

# Promoting the blue economy and strengthening fisheries governance of the Gulf of Thailand through the Ecosystem Approach to Fisheries (GoTFish)

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10703

**Countries**

Regional (Malaysia)

**Project Name**

Promoting the blue economy and strengthening fisheries governance of the Gulf of Thailand through the Ecosystem Approach to Fisheries (GoTFish)

**Agencies**

FAO

**Date received by PM**

6/2/2022

**Review completed by PM**

6/8/2023

**Program Manager**

Leah Karrer

**Focal Area**

Multi Focal Area

**Project Type**

FSP

**PIF**

**CEO**

**Part I - General Project Information**

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

Secretariat comment at CEO Endorsement Request  
(PPO April 2023). No.

3. All operations comments have been addressed except for 6 and 8c.

a. The PMC funded by co-financing has not changed and at 0.8% of Sub-total ? if there is no possibility to increase co-financed PMC to a proportionate level as GEF-financed PMC, please consider reducing the GEF portion of PMC to a similar level of the co-financing.

b. The CTA cost is still being charged to component, Agency responded as following: ?Thank you for the suggestion ? we have revisited the budget. The co-finance part of the PMC is fully committed thus it is not possible to use co-finance to fund project staff.? Please explore the possibility to charge the CTA costs to PMC, to be financed from both GEF funding and co-financing consistently with the outcome from point (a.) above.

(PPO, Dec 6, 2022). No.

- 1) The table provided in Annex A (Project Results Framework) is off margins. Please find a way so that the table fits into the portal margins. Same applies to paragraph 11 of the project description and to Annex B
- 2) On the utilization of PPG : please provide details on the activities funded through the PPG. 97k for Human Resources and 77K for contracts is vague and does not provide any kind of information on the activities funded through the PPG. Please provide details on HR, contracts, general operating expenses
- 3) There is a 10k difference between the budget in Table B (Project description summary) and the amount stipulated in the overall project budget in Annex E. Please request the agency to correct where needed.
- 4) There is also a difference in component 3. Above Component 3 is only 500k and below it
- 5) On the budget: IW budget is not an eligible expense. Please remove this expense
- 6) The same comment applies to the lines highlighted in table sent by email (under component 1 and partners). Please remove these non-eligible expenditures.
- 7) On the cost associated with the Chief Technical Advisor: Per Guidelines, the costs associated with the project's execution should be charged to the GEF and the co-financing portion allocated to PMC but not to project components ? this includes the project's staff. With the expected increase of co-finance funds to be allocated to PMC (see comment 6 above), and with the current composition of co-financing with at least 7.0 million represented in grants, there may be room to cover the project's staff.
- 8) On monitoring and evaluation: the total budget for M&E provided in section 9 does not match the total budget for M&E provided in Annex E ( $\$178,204 + \$20,550 = \$198,754$ ). Please review and correct where necessary
- 9) On Council Comments: the agency did not include the answers to comments in Annex B. to comments from Council members from Denmark, Canada and Germany ? please amend.

## Agency Response

### **Response FAO**

a. Thank you for the comment ? we have checked with the executing agencies and also within FAO. Thanks to this revision, we can report an increase in the co-finance to a total of 6,465,927 USD, or 5.3 % of the co-financing.

Kindly note that the PMC co-financing is already entirely allocated for the management of the co-financing portion of the project, and there is no room for cost-sharing arrangements of the PMU's staff.

b. We have revised the budget as indicated, and now the CTA cost portion allocated to the PMC was increased to 6.6%. The remainder is allocated to the technical components because the CTA will deliver a lot of technical work. **Annex M TOR\_GoTFish**, provides details of the technical tasks that will be delivered by the CTO. The annex was uploaded in the roadmap of the submission as part of the **PDF GoTFish-Annexes**.

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#### **Response to comments made on 6 Dec 2022**

- 1) The margins of the table have been adjusted.
- 2) The costs under the budget items are as follows

##### Consultants:

- Costs of hiring international consultants to organize and facilitate national and regional consultations, regional validation workshop as well as project document drafting
- Costs of hiring national consultant each from the four countries for country data collection and to facilitate national consultations with national stakeholders.

##### Salaries Professional:

- FAO operational cost

##### Contract

- Cost to contract Sustainable Fisheries Partnership Foundation (SFP) to collect information/analyses and provide technical inputs for components 1 & 2 and to facilitate the regional discussions;
- Cost to cover the fiduciary assessment costs for the potential partners (SFP, Queensland University and SEAFDEC).

- 3) Thank you for spotting this ? it was a mistake that has now been corrected
- 4) Component 3.1 (IW) is 500,000 USD
- 5) It seems that some text was not appearing fully in the cell. The full text is: ?IW learning events and knowledge sharing (1 % of the IW budget)?. We have re-formatted the Excel and we hope it is visible now.
- 6) Thank you ? seems to be due to the same formatting issue, which has now been corrected

7) Thank you for the suggestion ? we have revisited the budget. The co-finance part of the PMC is fully committed thus it is not possible to use co-finance to fund project staff.

