

# Mainstreaming biodiversitybased tourism in Thailand to support sustainable tourism development

Review CEO Endorsement and Make a recommendation

## **Basic project information**

**GEF ID** 

10409

**Countries** 

Thailand

**Project Name** 

Mainstreaming biodiversity-based tourism in Thailand to support sustainable tourism development

Agencies

UNDP

Date received by PM

6/11/2021

Review completed by PM

1/14/2022

**Program Manager** 

Jurgis Sapijanskas

Focal Area

**Biodiversity** 

**Project Type** 

## PIF □ CEO Endorsement □

Part I? Project Information

Focal area elements

1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?

Secretariat Comment at CEO Endorsement Request JS 2/28/2022 - Cleared.

#### JS 2/10/2022

1- Since the project duration is 48 month, if the project is to start on 9/1/2022, the expected completion date should be 8/31/2026 and not 3/31/2026. Please correct.

2- Cleared, thank you.

3a- Cleared.

3b - Our understanding of Annex 7 is that the project manager is also the Senior Biodiversity-based Tourism Specialist so that the project manager is still charged across components under the name "Senior Biodiversity-based Tourism Specialist" in this new submission. The request was to charge the full position of "Project Manager/ Senior Biodiversity-based Tourism Specialist" to PMC instead of cross charging \$98,800 of "Project Manager/ Senior Biodiversity-based Tourism Specialist" to GEF funded components by using co-financed PMC to cover these \$98,800. Alternatively, please justify that the co-financing portion allocated to PMC (\$948,056) is fully utilized.

#### JS 1/21/2022-

1-Please revise the expected start and completion dates to realistic dates. Given the project will be circulated to GEF Council for a 4-week review, the project will not be able to start on 1/31/2022.

2- The budget table under Annex E is not entirely consistent with the budget shown in table B and in the ProDoc. The budget of components are all slightly different (Component 1:

\$334,100 vs \$336,000; component 2 \$1,463,566 vs \$1,476,526, etc.). Please make sure in the resubmission that budgets are fully aligned.

3- On the budget shown in Annex E (GEF template):

Expenditure Category

-3.a National Mid-Term and Terminal Evaluation Consultants appear charged both under Component 3 and in M&E. Please charge them entirely to M&E. We understand it is probably a typo and that they should not have been kept under component 3 in Annex E. Please double check the amounts and revise Annex E to reflect that these are fully charged to M&E

Detailed Description

Component 1

Component 2

Component 3

Sub-Total

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3b- Per Guidelines, the costs associated with the execution of the project (including project staff) have to be primarily covered by the GEF portion and the co-financing portion allocated to PMC. As it is unclear whether the co-financing portion allocated to PMC (\$948,056) is fully utilized, please charge the full position of Project Coordinator to

PMC instead of cross charging \$98,800 of project coordinator to GEF funded components by using co-financed PMC to cover these \$98,800. Alternatively, please justify that the co-financing portion allocated to PMC (\$948,056) is fully utilized.

6/22/2021- Table 1 is identical to that of the PIF, cleared.

## Agency Response 02/21/2022:

- 1. Thanks for pointing this out. The expected completion date has been changed to 8/31/2026 in the CER and the Portal.
- 3b. On Friday, February 18, 2022, BEDO confirmed that the co-financing portion allocated to PMC (\$948,056) is fully utilized (see Annex 12\_6441\_BEDO communication regarding PMC co-financing for details).

#### 02/02/2022:

- 1. The expected Project start and completion dates have been changed to September 2022 and March 2026 accordingly.
- 2. Component 1 and 2 budgets are aligned in ProDoc and Annex1, GEF Budget. It should be noted that there is a slight difference in Component 3 between ProDoc and Annex1, GEF budget for the portion of M&E component at the amount of USD 113,790. Reason is M&E component is merged to component 3 in ProDoc budget while it?s kept separate in the Annex 1, GEF budget. The total amounts are the same in both documents.
- 3. a) Both National Mid-Term and Terminal Evaluation Consultants are fully charged to M&E and budgets revised.
- b) Project Manager cost charged to PMC GEF resources and Co-financing portion of PMC only. The word ?Project Manager? was typo in the previous submission of Annex 1, GEF budget template and wrongly reflected in components 1, 2 and 3.

#### Project description summary

2. Is the project structure/design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?

#### Secretariat Comment at CEO Endorsement Request

JS 9/29/2021 - Cleared, thank you.

JS 6/15/2021

1- Former Output 2.3 ("Sustainable tourism standards and impact monitoring promoted and deployed across Prachuap Khiri Khan. This will take place through (i) reinvigoration of the existing government Green Hotel scheme and its broadening to cover biodiversity

conservation and embrace more tourism operators; and (ii) awareness-raising and training of provincial tourism officers, local governments, and local local tourism operators in avoiding, mitigating and monitoring tourism impacts.") planned at PIF stage has disappeared. The CER states that former output 2.3 and 2.4 were combined to simplify. However, as described in the ProDoc, activities under 2.3 do not include impact monitoring. More fundamentally, former 2.3 was one of the few project's contribution to "greening" tourism in general targeting a broader range of stakeholders, when former 2.4/current 2.3 are entirely related to developing "niche" green tourism and focus on local communities. It is unclear how the two could be combined and it is critical that the project keeps a strong contribution to greening unsustainable tourism (see comments on alternative scenario further down).

Please clarify how the outputs planned in PIF stage 2.3 are to be delivered or justify thoroughly the changes made, explaining how the project will still contribute to greening tourism in general, not just developing "niche" biodiversity-based tourism (see also comment on the alternative scenario further down).

