory of Change section needs further consideration. The project components need to relate back to the Theory of Change. Further, as requested by STAP the causal linkages between the activities and the outcomes is missing. STAP requested this point be addressed during PPG.

SH (3.4.2021): Cleared.

9) Ensuring the long-term financial sustainability of this initiative post-GEF funding needs to be a part of the project. This issue needs to be addressed as noted by STAP.

SH (3.4.2021): Cleared.

10)

2. It is not clear how the project proposal for the CCM component in Bangladesh will lead to avoided degradation of 200,000 hectares of mangroves. The theory of change for this portion needs to be strengthened.

Current situation: while there is a description of the importance of the Sundarbans ecosystem as a carbon sink, in addition to other ecosystem services, as well as some of the drivers of mangrove ecosystem changes, the proposal does not explain what is the current state of degradation and/or deforestation in the targeted project area and its specific drivers. Please clarify.

Baseline projects: a list of potentially relevant projects in the country is listed, yet there is no sense of which are most relevant for the specific project area, activities and key stakeholders. Further, there is no overarching explanation of the existing baseline situation and remaining gaps. Please clarify.

Output 1: Sundarbans ecosystem services is better understood and co-management plans are improved: Please clarify to what extent data on natural resources extraction is already collected and what are the specific gaps in data and capacities of the Forest Department to justify the incremental reasoning of this output. Please also clarify how

this information relates to the drivers of mangrove degradation (including activity 1.3). Please strengthen Activity 1.5 to ensure its focused on enhancement and protection of carbon stocks (as opposed to the general 'sustainability lens').

Output 2: Overexploitation of aquatic resources is reduced: This output does not seem to be aligned with the CCM focal area strategy. Please clarify how this output will support the objective of enhancing and protecting carbon stocks.

Output 3: Blue carbon management and conservation activities are enhanced: there is not enough baseline information to assess if the activities under this output would effectively lead to the protection of 200,000 hectares of mangroves. Please clarify if it is expected that these activities reach 200,000 hectares directly. Please also clarify the theory of change of promoting alternative income-generating activities in the project area to reduce mangrove degradation.

SH (3.4.21): Not cleared. Three new outputs have been introduced in annex Q, but these are not reflected in Portal submission table B or the agency PRODOC. Please explain.

11) Minor issues:

* The Pro Doc left out Component 3; whereas the CER moved what was Component 4 to be Component 3. There needs to be consistency between the two documents.

SH (3.4.21): Not cleared. Please note that the PRODOC features an outcome 3.2 (Outcome 3.2: Demonstration Investments in Eco-Waste Infrastructure Solutions: Thanlyin and Ayeyarwady Watersheds.), however, the GEF Portal submission does not contain an outcome 3.2. Please ensure consistency across these two documents.

* Fix the grammar in the 1.6 Theory of Change section so consistent among bullets.

SH (3.4.21): cleared.

* Edit 'Table XXX' to 'Table 1.7' in description of Outcome 2.1 section.

SH (3.4.21): cleared.

* Edit 'figure below (Figure 1.6.1) in Theory of Change to reference instead the Pro Doc

* A.3 section should reference Annex O, not L

SH (3.4.21): cleared.

* Section 9 refers to 'Appendix 1' which should be 'Annex A' and edit Annex A1 to be Annex A

SH (3.4.21): cleared

SH (3.4.21):

Please note the following addition comments.

- **1.5. Project Objectives and components section:** In the PRODOC only some of the component descriptions include output descriptions. It is important to ensure uniformity so that outputs throughout the document use the same title and are described to the same level of detail. Further, when looking at the GEF portal submission and the PRODOC submission there are discrepancies both between the number of outputs featured in the respective documents, but also the names of the outputs. Please address these issues and ensure uniformity across the two submissions, while also making sure that all annexes remain updated, including the Results Framework.
- - Importantly, please note that when additional outputs are introduced, refined and/or moved compared to the council approved PFD design, then such changes should be described/justified in the section 1.11 'Summary of changes in alignment with the project design with the original PFD'.

Response to Secretariat comments

<p>GEF: Clarification is needed with regard to the execution of the project. The role of FAO as implementing agency, not executing agency, needs to be clear.</p>	<p>Section (6.1) and other sections have been revised for clarity.</p> <p>FAO's role will be as GEF implementing agency. FAO has no role in execution, beyond the oversight functions of the mid-term review and final evaluation. The detail of FAO's role is provided on page 70.</p> <p>IUCN will host the RCU and provide overall coordination of the execution and BOBLME outputs. IUCN will execute components and sub-components within their mandate and provide technical advice and capacity building. IUCN will coordinate national focus area level execution.</p> <p>SEAFDEC and BOBPIGO will execute component 1 and contribute to Outcome 3.1 and component 5 on sub-regional coordination and approaches in areas within their fishery mandates and provide technical advice and capacity development (Component 1 EAFM capacity development, combatting IUU and MCS capacity development).</p> <p>All three executing agency partners should coordinate between components including, and all contribute to Component 5 (regional mechanism; governance).</p>
<p>Further, the relationship between FAO and the regional organizations, particularly BOB-IGO and APFIC, needs to be clarified.</p>	<p>APFIC (which has 21 members and scope far beyond BOBLME) did not endorse this role during governance meetings (by its member countries) during the PPG phase discussions. In addition, APFIC cannot act as an executing agency as it does not have an autonomous budget, separate from FAO.</p> <p>APFIC, as a regional fisheries body with competence across the BOBLME, and with a secretariat in the FAO Regional Office, will provide technical advice to executing agency partners (BOBP-IGO, SEAFDEC, IUCN), seek synergies on regional cooperation and learning, within its mandate.</p>
<p>2) GEF</p> <p>Also with regard to institutional arrangements, the role of IUCN as overall regional lead (and host to PCU) needs to be clear as well as how IUCN will relate to the other regional entities. These roles, including the PCU hosted by IUCN, need to be reflected in the two organograms (Figures 6.1 and 6.2).</p>	<p>Section 6 is now updated. Please refer to the short paragraph on IUCN above, and Project Document text (pages 68-69).</p> <p>The two figures 6.1 and 6.2 have been merged and the organogram is now reflected as Figure 6: Implementation and execution arrangements of the BOBLME II project (page 76).</p> <p>All three EAs have a contractual relationship with FAO (the Operational Partnership Agreement). In addition, the two RFBs BOBP-IGO and SEAFDEC have reporting duties to IUCN (as overall regional Lead and host of the RCU), under Memoranda of Agreement or similar collaborative arrangements.</p>
<p>Relatedly, the budget in Table 6.1 needs to reflect the various roles.</p>	<p>The budget table 6.1 has been comprehensively updated to reflect the respective allocations and component responsibilities of the 3 EAs.</p>