8) Thank you for noticing this ? this has now been corrected

9) Apologies, seems the responses were not correctly uploaded to the portal ? they are included in Annex B (pag. 25 and onwards).

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

Secretariat comment at CEO Endorsement Request

Agency Response

**2. Project Summary.**

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

**b) Does the summary capture the essence of the project and is it within the max. of 250 words?**

Secretariat comment at CEO Endorsement Request

(Sapijanskas (4) April 2023). No.

4. This comment was not fully addressed, as references to MMA and Marine managed area(s) remain in the portal entry (see examples below). Please correct and replace systematically by MPA.

(Karrer (3); Sapijanskas (1, 2, 4). No.

3. Although some text has been added in the narrative, Table B has not been modified and still is focused solely on ecological concerns suggesting lack of intent to incorporate socioeconomic aspects. Please revise Table B.

4. Thank you for the response and for reverting back to the use of the term MPA. Please however correct the dozen remaining references to Marine managed area(s) / MMA(s) throughout the portal entry (see images sent by email).

(Karrer (3), Fairbank, Sapijanskas (1, 2, 4), July 12, 2022). No.

1. Please include a brief (couple of sentences) statement of the project's TOC

2. Output 3.2.1 and 3.3.1: Please explain in plain language what the project is to do under these outputs, i.e. clarify the underlying activities. The only underlying activity under 3.2.1 ("Implementation of the seascape approach in managing marine ecological corridors

throughout the East Coast Peninsular Malaysia at the state level") is indeed less clear and far less concrete than the output itself. Likewise, the only activity under 3.3.1 ("Incorporate resilience-based management planning and resilience assessment methodology into marine spatial planning system/guideline") does not appear linked to the output (establishment of a participatory monitoring system) and is identical to activity 3.3.3

3. In Component 3, the corridor analyses and MSP plans are focused entirely on ecological data and lack socioeconomic considerations. The CER states the project will provide fair and equitable benefits for all stakeholders, particularly local communities; however, there are no plans to collect the relevant data as to who are the stakeholders, their levels of dependencies on the marine ecosystems for fishing or other services, and how they will be impacted by management and decision-making. There is brief mention as Activity 3.1.1d Mapping of economic activity areas, but no explanation as to how that information will be collected; whereas the other ecologically-based studies have detailed explanations. For management to be effective, the social and economic aspects need to also be considered, such as where people are fishing, which demographics will be affected by policies (e.g. fishing regulations), what alternatives exist for their fishers, and what are their perceptions regarding the need to regulate fishing. Further, funding needs to be allocated in the budget for the socioeconomic data collection and analyses.

4. We note the change in vocabulary from MPA to Marine Manage Areas (MMAs) in some outputs and the intention to use the METT for MMAs (indicator 3.3.1). Please clarify what is the difference between the two terms in the context of this project. If some MMA are not MPAs in the globally accepted sense, please clarify how the METT would apply and be useful for these MMAs.

## Agency Response

### Response FAO

**On MMA:** The reference to the MMA or Marine protected areas has been removed. The only place appearing now is related to the Summary of changes in alignment with the project design with the original PIF, as in the PIF text made reference to MMA/Marine protected area.

**On socioeconomic aspects:** Table B has been revised to incorporate socioeconomic aspects, which are now included in outcome 3.1 and related outputs.

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### Response to comments made on 6 Dec 2022

3) Thank you for the observation. The Outcome 3.1, and Outputs 3.1.1 and 3.1.3 have been modified to clearly make mention to fishery socioeconomic considerations as relevant.

4) Apologies for this omission ? the correct term MPA has been integrated throughout.

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**Response to comment 1.** The project's ToC is explained in the paragraph 70. The text is as follows:

The project's ToC identifies key environmental issues and barriers to address notably: the lack of sub-regional decision-making forums, limited livelihood options for fishers and their reliance on fisheries resources, the lack of incentive mechanisms to promote sustainable fisheries (particularly in small-scale fisheries), and the lack of alignment between fisheries and biodiversity objectives. The ToC proposes that to facilitate the transition to sustainable fisheries in the GoT to realize its blue economy potential and associated ecosystem benefits, requires the combination of strategies, actions and impacts to challenge the current conditions and which will a) address negative impacts of fisheries through regional fisheries governance and management (including coordination mechanisms and the development of joint fisheries management plans); b) strengthen trust and relationships through partnerships and better communication channels, c) use incentives (market and others to enable behaviour changes that enhance fishery sustainability, d) enhance and share knowledge through targeted capacity building on key issues (e.g. fisheries issues and a better understanding of aquatic ecological corridors), and strong and reliable communication channels. The outcomes will a) contribute to efforts for the elimination IUU fishing; b) recapture benefits from fisheries and their value chains, and; c) sustain biodiversity and aquatic resources through the use of an ecosystem approach to fisheries.