The rest of the few changes made to table B are adequately justified and acceptable.

## **Agency Response**

UNDP 2021/08/14

In terms of project strategy, the Outputs under Component 2 seek to demonstrate the application of biodiversity mainstreaming in national tourism policies, strategies and plans (Component 1) at the provincial level consistent with the new thinking in the Bio-Circular-Green Economy (BCG) Strategic Plan 2021-2026 which consists of the following strategies and will focus on four sectors including tourism:

Strategy 1: Promoting sustainability of biological resources through balancing conservation and utilization.

Strategy 2: Strengthening communities and grassroots economy by employing resource capital, creativity, technology, biodiversity and cultural diversity to create value to products and services, enabling the communities to move up the value chain.

Strategy 3: Upgrading and promoting sustainable competitiveness of Thai BCG industries with knowledge, technology and innovation focusing on green manufacturing.
Strategy 4: Building resilience to global changes.

Further, the current National Tourism Development Plan (2017- 2021) recognizes ecotourism as one of the important tourism products that must be promoted. In addition, there is increasing recognition within Thailand that tourism controls and restrictions (including site closures) need to be put in place at heavily visited sites where tourism has damaged and/or degraded ecological assets. To align to Thai policy directions and reflect socio-ecological systems, the methodologies will also cover impacts of tourism on local communities, both negative and positive. This will provide an overall monitoring system for assessing both ecological and social benefits and impacts of tourism. This need for such monitoring tools comes from DNP, which has in principle committed to upscale adopted methodologies in national parks across Thailand. The methodologies are proposed for demonstration under Outputs 2.1, 2.2 and 2.3 in Prachuap Khiri Khan landscape. Impact monitoring is specifically required under Output 2.1 (for example, monitoring for compliance with the Strategic Environmental and Social Assessment [SESA] for provincial level tourism planning); and Output 2.2 (e.g. At Kui Buri and Khao Sam Roi Yot NPs,

implement the improved coordination between TAT and DNP to balance promotion and visitor management to avoid overtourism [Activity 1.1.1]. Use the Que Q application, monitoring actual visitor numbers to establish congestion levels, and use social media to reduce visitation and ensure adequate social distancing amid COVID-19).

Component 2 will contribute directly towards the greening of tourism in PKK Province. Output 2.1 notes that, in coordination with ONEP, a spatially-explicit SESA will be undertaken to identify key ecological assets and potential threats and impacts of tourism development and biodiversity-based tourism. A tourism master plan will be developed for the project landscape that is aligned with the SESA and biodiversity-based tourism strategy, as well as the BCG Economy Strategy (See Prodoc Annex 11c: Policy baseline analysis). The SESA, tourism masterplan and biodiversity-based tourism strategy?s action plan will address challenges of pollution, climate change and over-tourism (See also CER p16-17).

3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?

**Secretariat Comment at CEO Endorsement Request NA** 

## **Agency Response**

Co-financing

4. Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?

## Secretariat Comment at CEO Endorsement Request JS 1/4/2022 -Cleared.

We note the supporting letter from PTT, which confirms its support to the project along the lines detailed in the PRODOC even though no specific co-financing amount was secured at this stage. We further note that the development of a MoU with PTT is part of the project (activity 2.1.1).

## JS 10/25/2021 -

1 and 3. Thank you for the information. Please provide the PTT and MoTS co-financing letters with the next submission.

Please note the letter from BEDO confirming on-going exchanges was not uploaded with this submission.

#### JS 9/28/2021

1b- Thank you for the clarification and for this encouraging development. Please upload PTT's co-financing letter and update table C in the portal accordingly.

3- Thank you for the documents and English translation. The co-financing from the Ministry of Natural Resources and Environment? Dept of Nat Parks, Wildlife & Plant Conservation; the Ministry of Natural Resources and Environment? Dept of Marine & Coastal Resources; and the Ministry of Natural Resources and Environment? Royal Forest Dept are cleared.

However, the translation of the co-financing letter from the Ministry of Tourism and Sport shows a total of ca. 23 million Thai Baht, i.e. is less than \$700,000, when the co-financing reported from that Ministry is \$2,800,000 in the GEF portal. Moreover, this co-financing letter mentions budgets for 2021 and 2022, when this project proposed for CEO endorsement will only start in 2022, so that most of the co-finance mentioned in that letter cannot be counted. Please provide an adequate co-financing letter to support the co-financing reported in table C.

## All the rest is cleared, thank you.

JS 6/15/2021- Total cofinancing is in line with that presented at PIF stage with a ratio of 1:7.5.

1- However, we note that there is no cofinancing from the private sector contrary to PIF stage where \$1.4 million from PTT and tourist operators/companies were envisaged. The CER explains that cofinancing from the tourism sector have not yet materialized because of COVID constraints but that (i) letters of support from Tourism Association of Prachuab Khiri Khan, Community-based Tourism of Prachuab Khiri Khan Association, and the Thai Responsible Tourism Association were obtained, and (ii) corresponding co-financing will be revisited during the course of the project.

1a-Please clarify where the letters of support (i) have been uploaded.

1b-Please also clarify why the anticipated co-financing by PTT, which does not depend upon tourism, has not been secured when a strong role is given to PTT in the project design (Member of Steering Committee, support to implementation of component 2 through the SRE Learning Center and other related programmes within PTT).