<p>In addition, the relevant ministry for each country needs to be listed and more information provided on their roles.</p>	<p>Ministries are listed in Section 6.1 (pages 71-73), and details on their respective roles in project implementation are provided (in tabulated form).</p>
<p>3) The PFD Component 3, Outcome 3.1 activities are missing from the CEO Endorsement Request.</p> <p>These activities are noted in the child project summary for FAO in Annex A List of Projects Under the Program Framework and must, therefore, be addressed in this child project.</p> <p>Bilateral funding was anticipated at PFD and if this was not secured, thereby affecting plans for the ports, then this change needs to be explained and funding provided for the other activities under Outcome 3.1.</p>	<p>This component and outcome have been reinstated along with some limited activities.</p> <p>Funding options have been reviewed and resources redirected from Components 1 and 2. FAO has made efforts to find bilateral and other donors to support the component. Whilst these have not yet been realized the prospect for additional resourcing is positive.</p> <p>Discussions with Norway and Sweden show promise, although funding will not be available in 2021. It is anticipated that additional funding could be leveraged in 2022 with the next round of SIDA planning and interaction with Norad programmes related to marine litter.</p> <p>There are synergies with global FAO and Norway programmes on marine litter and abandoned, lost, discarded fishing gears (ALDFG). In-kind support is potentially available through the FAO global work on marking fishing gear (lost and abandoned gear); Norwegian supported IMO/FAO GloLitter project (participating countries India, Sri Lanka, Indonesia and Thailand); IUCN activities related to marine plastic assessments; and in-kind activities of SEAFDEC. Local partnerships (e.g. with EJV in Thailand) may also provide synergies to build on and leverage additional resources.</p>

In addressing this concern, attention needs to be given to answering Council's inquiries: ?how will the creation of more effective water treatment infrastructure be handled and directly improved by this project outside of just Mandalay?? and ?How will public awareness of pollution issues be increased??

Attention also needs to be given to address STAP's request to consider additional child projects related to waste water pollution (#6 in STAP concerns).

The original project document was prepared based on the implementation of the FAO Fisheries Child project. These comments relate to the broader programme. To address the linkage, some coordination is now integrated, through component 3.

FAO will discuss resources from the ADB child for this purpose and reintegrate to this Outcome. A significant change that has been introduced to the ADB funding is the inclusion of coastal sites beyond the original focus on Mandalay. The additional ADB Child Project Areas are: Mawlamyine and Hpa-An, on water quality issues. These are both coastal / river mouth locations, improving coherence with the BOBLME II objectives.

Mawlamyine is the capital of Mon State and is located at the mouth of the Thanlwin River. Hpa-An is the capital of Kayin State and is located 50 km upstream on the Thanlwin River. Mawlamyine and Hpa-An are similar towns with a population of 250,000 and 150,000 respectively. Currently, domestic waste in both cities is not treated, and nearly 100% of the waste drains directly into the Thanlwin River, and the Bay of Bengal.

At this time, additional child projects are not available under national STAR allocation; they can be explored through GEF 7 allocation for IW.

The elements of new child projects have been discussed with countries during PPG discussions and these will need to be taken forward at a later date.

<p>4) Section 6. Institutional Arrangements notes that the Bangladesh sub-project will be implemented "through a separate local partnership agreement". There is also mention that the sub-project will have its own NPSC.</p> <p>Please elaborate on the institutional arrangements for this sub-project, including what is meant by the local agreement</p>	<p>This is now described more fully in Annex Q (Section 15).</p> <p>The project will be governed by the regional Project Steering Committee (PSC) The project will be executed by the country-level Project Management Unit (PMU). The PMU will act as country-level secretariat, and be responsible for providing country-level PSC members with all required documents in advance of meetings, including agendas and background documents. PMU will ensure timely and appropriate logistical arrangements for meetings, including translation services as requested. It will circulate minutes to the PSC members for review and clarification prior to finalization and will archive the meeting minutes, and will facilitate the relevant inter-sessional collaboration of PSC members.</p> <p>The National Project Coordinator from the Forest Department will oversee the project's execution and ensure that all activities are executed in accordance with the project document, inception report, and updates or amendments approved by the PSC.</p> <p>The CCM sub project is developed under the national STAR allocation with Forestry Department (FD), who have expressed their desire to strengthen existing Sundarbans focused governance mechanisms.</p> <p>As per the Government of Bangladesh rules, a PSC and PIC are constituted by the lead ministry for any project that includes external (international) financial flows.</p> <p>The local partnership agreement will be a Letter of Agreement with FD.</p>
<p>5) The draft gender action plan (section A.4 Gender Equality and Women's Empowerment section) is focused on project operations, specifically ensuring women participate in training and planning.</p> <p>It is equally important to ensure the impacts of the project activities on women and men are considered. For example, if MPAs are established then the project needs to consider how both men and women will be affected and measures to address adverse effects. There is only one bullet noting consideration of women and men's needs (Outcome 2.1); all others are on participation.</p>	<p>The PPG was unable to develop a full gender strategy during consultations, although the first phase of BOBLME developed a gender assessment and plan. The text on gender targets was removed at submission and has now been reinstated.</p> <p>Please refer also to narrative on gender in Section 3.2 Gender Action Plan (page 57).</p> <p>A draft Gender Action Plan (GAP) for the project has been prepared along with tentative activities (Annex O).</p> <p>This GAP will be developed fully during inception work planning period and based on country needs and consultations with implementing partners. This updated GAP will include gender specific outcomes, outputs and activities, budgets and revised indicators for the project, including an updated project baseline.</p> <p>Gender focal points and/or champions in each country will be identified and consulted throughout the GAP elaboration process.</p> <p>The updating of the GAP will be undertaken at the same time as the national and regional work planning and will include capacity development for key staff. Tentative targets relating to gender equality according to project outcome are described.</p>