**RESPONSE to comment 2:** We realize that it was not clear how 3.1 links to 3.2. To explain output 3.2.1, it is useful to review what occurs prior to this step under outcome 3.1. Outcome 3.1 will create a series of maps revealing the distribution of resources at two scales:

a) At the regional GoT scale, the project will undertake desktop-based mapping of key fishery migration corridors and then assemble the latest data to map key biodiversity targets, such as cetaceans.

b) Within the focal area of East Coast Peninsula Malaysia, the project will undertake more detailed mapping of key marine habitats (mangroves, seagrass beds, coral reefs), as well as model the fish and coral larval dispersal connecting coral reefs. This information will then be uploaded to the Department of Fisheries Malaysia web-based database that is currently being developed.

**Output 3.2.1** will use the static data layers developed under Outcome 3.1, to model how the seascape functions and therefore how alternative management decisions (such as where to locate MPAs) will influence outcomes. The activities under this output will examine the connectivity of threatened species, fisheries target species, and biodiversity across three scales: regional migration, inter-habitat ontogenetic migration, and larval dispersal.

**Tentative Activities:**

? **Activity 3.2.1.a** *Compilation of existing data on migratory species throughout Malaysia Waters (and transboundary GoT areas).* While some of these data, such as turtle nesting sites (data.unep-wcmc.org), occur in existing global databases, many are held locally. The project will work with local organizations within the GoT to collaborate, share their data, and contribute to the open-access metadata system MiCO (Migratory Connectivity in the Ocean), which was created by UQ research scientist Dr Daniel Dunn (a member of the project). Daniel's team use a variety of modelling approaches to help estimate migratory corridors using available data[1]<sup>1</sup>

? **Activity 3.2.1.b** *Estimate the strength of ontogenetic migration for fisheries species that use coastal wetlands, including mangroves, as nursery habitats prior to moving offshore to adult reef habitat[2]<sup>2</sup>.* This will be done building from earlier spatial algorithms that estimate the strength of inter-habitat connectivity[3]<sup>3</sup>, [4]<sup>4</sup>, and adapting them for differences in tidal ranges that strongly influence the degree to which mangroves provide a stable nursery habitat[5]<sup>5</sup>. These algorithms highlight which coastal areas provided the strongest benefits and which offshore reefs experience these benefits. Such information helps identify corridors of connected habitat that may be considered for shared protection.

? **Activity 3.2.1.c** *Use simulations of fish and coral larval dispersal on ocean currents to estimate the connections among reefs.* The use of such Lagrangian oceanographic models with particle tracking is more comprehensive and cost-effective than evaluating genetic connectivity, though comparisons between approaches have generally found good levels of agreement[6]<sup>6</sup>, [7]<sup>7</sup>. Data on larval dispersal pathways can be instrumental in identifying sites that lend themselves to either biodiversity conservation or the replenishment of fisheries. For the latter, the project will focus on sites that are 'self-reliant' and not dependent upon larval resupply from unprotected locations, and then identifying locations that supply key fishing grounds with new larvae. Building the source populations of these sites, through MPAs can help rebuild fisheries[8]<sup>8</sup>. Similarly, it is possible to take advantage of coral dispersal pathways to identify sites that play an exceptional role in helping other reefs recover after heatwaves or local damage[9]<sup>9</sup>. Such information supports the building of resilience plans that helps ecosystems 'and the people using them' adapt to climate change. Major coral sources might be targeted for additional monitoring, protection from pests like crown-of-thorns starfish, or prioritized for restoration if damaged[10]<sup>10</sup>. The use of 'seascape connectivity' models at these three hierarchical levels allows the consequences of alternative management scenarios to be compared.

? **Activity 3.2.1.d** *Simulate alternative MPA design options and evaluate their impacts.* To communicate MPA designs and obtain support from stakeholders, continuous stakeholder

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consultations as well as communication, education and public awareness (CEPA) programmes will be conducted throughout project duration. These will be done through workshops, focus group discussions, seminars and face-to-face interviews. Such stakeholder engagements will be aided using community mapping tools, created under an earlier GEF project, Capturing Coral Reef Ecosystem Services. Specifically, an iPad-based app 'Sesame' has been developed to help people map the resources, activities, and threats in their local environment (ccres.net). Regular meetings will be held with decision makers at state levels to discuss establishment of MPAs and proposed management regimes for the whole stretch of East Coast Peninsular Malaysia.

**RESPONSE: We would like to clarify the activities under Outcome 3.3.1:**

**Tentative Activities**

? *Activity 3.3.1.a Demonstration of a participatory monitoring program for Malaysian coral reefs and its use for identification of resilient reef areas.* Through a collaboration with the citizen science organization, Reef Check Malaysia, a review will be undertaken of resilience assessment methodologies<sup>[11]</sup> (Lam et al. 2020). Resilience methodologies consider ecological and social metrics relating to coral reefs. Through workshops that include invited experts, the project will select priority metrics and appropriate monitoring strategies. Other activities include a review of the status of existing resilient reef areas and identifying additional areas. This activity will be implemented in MPAs, proposed MPAs, and in strategically important areas such as reefs that provide critical stepping stones of connectivity among MPAs. These datasets are important for operationalizing resilience-based management planning. Specifically, we will be able to assess where resilience is likely to be high, where and why resilience might be impeded, and what interventions might be suitable for improving resilience. The concept of resilience here embraces both the ecosystem and its biodiversity as well as the social resilience of dependent communities.