2 Some in-kind co-financing is reported as investment mobilized (IM) when it should be recurrent expenditures:

Government	Parks, Wildlife & Plant Conservation	Investment	mobilized	
Recipient Country Government	Ministry of Natural Resources and Environment – Dept of Nat Parks, Wildlife & Plant Conservation	In-kind	Investment mobilized	3,746,656.00
D:-:	Ministra of New and December and Farmaness of December	Dulette.	1	40.07.7.00

#### Please correct.

3 Supporting information for the co-financing from (i) Dept of Nat Parks, Wildlife & Plant Conservation, (ii) Dept of Marine & Coastal Resources, (iii) Royal Forest Dept, (iv) Ministry of Tourism and Sports is provided in the form of a letter from BEDO, which, as we understand it, has no authority over these departments and ministry. Please provide co-financing letters from the co-financers, not from the EA.

#### **Agency Response**

#### UNDP 2021/12/28

- 1.b After several meetings and exchanges between BEDO, UNDP and PTT, PTT provided the attached letter of support to the project. In this letter they request more time to observe internal processes and fulfil legal requirements, including the need to sign a MOU between PTT and BEDO, before PTT can provide a co-financing letter to the project. The expectation is that, after meeting PTT requirements, the co-financing letter will be shared during the first year of implementation of the project.
- 3. Please see attached the revised letter from MOTS (in Thai with English translation) that fully meets GEF?s requirements Also, please note that the figure of co-financing from MoTS in the GEF portal has been adjusted to match the current co-financing letter.

#### UNDP 2021/10/20

- 1.b UNDP and BEDO have arranged to meet with PTT management by the end of October in order to secure this cofinancing letter, The expectation is that the letter will be shared before the CER deadline.
- 3. UNDP has worked with BEDO to obtain a revised cofinancing letter from MoTS that fully meets GEF?s requirements. Please see the attached letter from BEDO confirming this; the actual cofinancing letter from MOTS will follow before the CEO Endorsement deadline. Also, please note that the figure of cofinancing from MoTS in the GEF portal has been adjusted to match the current cofinancing letter. This figure will be updated as soon as the revised cofinancing letter from MoTS is secured.

#### UNDP 2021/08/14

- 1.a The letter of support from Tourism Association of Prachuab Khiri Khan is uploaded to GEF Portal
- 1.b There has been staff turnover lately in the PTT that too at the senior management position level. The EA (BEDO) and UNDP has been in discussion and coordinating with PTT?s new management to secure the co-financing letter. UNDP will be able to submit the co-financing letter in the next round of feedback from GEF SEC.
- 2. This has been corrected in the portal. The in-kind co-financing is now reported as recurrent expenditures.
- 3. The original individual signed letters in Thai language and the corresponding translated versions in English have been uploaded to the portal.

**GEF Resource Availability** 

5. Is the financing presented in Table D adequate and does the project demonstrate a costeffective approach to meet the project objectives? Secretariat Comment at CEO Endorsement Request  $\rm JS~6/15/2021$  -  $\rm Yes,$  cleared.

## **Agency Response**

**Project Preparation Grant** 

6. Is the status and utilization of the PPG reported in Annex C in the document?

## **Secretariat Comment at CEO Endorsement Request**

JS 9/28/2021 - Cleared.

JS 6/15/2021:

Please correct the typo in Annex C:

Project Preparation Activities Implemented	GE1				
Project Preparation Activities Implemented	Budgeted Amount				
Component A: Preparatory Technical Studies & Reviews	36,667				
Component B: Formulation of the UNDP-GEF Project Document, C EO Endorsement Request, and Mandatory and Project Specific Ann exes	33,333				
Component C: Validation Workshop and Report	30,0000				
Total	100,000.00				

The rest is cleared.

## **Agency Response**

UNDP 2021/08/14

The entry has been Revised to \$30,000 as requested

**Core indicators** 

7. Are there changes/adjustments made in the core indicator targets indicated in Table E? Do they remain realistic?

**Secretariat Comment at CEO Endorsement Request** 

JS 1/13/2022 - All cleared.

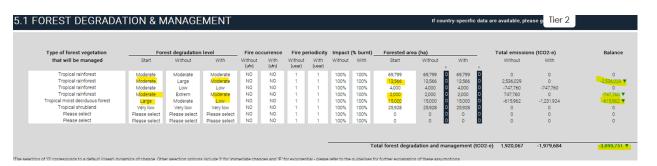
JS 1/4/2022

Thank you for the response, which is acceptable, but the mitigation targets do not seem to have been updated in this submission. The portal entry, PRODOC and annexes, including the EX-ACT calculations

(Annexesappendixestotheprojectdocuments PIMS6441Annex19BEXACT2ndresubmission2 8-12-2021.xlsx) ) do not reflect the changes made in the screenshots provided in your response in this review sheet. What has been submitted is:

#### 7.1.3 Rewetting & revegetation Percentage of nominal biomass restored Type of vegetation Area rewetted (ha) Without With Without Mangrove 0 1,000 0% 0% D 0% Mangrove 1,500 1,500 0% Tidal marsh 0 D 208 0% D 0 0 0% Mangrove 0% Mangrove 0 0 0% 0% Please select 0% 0%

\*The selection of "D" corresponds to a default (linear) dynamics of change. Other selection options include "I" for immediate changes and "E" for exponential - please re



Similarly, the mitigation target is still 3.88 million tCO2eq in table F, in the project results framework and in annexes 19 A & 19 B when the response below states it was revised down to *ca.* 2 million tCO2eq.