<p>6) The stakeholder summary table information in the CEO Endorsement (section A.3 Stakeholders, second table) suggests that there were a series of consultations in the countries. However, there is a lack of further detail.</p> <p>For each country only the government agencies are noted, not the CSOs or private sector organizations that need to be engaged.</p> <p>Also the stakeholder consultation information (Annex O) is missing for multiple countries.</p> <p>Further for the agencies that are noted, it does not explain how they have been or will be engaged in the project. The limited information makes it difficult to understand if stakeholders were sufficiently consulted and to understand who and how they will be engaged in the future.</p> <p>As noted in this section, the fishers in the community are the primary stakeholders; the authorities are secondary. It is, therefore, important to understand who these fishers are and how to engage them (i.e. their associations).</p> <p>A clear stakeholder plan is needed that considers all the stakeholders.</p>	<p>Section 2.1 Stakeholders and Roles in Project Implementation in the BOBLME (page 54) has now been expanded. A more complete list of stakeholders and their engagement has been developed based on the TDA SAP and other projects with roles and responsibilities added and provided in tabulated form.</p> <p>During the BOBLME PPG stage a wide range of stakeholders were consulted. These represented stakeholders at national, sub-regional and regional level. Full details of the consultation process outputs are attached in Annex P (Annex P: Stakeholder Consultation (PPG) Meeting Reports and country baselines ? also PPG Inception Workshop and PSC Meeting Reports)</p> <p>The consultation process included stakeholders from all levels and classifications, and their potential roles in project implementation were defined. The stakeholders? engagement plan is presented in Annex H2.</p> <p>At time of submission some reports were pending. FAO now has all the reports available.</p> <p>FAO were unable to consult directly with primary stakeholders due to the limited budget for PPG. One national workshop was undertaken in each country (but also state level consultation in India, and a sub-regional consultation in South Asia).</p> <p>The Project document proposes that national implementation plans along with full stakeholder identification and engagement plans will be developed during extended inception planning. Detailed stakeholder consultation activities will be planned during inception and once the sites for implementation are agreed. At this time, additional primary stakeholders (e.g. resource users, communities) will be identified.</p>
<p>7) The description of Outcome 2.1 Coastal and marine managed areas indicates several areas that have been selected and then notes several more candidate sites. A final list of sites was expected in the CER.</p>	<p>The section has been revised and updated to reflect sites identified.</p> <p>The list of tentative sites is provided in Table 1.7 in that section and in the Annex E (Maps). The maps section was not included in the original submission.</p> <p>Sites identified build on those discussed during the TDA-SAP and PFD discussion (and PPG consultations), and FAO is confident that these remain priority areas for countries.</p> <p>It was only possible to identify sites in some countries. Deeper consultation will be undertaken during inception planning to allow countries to identify areas that are priority and where integration of implementation can be effective (Focus Areas). Countries were asked to provide one or two priority sites for implementation.</p> <p>The level of consultation and planning required to identify and agree these during PPG was significantly beyond the resources available.</p>

<p>8) The Theory of Change section needs further consideration. The project components need to relate back to the Theory of Change. Further, as requested by STAP the causal linkages between the activities and the outcomes is missing. STAP requested this point be addressed during PPG.</p>	<p>The TOC had been updated as per the request of the STAP and additional details and linkage have been provided.</p> <p>The long-term goal, or expected long-term change of the project is a healthy ecosystem and sustainability of living resources for the benefit of the coastal populations of the Bay of Bengal Large Marine Ecosystem (BOBLME). The underpinning long-term 'Theory of Change' (TOC) outlined during the first phase of the project still holds for this implementation phase and is summarized in the figure below (Figure 3). During the PPG it was recognized that updating and strengthening the TOC during inception would be of benefit. The update should focus on the description of causal linkages between activities once they are agreed.</p> <p>The TOC narrative now also refers to the Development objective: 'Potential Economic Value of all Ecosystem Services provided by the BOBLME realized?':</p> <p>Human Rights respected, and Local Communities and Fisheries Stakeholders? Livelihoods secured. The achievement of these impacts will be underpinned by the production of the outputs and realization of the various outcomes, ranging from the adoption of an ecosystem approach to fisheries and combatting IUU fishing, to biodiversity conservation using spatial approaches (MMAs), improving water quality as well as resilience and livelihoods of coastal communities. All of these will be secured through establishing a regional collaborative mechanism using a consortium-type arrangement.</p> <p>The integrated Focus Area implementation approach adopted by the project (see Annex S) will ensure TOC objectives are achieved at multiple levels and including in the implementation areas. Achievement of the 3rd tier TOC impacts and longer-term impact will likewise depend on a second phase of a longer-term BOBLME programme.</p>
<p>9) Ensuring the long-term financial sustainability of this initiative post-GEF funding needs to a part of the project. This issue needs to be addressed as noted by STAP.</p>	<p>This is included in the work plan under Component 5: Regional mechanism for planning, coordination and monitoring of the BOBLME and specifically Outcome 5.1. Strengthened institutional mechanisms at regional and national levels for planning, coordination and monitoring of the BOBLME.</p> <p>Along with other activities this output includes the formation of a country-led regional working group to review sustainable long-term financing of the CCR BOBLME. This is included under Component 5 (Table 1.20) and includes the appointment of a working group to address this issue within the first year.</p> <p>Achieving financial sustainability is likely to require the future agreement (and availability) of dedicated - while perhaps relatively modest - country (national) budgets to provide means for post-GEF funding coordination, monitoring, reporting or similar activities.</p>