? *Activity 3.3.1.b Creation of a tool that estimates the fisheries benefits expected from MPAs.* Here, local monitoring data, estimates of fishing pressure, and the connectivity of MPAs to fished areas will be integrated to help planners anticipate the expected benefits of MPAs. This tool will help managers optimize their design and biomass targets for MPAs in order to improve fishery benefits. These activities support the element of Outcome 3.3.1 that speaks to reducing fishing pressure; it reveals how a reduction in fishing pressure is likely to improve fishery benefits

Thank you for pointing out the confusion with the **activity under 3.3.1 being identical to that under 3.3.3**. This was an error. We have corrected the text under 3.3.1 as indicated above, and the activities under 3.3.3. remain as follows:

**Tentative Activities:**

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? **Activity 3.3.3a** *Incorporate resilience-based management planning and resilience assessment methodology into marine spatial planning system/guideline*

? **Activity 3.3.3b** *Develop resilience strategy to provide guidance on managing marine resources across East Coast Peninsular Malaysia.*

? **Activity 3.3.3c** *Capacity building on resilience principles among multiple stakeholders (agencies, students, and local communities).*

**Response to 3:** Thank you for the comment and we agree with the suggestion. It is important to clarify that the mapping will be done through local consultations, using tools previously developed by the GEF-CCRES project (e.g. Sesamme tool, which is a mapping tool to help people map values, threats, and activities). The scenarios being developed will be looking at ecological resilience, where people have a high dependence on natural resources - social considerations will be fully integrated into the process. The socioeconomic maps will also include information related to fishing areas and fishers socioeconomic profiles. Local communities in these areas will be engaged and actively participate in these processes and using these tools.

The budget for the mapping is budgeted under ?Workshops to map physical and social data? which will be mainly focused on socioeconomic data collection and analysis.

**RESPONSE to 4:** We apologize for the confusion. At one of the final PPG workshops it was decided that the project might adopt the term MMA rather than MPA because of the language preferred by several fisheries department in the region (which have adopted the concepts of MMAs, which may, or may not, incorporate areas officially designated as fully protected, and the two terms are sometimes used interchangeably. To ensure accuracy and consistency, in line with the indicators and the biodiversity focus of Component 3, we now use the term MPA throughout this section.

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[1] Dunn et al, 2019. The importance of migratory connectivity for global ocean policy. *Proceedings of the Royal Society B-Biological Sciences* **286**.

[2] Mumby et al, 2004. Mangroves enhance the biomass of coral reef fish communities in the Caribbean. *Nature* 427:533-536.

[3] Mumby, P. J. 2006. Connectivity of reef fish between mangroves and coral reefs: Algorithms for the design of marine reserves at seascape scales. *Biological Conservation* 128:215-222.

[4] Edwards, H. J., I. A. Elliott, R. L. Pressey, and P. J. Mumby. 2010. Incorporating ontogenetic dispersal, ecological processes and conservation zoning into reserve design. *Biological Conservation* 143:457-470.

- [5] Igulu et al, 2014. Mangrove habitat use by juvenile reef fish: Meta-analysis reveals that tidal regime matters more than biogeographic region. Plos One e0114715.
- [6] Foster et al, 2012. Connectivity of Caribbean coral populations: complementary insights from empirical and modelled gene flow. Molecular Ecology 21:1143-1157.
- [7] Riginos, C., K. Hock, A. M. Matias, P. J. Mumby, M. J. van Oppen, and V. Lukoschek. 2019. Asymmetric dispersal is a critical element of concordance between biophysical dispersal models and spatial genetic structure in Great Barrier Reef corals. Diversity and Distributions 25:1684-1696.
- [8] Krueck et al, 2017. Incorporating larval dispersal into MPA design for both conservation and fisheries. Ecological Applications 27:925-941.
- [9] Mumby, P. J., R. A. B. Mason, and K. Hock. 2021. Reconnecting reef recovery in a world of coral bleaching. Limnology and Oceanography: Methods lom3.10455.
- [10] Hock, K., N. H. Wolff, J. C. Ortiz, S. A. Condie, K. R. N. Anthony, P. G. Blackwell, and P. J. Mumby. 2017. Connectivity and systemic resilience of the Great Barrier Reef. PLoS Biology 15:e2003355.
- [11] Lam et al, 2020. Resilience Concepts and Their Application to Coral Reefs. Frontiers in Ecology and Evolution 8:49: 41-14.

### 3. Project Description Overview

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

Secretariat comment at CEO Endorsement Request (Karrer, Fairbank, Sapijanskas, July 12, 2022). Yes

### Agency Response

#### 4. Project Outline

##### A. Project Rationale

- a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?
- b) Have the role of stakeholders, incl. the private sector and local actors in the system been

described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?

c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?

Secretariat comment at CEO Endorsement Request

(Karrer, Fairbank, Sapijanskas, July 12, 2022). Yes

Agency Response

#### **5 B. Project Description**

**5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?**

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

**c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?**

**d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?**

**e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?**

**f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?**

**g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?**

**h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?**

**i) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?**

**j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?**

**k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?**

**l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?**

Secretariat comment at CEO Endorsement Request

(Karrer, April 2023) Yes.