Please correct.

JS 10/27/2021 -

In this resubmission, mitigation benefits of 3.88 million tCO2eq are to be obtained thanks to:

Fore	st degradation le	evel	Fire occ	urrence	Fire per	iodicity	Impact (	% burnt) _	Forested
Start	Without	With	Without (y/n)	With (y/n)	Without (year)	With (year)	Without	With	Start
Moderate	Moderate	Moderate	NO	NO	1	1	100%	100%	69,799
Moderate	Large	Moderate	NO	NO	1	1	100%	100%	13,566
Moderate	Low	Low	NO	NO	1	1	100%	100%	4,000
Moderate	Extrem	Moderate	NO	NO	1	1	100%	100%	2,000
Large	Moderate	Low	NO	NO	1	1	100%	100%	15,000
Very low	Very low	Very low	NO	NO	1	1	100%	100%	25,928
Please select	Please select	Please select	NO	NO	1	1	100%	100%	0
Please select	Please select	Please select	NO	NO	1	1	100%	100%	0

- (1) constant level of moderate forest degradation over 15,566 ha compared to shift to more severe degradation under the BAU with the project;
- (2) improvement of the state of 15,000 ha, recovering from large degradation level to low degradation level with the project compared to moderate degradation level in the BAU.
- (3) According to the EX-ACT calculations, these benefits are partly compensated by net emissions (16,520 tCO2eq) due to rewetting of 1,208 ha of mangroves and tidal marshes.

#### (1) seems reasonable.

On (2), given the project's interventions, it is unclear how the state of 15,000 ha of forests would be improved from a large degradation level (which is -60% of tCO2/ha compared to nominal undegraded forest in the tier 1 values used in EX-ACT) to low degradation level (-20% of tCO2/ha compared to nominal undegraded forest). Note that the EX-ACT calculation here corresponds to a doubling of the quantity of carbon in these 15,000 ha of forests over 20 years. Please justify or revise to a more conservative estimate.

On (3), the way EX-Act calculations have been carried out assumes that all the work in mangroves and tidal marsh result in net emissions with the project because only "rewetting" in EX-ACT terminology (i.e. restauration of hydrology and/or water quality) have been inputted in the EX-ACT tool (see below). If, as we understand it, the project is to lead to the restoration of mangrove vegetation, please enter corresponding estimates under "nominal biomass restored" (Please refer to EX-ACT manual and guidelines for blue carbon):

Type of vegetation	Area rewette	ed (ha)	_	Percentage of nominal biomas	ss restore
	Without *	With	*	Without	With
Mangrove	0 D	1,000	D	0%	0%
Mangrove	1,500 D	1,500	D	0%	0%
Tidal marsh	0 D	208	D	0%	0%
Mangrove	0 D	0	D	0%	0%
Mangrove	0 D	0	D	0%	0%
Please select	0 D	0	D	0%	0%

1-4 Cleared, thank you. (On 3, this time, the baseline METT does appear under core indicator 2 on GEFSEC side in the portal entry as well).

5- Thank you for the addition of the core indicator 6 target and the assumptions and EX-ACT calculation provided as annex 19. We note that mitigation results come from the assumption of less severe forest degradation in 30,566 ha, partly compensated by (i) an increase in forest degration over 4,000 ha because of the project, and (ii) emissions due to the rewetting of 1,208 ha of wetlands as a result of the project.

Please clarify why the EX-ACT calculation assumes that (i) there is no effect of the project on 95,727 ha of forests, and (ii) there is more degradation with the project on 4,000 ha of tropical rainforest than without the project:

Type of forest vegetation	Fore	st degradation le	evel	Fire occ	currence	Fire per	riodicity	Impact (	(% burnt)	Forest
that will be managed	Start	Without	With	Without (y/n)	With (y/n)	Without (year)	With (year)	Without	With	Star
Tropical rainforest	Moderate	Moderate	Moderate	NO	NO	1	1	100%	100%	69,79
Tropical rainforest	Moderate	Large	Moderate	NO	NO	1	1	100%	100%	13,56
Tropical rainforest	▼ Moderate	Low	Moderate	NO	NO	1	1	100%	100%	4,00
Tropical rainforest	Moderate	Extrem	Moderate	NO	NO	1	1	100%	100%	2,00
Tropical moist deciduous forest	Large	Moderate	Low	NO	NO	1	1	100%	100%	15,00
Tropical shrubland	Very low	Very low	Very low	NO	NO	1	1	100%	100%	25,92
Please select	Please select	Please select	Please select	NO	NO	1	1	100%	100%	0
Please select	Please select	Please select	Please select	NO	NO	1	1	100%	100%	0

Please also clarify why there is no anticipated climate mitigation results stemming from avoided land use change or from avoided mangrove degradation.

Finally, please place a short summary of these underlying assumptions (number of hectares of forest with lower degradation thanks to the project, etc.) under table F of the portal entry.