<p>10) It is not clear how the project proposal for the CCM component in Bangladesh will lead to avoided degradation of 200,000 hectares of mangroves.</p>	<p>This sub-component has now been revised and the avoidance of degradation is achieved through three main outputs.</p> <ul style="list-style-type: none"> ? Output 1: Sundarbans ecosystem services are better understood and valued ? Output 2: Non-ecofriendly utilization of forest and aquatic resources is reduced in collaboration with local stakeholders ? Output 3 Increased capacities and institutional collaboration for blue carbon management <p>The proposal is presented in Annex Q, the changes from the originally submitted proposal, are explained in the embedded document below. This includes an updated Theory of Change and Institutional arrangement diagram. Please refer to this for details.</p> <p>Please note: The hectarage has been increased to 303,000 hectares. This is approved by BGD Government Forest Department.</p>
<p>The theory of change for this portion needs to be strengthened.</p>	<p>The TOC has been improved in the document embedded above.</p>
<p>Current situation: while there is a description of the importance of the Sundarbans ecosystem as a carbon sink, in addition to other ecosystem services, as well as some of the drivers of mangrove ecosystem changes, the proposal does not explain what is the current state of degradation and/or deforestation in the targeted project area and its specific drivers. Please clarify.</p>	<p>This is addressed in the first two paragraphs of Section 1.4 of the BGD-CCM proposal, and to a limited extent in Section 1.3.</p>
<p>Baseline projects: a list of potentially relevant projects in the country is listed, yet there is no sense of which are most relevant for the specific project area, activities and key stakeholders. Further, there is no overarching explanation of the existing baseline situation and remaining gaps. Please clarify.</p>	<p>This is now addressed in Section 1.4 of the proposal, starting paragraph 3.</p> <p>The list of baseline projects ends with sentences in italics to indicate the type of alignment or coordination that will occur with projects that are most relevant.</p>

<p>Output 1: Sundarbans ecosystem services is better understood and co-management plans are improved: Please clarify to what extent data on natural resources extraction is already collected and what are the specific gaps in data and capacities of the Forest Department to justify the incremental reasoning of this output. Please also clarify how this information relates to the drivers of mangrove degradation (including activity 1.3). Please strengthen Activity 1.5 to ensure its focused on enhancement and protection of carbon stocks (as opposed to the general ?sustainability lens?).</p>	<p>The activity (1.1) has been revised to indicate incremental reasoning. There is no activity 1.5.</p>
<p>Output 2: Overexploitation of aquatic resources is reduced: This output does not seem to be aligned with the CCM focal area strategy. Please clarify how this output will support the objective of enhancing and protecting carbon stocks.</p>	<p>Output 2.2 has been revised to explain the links between protection of aquatic resources and carbon stock.</p>
<p>Output 3: Blue carbon management and conservation activities are enhanced: there is not enough baseline information to assess if the activities under this output would effectively lead to the protection of 200,000 hectares of mangroves. Please clarify if it is expected that these activities reach 200,000 hectares directly.</p>	<p>Some answer required here.</p> <p>The Sub-component aims to achieve improved protection mainly through capacity development, primarily directed at Forest Department personnel, and enhanced institutional collaboration, including the institutions Bangladesh Forest Research Institute, Khulna University, and Bangladesh Fisheries Research Institute, and following the key principles of co-management.</p> <p>Please note: The hectarage has been increased to 303,000 hectares. This was approved by BGD Government Forest Dept.</p>
<p>Please also clarify the theory of change of promoting alternative income-generating activities in the project area to reduce mangrove degradation.</p>	<p>A Theory of Change has been developed and is provided in the document embedded above.</p> <p>There is no longer the alternative income generation activity in Output 3. However, the initiative under Activity 2.2 will ?demonstrate climate-resilient fisheries or aquaculture technologies?, which could also include management innovations that can reduce non-ecofriendly forest and aquatic resource utilization, mitigate climate risks, and improve incomes.</p>
<p>11) Minor issues:</p>	

? The Pro Doc left out Component 3; whereas the CER moved what was Component 4 to be Component 3. There needs to be consistency between the two documents.	Agreed. Reinstating Component 3, Output 3.1 has resolved this issue
? Fix the grammar in the 1.6 Theory of Change section so consistent among bullets.	Corrected
? Edit ?Table XXX? to ?Table 1.7? in description of Outcome 2.1 section.	Corrected
? Edit ?figure below (Figure 1.6.1) in Theory of Change to reference instead the Pro Doc	Corrected
? A.3 section should reference Annex O, not L	Corrected. This now refers to Annex Q, the embedded revised BGD-CCM proposal.
? Section 9 refers to ?Appendix 1? which should be ?Annex A? and edit Annex A1 to be Annex A	This has been corrected ? 9.1 Refers now to Annex A1: Results Framework

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

Secretariat comment at CEO Endorsement Request
(LKarrer Feb 13, 2020)

No. The PFD indicated the ADB child project would be \$4,583,105; whereas the ADB CEO Endorsement request indicates \$4,587,156. The PFD indicated that \$504,587 would be spent from CCM Bangladesh STAR funding; however, the CEO Endorsement indicates it will be \$494,161. Please correct these figures to align with the PFD.

SH (3.4.21): Not cleared. Please update relevant annexes. Examples of none updated annexes include annex Q , while the combined set of annexes pp 349 also contains an old budget table specific to the Bangladesh intervention.

The allocations for audits noted in the Pro Doc Annex A2, Table A2.3 row 41 and in Table 9.1 in the CER need to be moved to be covered by the PCU budget.

SH (3.4.21): Not cleared. Audit and reporting for all 3 EA partners of 121,750 USD have to be included under PMC, not under the M&E budget. Please make the necessary corrections.

SH (3.4.21): please also address the below additional comments:

- - The provided budget tables do not give the detailed break-down by expenditure category i.e. consultants, goods, travel, training, etc. The only budget table which gives

such information is the one for Bangladesh CCM component, but not other components. Please provide an overall and complete total project budget with sufficient details as requested in GEFs Project Cycle Guidelines.