(Karrer, Fairbank, Sapijanskas, July 12, 2022). No. Please ensure the budget has allocated 1% to IWLEARN activities.

### Agency Response

This was indicated in Tentative Activity **Activity 4.1.3a** *Facilitate participation of project stakeholders to the IW Learn annual meetings (budget allocated is 1 % of the IW budget).*

It has now been indicated as part of the KM section, as well as in the budget.

### **5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project**

**a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**

**b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**

**c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**

### Secretariat comment at CEO Endorsement Request

(Karrer, Nov 26, 2022). Yes.

(Karrer, Fairbank, Sapijanskas, July 12, 2022). No.

In terms of coordination with other projects, there is reference to the Fish Refugia project contributing to Component 3. It would seem that Component 3 of this project, which will provide analysis of priority areas, would also contribute to the Fish Refugia project.

Agency Response Please note that the Fisheries Refugia will close in December 2022 ? therefore, it is only expected that this project will integrate the knowledge of the Fisheries Refugia project, but it won't be possible the other way around. However, the project will coordinate closely with the SCS-SAP implementation project.

### **5.3 Core indicators**

**a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?**

**b) Are the project's targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) /adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?**

### Secretariat comment at CEO Endorsement Request

(Sapjanskas 1, 1& 3, April 2003 ). No

Previous comments 0, 1 & 3 were partially addressed (see email with visuals):

0- The WDPA IDs are missing for 4 of the 5 clusters of MPA, which we understand are each a single management unit, in the core indicator table of the portal entry. While we note they are included in the METT tracking tool uploaded in the portal, please also make sure that, for each cluster, the WDPA IDs of all MPAs included in that cluster are reflected in the core indicator table of the portal entry.

1&3) Thank you for the revisions to the Results Framework. However, the Results Framework includes METT baseline scores and targets for only 4 of the 5 clusters of MPA considered. Please add the Perhentian cluster.

(Sapjanskas 1& 3, Nov 28, 2022; Omid 0, Dec 6, 2022). No

0) The agency has indicated that ?the WDPA IDs under the core indicator 2 the WDPA codes cannot all be entered in the portal? and thus has provided them in the description box below the core indicator table. Requesting ITS to address this. Enter in the core indicator table.

1 & 3) It is well noted that at this stage, given the many MPAs targeted by the project and challenges faced during PPG, METT baseline assesment have only been carried out at the scale of groups of MPAs that share a common management administration.

However, please clarify whether each of these 5 clusters of MPAs is a single management unit in practice (i.e. has a single management plan, management board, budget, etc. for the whole cluster).

If not, please:

- carry out separate METT assessments for each MPA during implementation, noting, for this project, the METT scores provided at cluster level can be used for the purpose of baselining at CEO endorsement request stage.
- create one line per MPA in the core indicator table in the portal (under core indicator 2.2).
- Add target METT score increases at project mid-term and completion for each MPA in the Results framework.

Please also correct the Results Framework, which still includes ?baseline METT analysis for key MPAs? as a mid-term target, when baseline METT scores are to be provided at CEO endorsement request stage. The Results Framework should include target METT score increases at project mid-term and completion for existing MPAs that will received project support. (see image sent by email)

5) The fisheries-related target on CI8 and CI5.1 are significantly lower than at PIF. While it is justified for CI8, it is not clear for 5.1. Please provide an explanation.

(Karrer, Fairbank, Sapijanskas (1-5), July 12, 2022). No.

- 1.) Please upload the METT tracking tools with the baselines for CI 2.2 (existing PAs)
- 2.) Provide explanation on how the targets were derived, including core indicator 11, under table F.
- 3.) Core indicator 2: the baseline METT score is required at CEO endorsement stage for each protected area reported in the core indicator, as well as a target improved METT score at the end of the project. We note that the Result Framework states "The METT scores of existing MMAs are uncertain and in need of update." The agency is invited to consult GEFSEC if it foresees difficulties in obtaining the METT scores for all protected areas.
- 4.) Core indicator 5: There is a typo in the portal entry. The target should be 4 million ha to be consistent with the rest of the project documentation.
- 5.) The target is missing at CER stage for core indicator 8 in the portal entry. Please correct.

#### Agency Response

##### **Response FAO**

**On the WDPA IDs:** The revised table with the WDPA IDs have been included for the 5 clusters

**On the Results Framework:** The revised version of the Results Framework includes all 5 clusters

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##### **Response to comments made on 6 Dec 2022**

1&3) Yes, this is to confirm that these 5 clusters of MPAs are under a single management unit (single management authority and management board), and therefore the values are the same for the MPAs under each cluster. The targets for the METT scores at mid-term and final targets have been included after consultation with Malaysia.

5) For Core Indicator 8 ? the indicator has been revised based on updated data published by the Sea Around Us Project (SAUP). The updated SAUP catch-status plots estimated that 41% of the stocks and 23% of the GoT catch was over-exploited in 2018= 420,000 tonnes.