#### JS 6/15/2021

- 1- Khao Sam Roi Yot (WDPA ID 939) is reported as 2285 ha in the WDPA while in this submission it is reported as 13,567 ha of terrestrial area and 2,281 ha of marine area. Please confirm that these surface area are correct and that you will go through the process of correcting the corresponding WDPA entries during project implementation.
- 2- Same question for Kui Buri National Park(WDPA ID 312949): the surface area in the WDPA is 96,900 ha when it is reported as 99,518 ha in this submission. Please confirm that these surface area are correct and that you will go through the process of correcting the corresponding WDPA entries during project implementation.
- 3- Please add the baseline METT score for Khao Sam Roi Yot under core indicator 2 as well. As agreed at PIF stage, please use the same METT score for both marine and terrestrial part of the PA, i.e. conduct only one METT but report twice the score under core indicator 1 and 2:

Name of the Protected Area	WDPA ID	IUCN Category	Total Ha (Expected at PIF) <b>3</b>	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE) 😉	METT score (Baseline at GEO Endorsement)	METT score (Achieved at MTR)	METT score (Achieved at TE)	
Khao Sam Roi Yot National Park	939	National Park	2,088.00	2,281.00				/		ť

- 4- The PIF-stage 1,000 ha target on core indicator 4.1 was a clear underestimate. While the project can likely not claim <u>direct</u> effect on practices over the full province, even if a provincial tourism masterplan will be developed, 17,208 ha still seems relatively low. Please clarify how the 17,208 ha target was derived (which specific project activities will target specifically these 17,208 ha but not the larger landscape?) and consider revising upward.
- 5- The Rio Marker for Mitigation has been set to 1 but there is no mitigation target (core indicator 6). Please provide a target on core indicator 6 and explain the methodology used.

## **Agency Response**

#### UNDP 2022/01/6

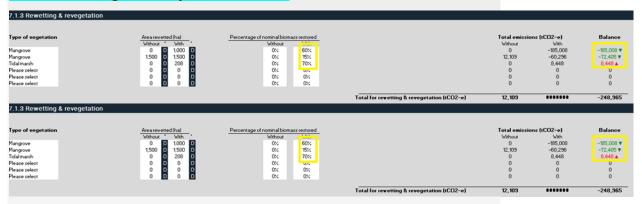
The GHG reduction estimations have been adjusted to EOP 2,265,238 tCO2-e in all relevant sections of the CER and ProDoc and the correct version of Annexes 15, 19a and 19b have included in this resubmission.

#### UNDP 2021/12/28

(2) Point well taken. Given that forest cover in 15,000 ha is existing forest stands (with observed varying degree of large degradation), it cannot be assumed that the carbon sequestration will double from these forest stands in 20-year period. Therefore, the estimates have been revised. Briefly, 14,000 ha is expected to show improvement in forest conditions (from large to moderate degradation) through natural ecological succession, this is expected to be same with or without the project interventions. However, as a result of project interventions, estimated 1,000 ha will show improvement in forest conditions to moderate from large degradation, which otherwise is expected to remain in its current condition. Hence, increased carbon sequestration from forest stands covering 1,000 ha is accounted as GHG benefit from the project. Further, other inputs in the module also have been revised based on the assumption discussed above. Consequently, the total GHG benefit from the roject is now estimated at approximately 2.12 million tCO2eq. Please see the changes made in yellow boxes below:



(3) The project plans rewetting activities (i.e. some hydrology restoration and reseeding or replanting, details to be determined during implementation phase) at the sites. Based on various studies on mangrove restoration project success rate (e.g. Ocean Wealth study report), value of 60% for ?nominal biomass restored? is assigned for 1,000 ha of new area that will see mangrove replanting or reseeding. Another 1,500 ha of existing mangrove will benefit from improved hydrology, where 15% of ?nominal biomass restored? is expected. Please see the changes made in yellow boxes below:



## UNDP 2021/10/20

5.

(i) There is no effect of the project on 95,727 ha of forests. This forest lies within existing PAs and is therefore protected? the project will not aim to rehabilitate this forest (as it focuses on tourism management) therefore significant change in condition is not anticipated, while at the same time it is assumed that these areas - due to the project - will not further degrade.

(ii)There is more degradation with the project on 4,000 ha of tropical rainforest than without the project: It was assumed that, despite best efforts, the forest could see some degradation from natural ecological process (outside of natural disaster and anthropogenic impact). This has now been revised as suggested and key assumptions have been updated.



See corrected version below:



Please also clarify why there is no anticipated climate mitigation results stemming from avoided land use change or from avoided mangrove degradation.

113,085 ha of forested land lies within Kui Buri NP and Khao Sam Roi Yot NP? therefore land use change within these parks is not anticipated.

An estimated 17,208 ha of Pran Buri Estuary (including Pak Nam Pran, Sam Roi Yot coastal and wetland areas) through improved landscape management by implementing activities to reduce negative pressures on the landscape (e.g. nature-based tourism practices, developing tourism masterplan, visitor plans, reduce human-wildlife conflicts, promoting certified nature friendly tourism practices, etc.). It is assumed that as a result of these approaches (over 20 years) an estimated 1,000 ha of degraded mangrove and 208 ha of degraded tidal marsh will be revegetated (through natural regeneration). Rewetting is NOT assumed. See below.

Type of vegetation	Area rew	ette	d (ha)	
	Without	•	Mith	-·
Mangrove	0		1.000	D
Mangrove	1,500		1,500	D
Tidal marsh	0	D	208	D
Mangrove	0	D	0	D
Mangrove	0	D	0	D D
Please select	0	D	0	D

ype of vegetation	Area rewetted (ha)
	Without With
langrove	0 <b>0</b> 1.000 <b>0</b>
langrove	1,500 D 1,500 D
idal marsh	0 10 208 10
langrove	
langrove	0 0 0
lease select	0 0 0

Finally, please place a short summary of these underlying assumptions (number of hectares of forest with lower degradation thanks to the project, etc.) under table F of the portal entry.