Response to Secretariat comments

<p>The PFD indicated the ADB child project would be \$4,583,105; whereas the ADB CEO Endorsement request indicates \$4,587,156. The PFD indicated that \$504,587 would be spent from CCM Bangladesh STAR funding; however, the CEO Endorsement indicates it will be \$494,161.</p> <p>Please correct these figures to align with the PFD.</p>	<p>The Project document refers to the intervention of FAO. It does not make a reference to the budget or value of the ADB child project.</p> <p>The CCM STAR Bangladesh values have been updated to USD 504,581 as visible throughout the Project document..</p>
<p>The allocations for audits noted in the Pro Doc Annex A2, Table A2.3 row 41 and in Table 9.1 in the CER need to be moved to be covered by the PCU budget.</p>	<p>Noted. The budget table has been revised as requested and is presented as Annex A2 Table A2.2</p>

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

Secretariat comment at CEO Endorsement Request
 cu(LKarrer Feb 13, 2020) Yes

SH (3.4.21): Recent events in Myanmar necessitates that GEF inquire further on the potential risks specific to this project in particular, but also the larger program in which it sits:

1. Please explain the consequences of the resent events in Myanmar for project activities. E.g. who are the anticipated country level executing partners and how will such activities be executed given the current political turmoil? Similarly, an analysis of the potential ramifications specific to the larger program should be presented, along with contingency plans and updated Environmental and Social Risk Assessment (safety of staff etc.).
2. As you update the Environmental and Social Risk Assessment, please consider how current and expected future COVID challenges may be included.
2. Please explain if it is FAO policy for the Environmental and Social Risk Assessment be signed by a senior FAO staff? If yes, a signed version should be submitted as part of the re-submission.

Response to Secretariat comments

n.a.

5. Is co-financing confirmed and evidence provided?

Secretariat comment at CEO Endorsement Request

(LKarrer Feb 13, 2020)

No. There has been a dramatic reduction in co-financing since the PFD. The PFD indicated \$105M (not including the ADB \$60M loan); the CER indicates \$2.5M in co-financing. The PFD anticipated co-financing from the recipient governments (\$80M), FAO (\$10M), Japan Fund and donor countries none of which has materialized. Co-financing is now only from BOBP-IGO, SEAFDEC, and Thailand government. This reduction is a major concern. \$2.5M co-financing is not sufficient for a \$9.5M GEF project. This reduction indicates a lack of support. Such a potential reduction will have a significant effect on the execution of activities, the ability to meet the envisioned project outputs and outcomes and raises serious concerns regarding the long-term sustainability of the project activities. A substantial effort needs to be put into securing co-financing to support this project as it can not be technically cleared with this current level of co-financing.

This possible reduction was noted as a concern by STAP in their review and needs to be addressed.

In Council comments, there was the suggestion to consult with NOAA regarding possible co-financing. Please explain to what extent that possibility was pursued.

SH (3.4.2021): Not cleared. Co-finance letters from Indonesia and Sri Lanka are missing and should be submitted.

Further, the question of available cofinance is relevant specific to the context of COVID. In the project document, please be more specific on COVID risks and clarify if/how the projects soft/hard (pilots etc.) will contribute to the short-long term ?build back green? better agenda. Please also consider incorporating the following considerations into the COVID risk analysis section:

- o Does the intervention have a plan in place to manage a possible re-instatement of COVID-19 containment measures?
- o Government capacity as human resources are mobilized elsewhere;

- o Change in capacity of other executing entities and the effectiveness of the overall project implementation arrangement;
- o Changes in project implementation timelines;
- o Changes in baseline (both ongoing and forthcoming projects);
- o Change in conditions of beneficiaries;

Response to Secretariat comments

<p>There has been a dramatic reduction in co-financing since the PFD. The PFD indicated \$105M (not including the ADB \$60M loan); the CER indicates \$2.5M in co-financing. The PFD anticipated co-financing from the recipient governments (\$80M), FAO (\$10M), Japan Fund and donor countries none of which has materialized. Co-financing is now only from BOBP-IGO, SEAFDEC, and Thailand government. This reduction is a major concern. \$2.5M co-financing is not sufficient for a \$9.5M GEF project. This reduction indicates a lack of support. Such a potential reduction will have a significant effect on the execution of activities, the ability to meet the envisioned project outputs and outcomes and raises serious concerns regarding the long-term sustainability of the project activities. A substantial effort needs to be put into securing co-financing to support this project as it cannot be technically cleared with this current level of co-financing.</p> <p>This possible reduction was noted as a concern by STAP in their review and needs to be addressed.</p> <p>In Council comments, there was the suggestion to consult with NOAA regarding possible co-financing. Please explain to what extent that possibility was pursued.</p>	<p>There is no intention to reduce the co-finance. Overall, the level of co-finance reflected the co-finance letters received on the day of submission.</p> <p>Since then additional co-finance letters have been received for total of USD 57 million, with expectation of additional letters.</p> <p>At the time of submission, the co-financing letters from many countries had not yet been secured.</p> <p>Countries have agreed to the co-finance and are processing our request since August 2019 (and earlier). Co-financing secured so far now reaches USD 57 million. 9 country co-finance letters are secured (out of 16).</p> <p>All executing and implementing partners have provided co-financing letters. The total co-finance ratio target is 1:6 which is different to, but not significantly so from the PFD.</p> <p>Norway has provided cash co-financing of NOK 39,603,960 in a funding agreement, in lieu of a co-financing letter. Sweden are also considering the provision of grant funds, but this will not be decided before their next programming cycle in 2021.</p> <p>Some partners were unable to commit co-finance at this stage and have been removed from that section. They will still be worked with through coordination and collaborative actions including UNEP/COBSEA, SACEP, WB and NOAA.</p>
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6. Are relevant tracking tools completed?

Secretariat comment at CEO Endorsement Request

(LKarrer Feb 13, 2020)

No. Information is provided on the core indicators in section G; however, the calculations are missing in Annex E. Please provide.

Also, thank you for providing the EX-ACT tool; however, there is not enough information on the assumptions made to adequately assess the GHG mitigation targets. How were the 200,000 ha (of 601,700 ha total) selected as the targeted area to be supported by this project with this small budget? Further, the EX-ACT calculation assumes that this area currently has no level of degradation, which without the project would lead to ?very low? degradation and with the project would remain as ?none?. Please justify and clarify these assumptions. If there is currently no degradation, what will lead the area to suffer very low degradation that will be avoided through the project?

SH (3.4.2021): Cleared.

In addition, Indicator 6 is incorrectly filled out. The reduction in GHG emissions for this project falls under Sub-Indicator 6.1 Carbon Sequestered or Emissions Avoided in the AFOLU (Agriculture, Forestry and Other Land Use) sector, not 6.2. Please move.

SH (3.4.2021): Not cleared. The edits have been applied in annex F, but when looking at the GEF portal indicators they have not been updated. Please address.