Rebuilding 75% of this amount = 315,000 tonnes. The total catch of the GoT is estimated to be around 1.83 million tonnes in 2019, based on the data gathered during the PPG phase.

For Core Indicator 5 ? during PPG consultations it was agreed that full MSC certification of a fishery in the GoT it is not realistic, and that the focus will be put into achieving at least 2 successful Fishery Improvement Programs (including one with the Marine Trust focused on fishmeal). The targets were then adjusted accordingly.

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**Response to 1:** After extensive discussion with the Malaysian government, based on the fact that a number of MPAs are managed as different clusters by one management authority, METT Scores have been developed for each of the five cluster of MPAs that are under the same management authority. These scores have now been incorporated into the Project Document Core Indicators, and the METT score Excel sheet has been uploaded.

**Response to 2**

The explanation on how the targets were derived has been included under table F as requested, and it is indicated here below for easy reference:

The project will contribute to the GEF Core Indicators 2, 5, 7, 8 and 11.

**Core Indicator 2 ? Marine protected areas created or under improved management for conservation and sustainable use** (Hectares) = 240,604 ha

- **RESPONSE:** This area was estimated by Malaysia DoF based on the group of MPAs contained in the project site area and is the estimate of the MPAs that will be under improved management effectiveness. The specific details of the MPA area considered is provided under Annex F and this value has been slightly modified to account for the overlapping of area between island based MPAs and turtle protection water corridors. The METT Scores have been re-organized under a cluster of MPAs that are under the same management authority.

**Core Indicator 5 ? Area of marine habitat under improved practices (excluding protected areas)** (Hectares) = 4 million ha

- **RESPONSE:** The area under this Core Indicator was estimated at PIF stage, based on the area resulting on improved practices based on the project and under EAFM plans ?consultation with the countries during the PPG phase indicates that this area is realistic in terms of goals, based on a regional EAFM and the scope of national EAFM that will be developed by the countries. Since the total area to be covered by the EAFM planning is estimated to cover least 12 million ha, it is expected that the project will achieve a target at least one third of the area ? therefore the estimated value is 4 million ha ? which will be selected



based on high level priority from the perspective of biodiversity (though not areas covered under MPA, since they will be under Core Indicator 2) and cross border management.

**Core Indicator 7 - Number of shared water ecosystems (fresh or marine) under new or improved cooperative management =1**

- **RESPONSE:** The project will be working in the GoTFish LME, discussing and agreeing on options for new and improved cooperative management among the four GoT countries.

**Core Indicator 8 ? Globally over-exploited marine fisheries moved to more sustainable levels (metric tonnes) = 315,000 tonnes**

- **RESPONSE:** Core Indicator 8 has been revised based on updated data published by the Sea Around Us Project (SAUP). The updated SAUP catch-status plots estimated that 41% of the stocks and 23% of the GoT catch was over-exploited in 2018= 420,000 tonnes. Rebuilding 75% of this amount = 315,000 tonnes. The total catch of the GoT is estimated to be around 1.83 million tonnes in 2019, based on the data gathered during the PPG phase.

**Core Indicator 11 ? Number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment = 120,000 fish-workers (50 % women)**

- **RESPONSE:** The total number of beneficiaries is an estimate based on the data provided by the countries during the PPG phase (Table 1 in the ProDoc, and summarized below). The targets assumes that the project activities will be able to reach up to almost 15 % of the fisher-folk population directly employed by, or benefiting from, the fisheries sector.

	Cambodia	Malaysia	Thailand	Viet Nam	Totals
Employment fisheries sector (number of people)	6,000,000	130,645	515,000	4,500,000	11,145,645
GoT (number of people) - <i>Estimate</i>	214,000	78,000	321,000	225,000	838,000

**Response to 3:** New METT scores have been done for the cluster of MPAs as noted earlier.

**Response to 4. :** this has been done.

**Response to 5:** This has been done.

**5.4 Risks**

a) Are climate and other main risks relevant to the project identified and adequately described (e.g. including these related to work in fragile locations and/or countries)? Are mitigation measures outlined and realistic? Is there any omission?

b) Are the key risks that might affect implementation and adequately rated?

c) Are environmental and social risks, impacts and management measures adequately assessed and rated and consistent with requirements set out in SD/PL/03?

## Secretariat comment at CEO Endorsement Request

(Sapijanskas, Nov 28, 2022) Yes.

(Sapijanskas, Nov 28, 2022) No.

1. Neither the portal entry nor the uploaded documents actually provide an explanation for the change in risk rating from High to moderate. Please provide an explanation in the portal entry.
2. Thank you for the addition, however, please also fill in the last column in the table of the portal entry (see image emailed)

(Karrer, Fairbank, Sapijanskas (all), July 12, 2022). No.

- 1.) Please upload the required safeguard documentation into the documents tab of the Portal. The current ESS document is from 2020 and is a Project Risk Certification that certifies the project as 'high risk' whereas the CER indicates moderate risk.
- 2.) It is unclear why the risk rating for the project has been downgraded from High/substantial at PIF to medium/moderate at CER. Particularly because this project includes both gazettement of protected areas and potential economic/livelihood displacement due to improvement in PA management which are customarily high-risk. Please ensure that required safeguard documentation includes a clear explanation and demonstration of the final risk rating for the project.
- 3.) The Risk Table in the CER does not include the risk and mitigation measures for both the gazettement of protected areas and potential economic/livelihood displacement due to improvement in PA management. Please include.