Revised key assumptions are included in the attached GHG estimate (Annexes 19a and 19b). The project is expected to improve forest conditions over a total of 30,566 ha and it will avoid further degradation or condition maintain current forest conditions over a total of 95,727 ha.

See revised figures for Core Indicator 6 in section 6 of the CER, Project Results Framework of the ProDoc (page number 70) and revised Annex 4 (monitoring plan), as well as Annexes 19a and 19b (GHG estimates) of the ProDoc.

#### UNDP 2021/08/14

- 1. A) The WDPA data for KSRY NP only covers the marine PA, it does not include the terrestrial area. UNDP has checked with both KSRY NP and the Regional Protected Area 3 (Petchaburi) office who supervise both KSRY and Kui Buri NP. They confirmed the updated areas were 13,567 ha (terrestrial) and 2,281 ha (marine) for KSRY NP.
- B) KSRY NP commented that the area stated in the decree for the NP is not the same as the updated area because of the increased accuracy of GIS technology used for recent

mapping. Therefore, the area currently used by DNP is the number provided in the ProDoc and the shapefiles provided.

- C) Regarding the process of correcting the corresponding WDPA entries, the PMU will coordinate with the related government department to correct the data in WDPA during project implementation. BEDO have been informed about this issue.
- 2. A) This case is more complicated than for KSRY NP because there is an additional extension area in the north of the NP, which is currently under the process of designation through a new government decree. DNP are unable to state when the new decree for Kui Buri NP will be released.
- B) UNDP has checked the updated information from the DNP Database in 2019 which states that the area of Kui Buri NP is 621,991.99 rai (99,518.74 ha) with the same data as provided in the shapefile used for the project document. The original decree for Kui Buri NP in 1999 stated 96,900 ha, which is presumably the source used by WDPA.
- C) Regarding the process of correcting the corresponding WDPA entries, the PMU will coordinate with the related government department to correct the data in WDPA during project implementation. BEDO have been informed about this issue.
- 3. The requested change has been made in Annex F of the CER (p90). Table E does not include the relevant column.
- 4. The proposed area of 17,208 ha for improved management of biodiversity is based on ecological considerations that would support biodiversity-based tourism, including Pranburi estuary and Sam Roi Yot coast and wetland (outside the NP area) that include mangroves and other wetland habitats that support key species such as Fishing Cat (VU) and migratory waterbirds including threatened species such as Malaysian Plover, etc. Specific activities in these areas will focus on capacity building of community-based enterprises to showcase how local communities can demonstrate biodiversity-based tourism (eg mangrove tours, birdwatching, cat-watching, kayaking, etc) and biodiversity conservation in practice. In UNDP and BEDO?s opinion, this target area is both feasible with the budget available and reasonable, as interest in tourism development has expanded from Hua Hin to Pran Buri and Sam Roi Yot recently. While there are residential, tourism and agriculture areas within this landscape, parts are still of significance for biodiversity conservation. The expansion of this demonstration area towards Kui Buri is not practical as almost all landuse is agricultural, with little biodiversity or tourism interest.
- 5. GEF Core Indicator 6 has now been added to the documents, supported by the EX-ACT workbook (Annex 19b) and a summary of the methods and assumptions used (Annex 19a). See CER: p5-6, p32, Annex A p60, Annex F p91; Prodoc Results Framework p70, Annex 4 Monitoring Plan p127.

#### Part II? Project Justification

1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

#### JS 9/28/2021- Cleared, thank you.

#### JS 6/15/2021

- 1 The CER portal entry states that output 1.5 is a new output when "1.5 Capacity development program for mainstreaming biodiversity conservation within tourism planning, development and operations institutionalized within key national and provincial government agencies." was already in the approved PIF. Please correct.
- 2- Please clarify why the barrier identified by STAP related to "entrenched economic self-interest of those who benefit from unsustainable tourism developments, and likely push-back against limitations on this" has not been explicitly added and how it will be addressed by the project.

## **Agency Response**

## UNDP 2021/08/14

- 1. The text has been revised on p15 of the CER.
- 2. We fully acknowledge that during a development or an expansion of any economic sector, special interests that are motivated only by profit may try to undermine the social and the environmental values and their importance. Therefore, the proposed national strategy for mainstreaming biodiversity into tourism sector, and subsequent jurisdictional policies and plans, will ensure that the ?Triple Bottom Line? approach -an accounting framework with three parts: social, environmental [with special focus on biodiversity conservation for this project] and financial- will be taken during the development planning and operations of tourism in Thailand. This approach is embodied in the project strategy as explained in the response to the STAP Comment (CER Annex B p75). However, the consultations and assessments carried out at national and provincial level during PPG did not provide enough ground for regarding economic self-interests as a major barrier *per se* for this project in particular.
- 2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?

#### **Secretariat Comment at CEO Endorsement Request**

JS 9/29/2021- Cleared, thank you.

JS 6/22/2021 -

1) The baseline analysis shows that the many overlapping tourism strategies/plans that exist in Thailand will all expire in either 2021 or 2022 (annex 11.c / section 5). However, the baseline analysis is silent on the likely policy baseline during project implementation. What is foreseen for the next phase: revisions/updates of all these plans, development of a single overarching plan?

2) We note Annex 11j provides some lessons learnt from from international experience and annex 11.c some additional information on anticipated increments of a subset of the international projects listed in the baseline. However, the work of BIOFIN in Thailand is no longer mentioned, when the PIF stated it "provides an excellent opportunity for replication between the respective projects and this potential will be explored further during the PPG phase", and the CER mentions collaboration with BIOFIN. Please include BIOFIN in the baseline and its corresponding lessons learnt.