SH (3.4.2021):

Additional comments:

- Core Indicator 7.4 should be adjusted to 1.
- Core indicator 8 lists 1,200,000 tons of fisheries brought to more sustainable levels. Please note that the estimate should include the name of the fisheries targeted, the source for the estimate of tonnage, and the initial justification why it is considered overexploited. Project usually makes reference to an existing national/regional data sets. Please also include text specific to how this tonnage target aligns with the PFD target of 1 % of global fisheries, by volume, brought under sustainable management.

Response to Secretariat comments

(LKarrer Feb 13, 2020) No.	<p>Agreed.</p> <p>The FAO Project document has 2 sections for the core indicators: with all details in Annex F, and a shorter version in Annex N (the Project Information Section).</p> <p>The core indicators/targets now are reflected the same way throughout the document</p>
<p>Information is provided on the core indicators in section G; however, the calculations are missing in Annex E. Please provide.</p>	<p>Details on the core indicators are now provided in Annex F.</p>
<p>Also, thank you for providing the EX-ACT tool; however, there is not enough information on the assumptions made to adequately assess the GHG mitigation targets. How were the 200,000 ha (of 601,700 ha total) selected as the targeted area to be supported by this project with this small budget? Further, the EX-ACT calculation assumes that this area currently has no level of degradation, which without the project would lead to ?very low? degradation and with the project would remain as ?none?. Please justify and clarify these assumptions. If there is currently no degradation, what will lead the are to suffer very low degradation that will be avoided through the project?</p>	<p>Agreed and corrected.</p> <p>Details for the EX-ACT carbon calculations are provided in Annex 2 of the Project document Annex Q.</p>
<p>In addition, Indicator 6 is incorrectly filled out. The reduction in GHG emissions for this project falls under Sub-Indicator 6.1 Carbon Sequestered or Emissions Avoided in the AFOLU (Agriculture, Forestry and Other Land Use) sector, not 6.2. Please move.</p>	<p>This has been corrected</p>

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

Secretariat comment at CEO Endorsement Request

Response to Secretariat comments

n.a.

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

Secretariat comment at CEO Endorsement Request
(LKarrer Feb 13, 2020)

No. In the CER **Section 6.4 Coordination with other relevant GEF-financed projects and other initiatives** lists other relevant projects; however, it does not articulate how the GEF projects will be coordinated with these initiatives. Please elaborate on coordination plans.

SH (3.4.2021): Cleared. Please note that during inception the stakeholder engagement and com's strategies should also consider other relevant non-GEF initiatives.

Response to Secretariat comments

<p>(LKarrer Feb 13, 2020) No. In the CER Section 6.4 Coordination with other relevant GEF-financed projects and other initiatives lists other relevant projects; however, it does not articulate how the GEF projects will be coordinated with these initiatives. Please elaborate on coordination plans.</p>	<p>Agreed. The contents on coordinating plans has been elaborated and is found in Section 6.4 (pages 80-83) ? information has been added, summarized as ?coordination approach?</p>
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9. Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat comment at CEO Endorsement Request
(LKarrer Feb 13, 2020)

No. There are several concerns:

- a) The target indicator in the PFD was 170,000 metric tons of CO2 mitigated. In the CEO Endorsement this amount increased to 1,953,453 metric tonnes. Please explain this dramatic increase.

SH (3.4.2021): Cleared.

- b) The Project objective indicators do not include CO2 indicators, which were in the PFD.

SH (3.4.2021): Cleared.

c) The baseline numbers are the same as the target.

SH (3.4.2021): Not cleared. Please explain why a baseline of 170,000 metric tons of CO2 mitigated has been chosen? Intuitively it seems more logic to start with a baseline of 0 metric tons of CO2 mitigated.

d) The Final Target numbers are not consistent with the PFD (i.e. ha, percent)

SH (3.4.2021): Not cleared. Please note that when additional outputs are introduced/moved across outcomes and/or when changes are made to target numbers (e.g. tons CO2 equivalent, % numbers specific to fisheries sust. managed) then each of these changes should be accompanied by a short justification in the section 1.11 ?Summary of changes in alignment with the project design with the original PFD?.

e) Outcome 1.2 baseline 3. is higher than the midterm.

SH (3.4.2021): Cleared.

f) As requested in PFD review, there needs to be clarification as to what constitutes a ?strengthened MMA?. This is an issue in Outcome 2.1 and 2.2.

SH (3.4.2021): Cleared.

g) For some outcomes, plans are developed but not implemented. This concern is the case for Outcomes 2.1 and 2.2 in which the ?established MMAs? need to have management implemented in order to ensure conservation; otherwise they are paper parks.

SH (3.4.2021): Cleared.

h) For Outcome 2.1, 2. Number of MMA?s established or strengthened ? the baseline is ?4xMMA?s not established in project areas?, which is unclear. Similarly, the midterm and final target of MMAs ?not established? is equally confusing. Do you mean establish MMAs in areas outside the project area? This indicator does not reflect the idea of strengthened MMAs.

SH (3.4.2021): Cleared.

Response to Secretariat comments

<p>(LKarrer Feb 13, 2020) No There are several concerns</p>	<p>These points are agreed and the results framework has been double-checked against the targets in the document resolved in the text and results framework</p> <p>Text has now been included on METT score and IUCN Green List Assessment.</p> <p>Section 9 contains an extensive M+E plan and budgeted framework</p> <p>Annex A1 contains the results framework.</p>
<p>a) The target indicator in the PFD was 170,000 metric tons of CO2 mitigated. In the CEO Endorsement this amount increased to 1,953,453 metric tonnes. Please explain this dramatic increase.</p>	<p>This recalculation is explained in the above embedded PIF-PPG comparison document for BGD-CCM.</p> <p>The substantial increase is due in part to the increase of area covered, and also taking into account the additional 16-year capitalization period.</p>
<p>b) The Project objective indicators do not include CO2 indicators, which were in the PFD.</p>	<p>The indicator for CO2 reduction target has been added on Project Objective level in Annex A 1 (with reference to Outcome 2.2)</p>
<p>c) The baseline numbers are the same as the target.</p>	<p>This has been corrected in Annex A1</p>
<p>d) The Final Target numbers are not consistent with the PFD (i.e. ha, percent)</p>	<p>Some selected targets have been validated during PPG and reformulated. This became necessary as it was felt that more precision was required.</p>
<p>e) Outcome 1.2 baseline 3. is higher than the midterm.</p>	<p>This been corrected.</p> <p>Up to 5 countries have existing NPOA-IUU (the implementation thereof will be supported), while an additional 3 NPOAs is the target at midterm</p>
<p>f) As requested in PFD review, there needs to be clarification as to what constitutes a ?strengthened MMA?. This is an issue in Outcome 2.1 and 2.2.</p>	<p>There is now reference inserted to the text that ?improved protection and conservation (of species and habitats)? is evidenced by applying tools such as METT and also the IUCN Green List Assessment Reports</p>
<p>g) For some outcomes, plans are developed but not implemented. This concern is the case for Outcomes 2.1 and 2.2 in which the ?established MMAs? need to have management implemented in order to ensure conservation; otherwise they are paper parks.</p>	<p>Changes been made to indicate ?implemented?, both for EAFM plans and MMAs ? throughout the Project document and in particular in Annex G ? Indicative work plan.</p>