## Agency Response

### **Response to comments made on 6 Dec 2022**

1. The rating was considered 'High' during PIF stage because there was no information about the indigenous people at the time of developing the PIF, and there were activities that were carried out in the Marine Protected Areas. During PPG phase, an assessment of indigenous people in the Gulf of Thailand was carried out, which revealed that the project will not be working in areas of IP. In addition, the activities that will be carried out in MPAs are to improve the management of the MPAs. After revising this information, the FAO ESM unit has downgraded from High Risk to Moderate risk.

2. The last column in the table of the portal entry has been completed.

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1. and 2 The document explaining the change in risk rating has been uploaded. The FAO Environmental and Social Safeguards screening causes the project to be classified as high risk given the planned activities in and around protected areas. However, since the project aims to support the objective of the protected areas, the Environmental and Social Safeguards team of FAO has downgraded the risk to Medium Risk.

3. the risk has been included in the risk-table as suggested. It is indicated here below for easy reference.

<b>Description of the risk</b>	<b>Impact</b>	<b>Probability of Occurrence</b>	<b>Mitigation Actions</b>	<b>Responsible Party</b>
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<p>Improvement of MPA management and/or gazettement of new MPAs under Component 3 results in loss of access to current fishing grounds to small-scale fisheries and consequent loss of livelihoods or economic opportunities</p>	<p><b>High</b></p>	<p><b>Low</b></p>	<p>The project will improve the management of 35 MPAs on small islands on the east coast of Malaysia which are currently clustered into 4 groups.</p> <p>These islands are already under MPA listing and management measures apply, specifically to the prohibition of fishing activities within 2 nautical miles of the island constituting approximately 1,745.28km<sup>2</sup>. Improved management may include monitoring control and surveillance of these area to deter illegal fishing activities. Legitimate fishing would be unaffected. The islands are between 12-25km from shore and almost all lie outside of Malaysia's reserved area for small-scale fisheries (0-9.3km from shoreline) and are less accessible by small scale vessels and the fishing activity around them is primarily commercial vessels.</p> <p>In the case of the two newly gazetted MPAs, as the islands are quite small, the area that is estimated to be is 299km<sup>2</sup>. These islands also lie outside the reserved area for traditional fishing (SSF). Moreover, the intent is to consider how the MPA placement can help rebuild local fisheries, though there will be a delay of several years before such benefits are likely to occur.</p> <p>Finally, the tools that will be prepared under the project will be taking into consideration the potential displacement of fishers as part of the decision-making process and by making this a participatory and inclusive process, there will be better opportunities to take social and resilience issues into account, providing a higher chance of success</p>	<p>DOF Malaysia UQ RCU</p>
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**6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities**

**6.1 Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?**

Secretariat comment at CEO Endorsement Request (Karrer, Fairbank, Sapjanskas, July 12, 2022). Yes.

Agency Response

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

Secretariat comment at CEO Endorsement Request

(Karrer, Fairbank, Sapijanskas, July 12, 2022). Yes

Agency Response

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

Secretariat comment at CEO Endorsement Request (Karrer, Fairbank, Sapijanskas, July 12, 2022). Yes.

Agency Response

**7 D. Policy Requirements**

**7.1 Are the Policy Requirement sections completed?**

Secretariat comment at CEO Endorsement Request

Agency Response

**7.2 Is the Gender Action Plan uploaded?**

Secretariat comment at CEO Endorsement Request (Karrer, Fairbank, Sapijanskas, July 12, 2022). Yes

Agency Response

**7.3 Is the stakeholder engagement plan uploaded?**

Secretariat comment at CEO Endorsement Request

(Karrer, June 2023). Yes.

(Karrer, April 2023). No. Both the stakeholder matrix and the Stakeholder section in the CER do not explain how stakeholders will be engaged in the project. Please add.

(Karrer, Nov 28, 2022). No.

It seems that the table with the insufficient information (e.g. "review the issues and needs") has been inserted into the CER. There still is not sufficient explanation of how the stakeholders will be engaged. Please note what they will actually do.

(Karrer, Fairbank, Sapijanskas, July 12, 2022). No.

The Stakeholder Engagement Plan section provides a thorough list of stakeholders, but it's unclear how they will be engaged in the project. For example, the first few stakeholders or Cambodia note in the comments "Review the issues and needs", which is unclear. The implementation table (iv) is slightly better by noting the components related to the different stakeholders, but that still does not convey what they will do related to the project.

Agency Response

**Response FAO**

Thank you? we have revised this in the stakeholder matrix as requested

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**Response to comments made on 6 Dec 2022**

Apologies, seems a previous version of the Stakeholder Engagement Plan was submitted? a new one has been updated in the portal

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The Stakeholder Engagement Plan has been updated in the ProDoc and the engagement matrix is also uploaded in the Document section in the portal.