## Agency Response UNDP 2021/08/14

- 1. Component 1 of the project will engage closely with the revision process for the upcoming versions of the tourism strategies/plans (which in some cases are underway). It should be noted that COVID has had a massive impact on tourism in Thailand, and the development of new strategies and plans will respond to the new post pandemic reality (see ProDoc Annex 14 ? COVID Analysis and Action Framework). Secondly, Thailand is emphasizing a green recovery, as reflected in the Bio-Circular-Green Economy which the Prime Minister has stated will be included in the national agenda alongside Thailand 4.0 an economic model that aims to unlock the country from several economic challenges resulting from past economic development models. The BCG Strategic Plan 2021-2026 was approved in January 2021, hence the project advocates aligning the development of policies and strategies with BCG, which will facilitate biodiversity mainstreaming into the tourism sector. The project will work closely with the National Tourism Promotion Committee and its Working Groups that are revising the relevant policies, plans and strategies with BEDO providing inputs on behalf of the project, which aims to empower BEDO as an effective voice for MONRE that advocates for development of a sustainable, biodiversity-based economy, in this case the tourism sector (See Output 1.1 [CER p20, ProDoc p38]).
- 2. While BIOFIN is referred to in a number of places in the ProDoc text (eg: Output 2.2, Partnerships, Table 11, Table 12 and Scaling Up), we acknowledge that it should be described as part of the baseline analysis in Annex 11c. UNDP has liaised with the Thailand BIOFIN Phase II management team to obtain up to date information which has now been included in this Annex. Lessons learnt from the first phase of the BIOFIN Process in Thailand have also been added to Annex 11j ? although these have not included any specific analysis of the tourism sector to date.
- 3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?

Secretariat Comment at PIF/Work Program Inclusion

JS- 10/25/2020 - Cleared, thank you.

JS 9/29/2022

4.b. - Thank you for the clarification. Please include this additional information in the CEO endorsement document.

All the rest is cleared thank you.

- 1) The ToC outlined in the PIF relied on two main complementary strategies: (i) developing "niche" BD-based tourism to demonstrate a new model in secondary destination that could help disburse overcrowding at other high-biodiversity tourism sites in a sustainable way, and (ii) "greening" tourism in general, including addressing unsustainable tourism. The CER, however, does not adequately present the project contribution to the second strategy. While we note the responses STAP and Council on related questions, the project's contribution to "greening" tourism in general, in particular to tackling unsustainable tourism, is not clearly articulated, especially as some related elements (e.g. former 2.3) seem to have been scaled back. Please clarify the description of the alternative scenario, and in particular the ToC and conceptual model, to make explicit the project's strategy, ambition and underlying interventions specifically dedicated to "greening" tourism in general, including tackling unsustainable tourism.
- 2) The ProDoc states, in the summary of the ToC, "In turn, the benefits will offset impacts of HWC and lead to reduced poaching." However, HWC and poaching are not explicitly mentioned in any outputs / outcomes or anywhere in the ToC diagram. Please clarify the project contribution to HWC and poaching management or consider removing that sentence.

#### 3) Component 1:

- 3.1: In relation to comment 1 of the previous comment box on expiring tourism plans / strategies, please further clarify in the CEO endorsement request how (i) the project will contribute to the mainstreaming of biodiversity in the successors of these expiring national tourism strategy(ies) / plan(s), and (ii) the additional strategy dedicated to biodiversity-based tourism the project will develop will articulate with these?
- 3.2: Please clarify to what extent 1.2.1 (feasibility study for fee on PA entrance) and 1.2.2 (feasibility assessment on the potential to leverage conservation finance from the tourism sector) are not already/to be carried out by BIOFIN Thailand?
- 4) Component 2, output 2.3: We note the project will finance equipment and/or information technology for tourism enterprises (2.3.5) and "support them" to apply some standards (2.3.8).
- 4a- Please clarify if the latter also includes financial support and, more generally, if the project plans to support financially tourism enterprises, beyond equipment. If no financial support is to be directly provided by the project beyond the \$120,000 planned for equipment, please clarify why the provision of training, equipment and technical assistance, including assistance to access other funds (2.2.3), is considered sufficient.
- 4b- For equipment and any other direct financial support, please clarify what mechanism and criteria will be used to ensure fairness and transparency (e.g. competitive process?), which organization will be responsible for it (who will decide on grant/equipment

attribution and manage funds?), and how fiduciary standards will be duly enforced. Please also confirm that only community-based MSMEs will be directly supported.

5) Component 3: output 3.3 Please confirm that the collaboration with GWP on knowledge sharing, including the participation to GWP events, has been discussed and agreed with the GWP coordination teams.

## **Agency Response**

#### UNDP 2021/12/28

4b. The response has been incorporated into the CEO Endorsement Request document as requested (see the description of output 2.3 under the alternative scenario section of the CER? page numbers 26 and 27 and ProDoc page number 46).

#### UNDP 2021/10/20

4b. The response has been incorporated into the CEO Endorsement Request document as requested (see the description of output 2.3 under the alternative scenario section of the CER? page numbers 26 and 27 and ProDoc page number 46).