<p>h) For Outcome 2.1, 2. Number of MMA's established or strengthened ? the baseline is ?4xMMA's not established in project areas?, which is unclear. Similarly, the midterm and final target of MMAs ?not established? is equally confusing. Do you mean establish MMAs in areas outside the project area? This indicator does not reflect the idea of strengthened MMAs.</p>	<p>This has been reformulated and is clarified, under Outcome 2.1, in Annex A1.</p> <p>Please note that the Project will focus on already existing / established MMAs, notwithstanding the consideration of (the geographical scope of) ?implemented EAFM plans? as ?Other effective area-based conservation measure?, and therefore an MMA.</p>
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10. Does the project have descriptions of a knowledge management plan?

Secretariat comment at CEO Endorsement Request

(LKarrer Feb 13, 2020)

No. The paragraph description of knowledge management plans is insufficient. More information is needed regarding on what topics you plan to draw insights and how you propose to share those insights. A plan needs to be provided.

SH (3.4.2021): not cleared. As part of a KM plan, please include a budget, timeline and specific knowledge and learning deliverables. Also, in the detailed project budget (see previous comment specific to budget), please indicate which consultants/team members etc. that will handle KM related work. Projects are expected to report on implementation progress at mid-term; but are also invited to submit lessons learned and links to KM products as they become available, along with PIR submissions.

Response to Secretariat comments

Section 8, Knowledge Management has been revised (page 85)

The project will develop a knowledge management and communication strategy at the outset of the project implementation, with participation of all BOBLME partners. This will be based on strategic principles presented in FAO Knowledge Strategy 2011 and GEF's KM strategy. This Strategy will aim at ?stimulating the generation, dissemination and application of information and knowledge, including statistics.? The Knowledge Strategy will be conceptually rigorous but practical and results-based. It will both build upon successful techniques already being used and encourage innovation.

Agency Responses

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

GEFSEC

Secretariat comment at CEO Endorsement Request

Response to Secretariat comments

STAP

Secretariat comment at CEO Endorsement Request

(LKarrer Feb 13, 2020)

No. Most of STAP's concerns have been addressed; however, responses are completely lacking for items #5 (labor conditions) and #8 (economic benefits).

SH (3.4.2021): Not cleared. Please in the "response to STAP comments" annex include a response which addresses STAPs comment specific to labor conditions.

The following points have also not been sufficiently addressed as noted in previous comments:

- ? Co-financing reductions (#2) ? noted in co-financing comment.
- ? Theory of change detail (#4) ? noted in design.
- ? Suggestion to include additional wastewater projects (#6) ? noted in design.
- ? Stakeholder engagement plans (#10) ? noted in design.

SH (3.4.2021): Cleared.

Response to Secretariat comments

- ? (#2) Co-financing has not been reduced and is explained earlier.
- ? (#4) Theory of change has been amended.
- ? (#5) Labour conditions ? included primarily in Section 11 (page 91 ff. on decent rural employment), and throughout the text on EAFM and livelihoods
- ? (#6) Possibility of future child projects under additional financing to Component 3.
- ? (#8) Economic benefits are addressed in Component 4 in project design.
- ? (#10) Stakeholder engagement plans strengthened in the text, with updated table and engagement details.

GEF Council

Secretariat comment at CEO Endorsement Request

LKarrer Feb 13, 2020)

No. Council requested that the Project Document provide information on how indigenous peoples have been consulted and will be consulted as well as involved in the project. During PPG the indigenous communities were not consulted. Instead the Pro Doc (Annex I) provides a list of indigenous communities and indicates that additional steps will be undertaken once the project is underway through the FPIC (free, prior and informed consent) process. The steps reflect a top-down, one-way process that is not inclusive. The steps note ?information will be disclosed?, ?documentation of indigenous people?s needs? and ?complaints mechanisms?. In contrast, there is an explanation of an Indigenous Peoples Plan (IPP) that does reflect a more inclusive process, including measures to ensure the communities are included in planning and that affected populations receive benefits. Realizing consultations with the indigenous communities need to wait until the specific areas have been identified, GEF Sec agrees to do so during PPG. However, the process for engaging with the communities needs to be rethought to ensure inclusivity and respect for the communities.

SH (3.4.2021): not cleared. Please address the following two points:

- please include a sub-indicator in the Results Framework specific to tracking of IPP engagement and the development of FPIC plans. It should be clear that the sub-indicator will be populated within year one of project implementation and as part of developing a more robust baseline and while considering covid constraints.

- Annex I should be expanded to provide a more detailed overview of how IPP plans will look specific to this project. Please use the FAO project titled [Fostering Water and Environmental Security in the Ma and Neun/Ca Transboundary River Basins and Related Coastal Areas](#) as an example.

- On pp 21 in the combined annexes and specific to the subheading "B.2 Comments from Council": The response from FAO specific to column 2 is incomplete....: "Local community consent will be required before the project works in an area of". Similarly, the response from FAO specific to column 3 does not fully answer the donors question reg the definition specific to strengthening of MMAs ? Please edit these response.

Council also requested that the Theory of Change be improved to inform regional and country contributions towards the program's outcomes. It is not clear how this was addressed.

SH (3.4.2021): Cleared.

As requested by Council, clarification is needed in the CER and Pro Doc as to who will endorse the regional documents.