**7.4 Have required applicable safeguards documents been uploaded?**

Secretariat comment at CEO Endorsement Request

Agency Response

**8 Annexes**

**Annex A: Financing Tables**

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

**STAR allocation?**

Secretariat comment at CEO Endorsement Request

Agency Response  
**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request

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

Secretariat comment at CEO Endorsement Request

Agency Response  
**SCCF A (SIDS)?**

Secretariat comment at CEO Endorsement Request

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

Secretariat comment at CEO Endorsement Request

Agency Response  
**Focal Area Set Aside?**

Secretariat comment at CEO Endorsement Request

Agency Response  
**8.2 Project Preparation Grant (PPG)**  
**a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?**

Secretariat comment at CEO Endorsement Request  
(Karrer, Fairbank, Sapijanskas, July 12, 2022). Yes.

Agency Response  
**8.3 Source of Funds**  
**Does the sources of funds table match with the OFP's LOE? Note: the table only captures sources of funds from the country's STAR allocation**

Secretariat comment at CEO Endorsement Request

## Agency Response

**8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines? e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?**

## Secretariat comment at CEO Endorsement Request

(PPO April 2023). No.

a. The new IUCN support letter indicates \$1mil for co-financing ? also lacking a date. However, the co-financing table indicates two separate lines of co-financing from IUCN with amounts of \$11,172,000 and \$80,000. Please remove these two lines and adjust them accordingly as per IUCN new support of \$1,000,000.

b. This is not addressed: Malaysia Ministry of Agriculture & Food Industries public investment ? change ?Recurrent expenditures? to ?Investment mobilized? ? please also describe how any "Investment Mobilized" was identified.

c. This is not addressed: Thailand Ministry of Agriculture & Cooperatives public investment ? change ?Recurrent expenditures? to ?Investment mobilized? ? please also describe how any "Investment Mobilized" was identified..

(SJ Dec 6, 2022). No.

- Malaysia Ministry of Agriculture & Food Industries public investment ? change ?Recurrent expenditures? to ?Investment mobilized? ? please also describe how any "Investment Mobilized" was identified.

- Thailand Ministry of Agriculture & Cooperatives public investment ? change ?Recurrent expenditures? to ?Investment mobilized? ? please also describe how any "Investment Mobilized" was identified..

- IUCN: unable to locate a co-financing letter. Please submit.

## Agency Response

### **Response FAO**

a) The co-financing letter of IUCN has been changed to match with the amount reported in Table C.

b) Consistently with the letter of co-financing provided by the government, part of the commitment of Malaysia has been reported as investments mobilized. An explanation was



added at the end of table C, i.e.: *Malaysia's investment mobilized refers to the budget received by the Department from the Economic Planning Unit and budget allocated under the Marine Park and Marine Reserve Trust Fund to conduct approved projects and programmes.*

b) Consistently with the letter of co-financing provided by the government, the co-financing of the commitment of Thailand is reported as IN-KIND recurrent expenditures.

### **Response to comments made on 6 Dec 2022**

We have adjusted the co-finance for Malaysia, and information has been provided for the Investment mobilized.

Please note that the co-finance for Thailand is all in-kind

Apologies for the omission, the IUCN co-finance letter has been submitted to the portal

#### **Annex B: Endorsements**

**8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:**

**Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?**

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

#### **Annex C: Project Results Framework**

**8.6 a) Have the GEF core indicators been included?**

**b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of the budget (too high? Too low?)**

- c) Are all relevant indicators sex disaggregated?
- d) Is the Project Results Framework included in the Project Document pasted in the Template?

Secretariat comment at CEO Endorsement Request (Karrer, Fairbank, Sapijanskas, July 12, 2022). Yes

Agency Response

**Annex E: Project map and coordinates**

**8.7 Are geo-referenced information and maps provided indicating where the project interventions will take place ?**

Secretariat comment at CEO Endorsement Request (Karrer, Fairbank, Sapijanskas, July 12, 2022). Yes.

Agency Response

**Annex G: GEF Budget template**

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

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

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

Secretariat comment at CEO Endorsement Request

Agency Response

**Annex H: NGI Relevant Annexes**

**8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.**

**b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.**

**c) Is the Agency eligible to administer concessional finance? If not, please provide comments.**

Secretariat comment at CEO Endorsement Request

Agency Response

**Additional Annexes**

**9. GEFSEC DECISION**

**9.1.GEFSEC Recommendation**

**Is the project recommended for approval**

Secretariat comment at CEO Endorsement Request  
(Karrer, June 2023) Yes

(Karrer, Sapijanskas April 2023). No.

(Karrer, Fairbank, Sapijanskas, July 12, 2022). No

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

Secretariat comment at CEO Endorsement Request

**9.3 Review Dates**

	<b>CEO Approval</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	<b>7/12/2022</b>	
<b>Additional Review (as necessary)</b>	<b>11/28/2022</b>	
<b>Additional Review (as necessary)</b>	<b>5/2/2023</b>	
<b>Additional Review (as necessary)</b>	<b>6/8/2023</b>	
<b>Additional Review (as necessary)</b>		