SH (3.4.2021): Cleared.

FAO needs to respond to Council comment #14 ?We advise reconsideration of the plan for a 20% increase in the ?landings??? The response provided (?This point d point ? but this is intended??) is incoherent.

SH (3.4.2021): Not cleared. Please note that such changes in project targets need to be captured under section "A. Summary of changes in alignment with the project design with the original PFD?. Please address.

Council requested clarification as to how each country will be held to their commitments to the project. Please respond.

SH (3.4.2021): Cleared.

The following Council concerns were noted in previous comments:

? need to clarify what constitutes ?MMA strengthening? - noted in the M&E comments.

S SH (3.4.2021): Cleared.

? offer to consider NOAA co-financing during PPG - noted in the co-financing comments.

SH (3.4.2021): Cleared.

? request for clarification on water treatment outside Mandalay - noted in the design comments.

SH (3.4.2021): Cleared.

? provide stakeholder consultation information ? noted in design comments.

SH (3.4.2021): Cleared.

SH (3.4.2021): Please note the following additional points:

- France provided PFD council

comments: <http://www.thegef.org/sites/default/files/work-program-documents/Compilation%20of%20Council%20Comments%20-%20June%202018%20Work%20Program.pdf>

Please update annex B to include responses to France comments.

Response to Secretariat comments

<p>GEF Council</p> <p>Council requested that the Project Document provide information on how indigenous peoples have been consulted and will be consulted as well as involved in the project. During PPG the indigenous communities were not consulted. Instead the Pro Doc (Annex I) provides a list of indigenous communities and indicates that additional steps will be undertaken once the project is underway through the FPIC (free, prior and informed consent) process. The steps reflect a top-down, one-way process that is not inclusive.</p>	<p>The PPG did not have sufficient funds to work extensively with countries to identify communities and consult.</p> <p>FPIC will be undertaken if IP exist in areas.</p> <p>A draft Focus Area approach has been developed (Annex S) jointly with EA IUCN.</p> <p>IUCN has developed and adheres to a Rights-Based Approach, based on the Union's Policy Instruments, Standards and Guidelines (2016, and updates).</p>
<p>The steps note ?information will be disclosed?, ?documentation of indigenous people?s needs? and ?complaints mechanisms?. In contrast, there is an explanation of an Indigenous Peoples Plan (IPP) that does reflect a more inclusive process, including measures to ensure the communities are included in planning and that affected populations receive benefits. Realizing consultations with the indigenous communities need to wait until the specific areas have been identified.</p>	<p>The language follows the standard text of FAO policy and guidelines.</p> <p>Consultations with IP were not conducted during PPG, due to insufficient funding.</p> <p>This will be conducted as part of the inception process.</p>

However, the process for engaging with the communities needs to be rethought to ensure inclusivity and respect for the communities	Agreed. This requirement has now been incorporated in Section 2.1 and Annex H2 (Stakeholder engagement), as well as Annex S (Focus Area Approach); the latter has been developed jointly with EA IUCN.
Council also requested that the Theory of Change be improved to inform regional and country contributions towards the program's outcomes. It is not clear how this was addressed.	The text of section 1.6, and the TOC diagram have been amended to reflect better the role of countries and (regional) partners, in particular on the 2nd tier: effecting behavioural change in order to achieve longer-term impact ? environmental benefits, (economic) ecosystem services while securing human rights and livelihoods.
As requested by Council, clarification is needed in the CER and Pro Doc as to who will endorse the regional documents.	Regional documents will be endorsed by the Regional Project Steering Committee (RPSC). A section has been included in the text of section 6.
FAO needs to respond to Council comment #14 ?We advise reconsideration of the plan for a 20% increase in the ?landings??? The response provided (?This point d point ? but this is intended??) is incoherent.	This has been resolved. The countries did not agree. A value rather than percentage has been inserted to provide flexibility
Council requested clarification as to how each country will be held to their commitments to the project. Please respond.	All countries are fully committed to the project and have signed up at high level to the SAP, PFD and now Project document. Countries have provided their co-financing commitments ? while the processing of some letters is still pending. All countries will also sign the project implementation agreement.
The following Council concerns were noted in previous comments	
? need to clarify what constitutes ?MMA strengthening? - noted in the M&E comments.	MMA strengthening is considered as the process which results primarily in improved protection and conservation, as evidenced by METT score and IUCN Green List Assessment reports. Text to this effect has been reinstated with reference to Outcome 2.1, also in the Results Framework Annex A1.
? offer to consider NOAA co-financing during PPG - noted in the co-financing comments.	NOAA were unable to commit co-finance 2019-2020. FAO will follow up during implementation.
? request for clarification on water treatment outside Mandalay - noted in the design comments	FAO has discussed with ADB. New coastal sites agreed in Mawlamyine and Hop An (river mouth of Thanlwin River and coast)
? provide stakeholder consultation information ? noted in design comments.	This information as is now provide as Annex P. Noting the limitation on resources for stakeholder consultation during the PPG phase.

Convention Secretariat

Secretariat comment at CEO Endorsement Request

Response to Secretariat comments

Recommendation

12. Is CEO endorsement recommended?

Secretariat comment at CEO Endorsement Request
(LKarrer Feb 13, 2020) No. Please address previous comments.

SH (3.4.2021): No, please address comments and resubmit. Further, please note that the child project PPG was approved as part of GEF ID 10069. As you resubmit, please resubmit this child project using GEF ID 10069 and transfer all documents from 10451 to 10069, as relevant.

Response to Secretariat comments

All the comments have been addressed. The project document has been reviewed and restructured accordingly. Consistencies in the figures, indicators, objectives has been checked. Additional information has been added. In some case the information have been uploaded directly in the portal, in some others the information is visible in external files uploaded as annexes (files **10451 BOBLME2 FINAL Project Document.pdf** and **10451 BOBLME2 FINAL Annexes.pdf**)

Review Dates

	Secretariat comment at CEO Endorsement Request	Response to Secretariat comments
First Review	2/13/2020	12/8/2020
Additional Review (as necessary)		

**Secretariat comment at CEO
Endorsement Request**

**Response to
Secretariat
comments**

**Additional Review
(as necessary)**

**Additional Review
(as necessary)**

**Additional Review
(as necessary)**