#### UNDP 2021/08/14

- The alternative strategy expressed in the PIF specifically refers to reducing the negative impacts of unsustainable tourism practices on biodiversity, although it does not refer to ?greening? tourism ? this is a much broader concept that goes beyond the Biodiversity focal area. As such, this approach aiming to reduce the negative impacts of unsustainable tourism practices on biodiversity is already an integral part of the project theory of change and alternative strategy. For example, Prodoc #49 states: The TOC can be summarised as follows: in order to address the serious threats to biodiversity in Thailand arising from unsustainable tourism practices, the project will mainstream biodiversity and environmental protection into the tourism sector, and enable local communities to benefit from biodiversity-based tourism products and services so that they benefit from biodiversity-based livelihoods, value biodiversity, and contribute to its conservation and monitoring. The project embeds activities to address challenges of pollution, climate change, and overtourism which will collectively help to prevent and mitigate threats to biodiversity from tourism development. We would like to note that Outputs 1.1, 1.2 and 1.4 in particular will contribute towards the mainstreaming of biodiversity conservation reduction of negative impacts on biodiversity in national tourism planning and standards, which will align strongly with the new BCG Strategy 2021-2026 that was launched in January 2021 by the Prime Minister. In addition, Thailand?s Green Tourism Promotion Strategies (2017-2021) aimed to coordinate and mobilise green tourism development in the country (see Annex 11c: Policy baseline analysis), and TAT and MoT have shifted towards more environmentally sustainable modes of tourism in their post-COVID ?new normal? tourism planning. The demonstration activities in the project landscape in Component 2 will reflect these shifts in national tourism planning towards more sustainable and biodiversity-friendly standards, for instance through the proposed Tourism Master Plan for the project landscape. However, in order to increase the emphasis on reducing the impacts on biodiversity of unsustainable tourism practices, the relevant sections have been revisited and edited. See: CER p17-18 (TOC diagram and summary text), p20, 24 p33 (conceptual diagram added); p33-37 (incremental reasoning table added); Prodoc Fig 2 (conceptual diagram), Fig 4 (TOC), Table 8, pp14,23,24-6, 28,29,38, 43.
- 2. The sentence on HWC has been removed from ProDoc para 49 on p27, CER p74 and p81 (STAP comment responses)

- 3.1 Please see the response to the earlier comment referred to, which describes how the project will engage with the revision of these national strategies and plans and contribute to the mainstreaming of biodiversity in this process and ensure the biodiversity-based tourism strategy articulates with these other relevant plans as indicated in Output 1.1 (CER p20, prodoc p38).
- 3.2 With reference to 1.2.1 and 1.2.2, BIOFIN Thailand has not conducted any specific analysis of the tourism sector, and the national level study completed in 2019 provided quite a high-level analysis and strategic guidance, without the level of detail that the current project would need to go into in order to provide operational solutions. BIOFIN Thailand has responded that it has not specifically addressed the issue of a biodiversity levy on PA entrance fees and the current pilot activity on Koh Tao that aims to unlock and establish tourism-based revenues by imposing new and adjusting existing user charges for biodiversity resources and business planning concerns a non-Protected Area for an isolated island municipality? quite a different context to mainland PAs. Therefore, these activities will not be carried out by BIOFIN Thailand in the immediate future. Output 1.2 (CER p18-19, ProDoc p39) has been edited to indicate close collaboration with BIOFIN on these activities.
- 4a) The project does not plan to provide financial support beyond the budgeted amount because the project?s approach of improving the standard, operating efficiency and capacity of those enterprises will empower them to be much more capable of accessing other sources of financial support that are available in Thailand (as mentioned in 2.2.3, these include: grants under the Thailand Tourism Promotion Fund under the Tourism Policy Act (2019), GEF Small Grants Programme, and Provincial Government Fund - an annual budget from the national government provided to district level such as funds for developing Community Enterprises who have registered with Department of Agriculture Extension. Another funding source is from the Department of Tourism, Community Development Department, and TAO). This would be facilitated by the training provided in writing grant proposals, information sharing and support through BEDO and the provincial tourism committee. BEDO does not favour the allocation of grants to enterprises but is willing to provide training and support to access available funding locally and nationally. So, the project will help enterprises to understand the requirements and to develop proposals to access such resources. This is considered to be in keeping with GEF?s aims for cost-effective and financially sustainable project delivery. Output 2.3 has been elaborated in the CER (p24-25) and Prodoc (p47) to clarify this.
- 4b) For equipment and any other direct financial support, please clarify what mechanism and criteria will be used to ensure fairness and transparency (e.g. competitive process?), which organization will be responsible for it (who will decide on grant/equipment attribution and manage funds?), and how fiduciary standards will be duly enforced. Please also confirm that only community-based MSMEs will be directly supported.
- The mechanism and criteria for the identification of recipient MSMEs will consist of a competitive process through which eligible community-based MSME's within the project target area will submit applications for project support that consist of a business concept and budget request that follow guidelines provided by the Provincial Project Working Group and that have been endorsed by the PMU. Project guidance, criteria and protocols for the establishment and operation of sustainable biodiversity-based tourism initiatives

and standards will be developed under Component 1, and communities will be trained in their application under 2.3.6.

The details of the competitive process and criteria for selection will be finalized during the first year of project implementation by the Provincial Project Working Group and PMU.

Criteria for selection of MSME proposals for project support will include:

- •Eligibility in terms of the registered MSME location and ownership (should be local), size of the MSME (maximum annual turnover), and absence of criminal record among the applicants
- •Any private enterprises from the formal tourism sector will be screened by UNDP?s private sector due diligence policy.
- •Consistency of proposals with UNDP and GEF safeguards standards (all proposals will be screened for potential safeguards risks)
- •Gender mainstreaming and women and youth empowerment benefits content in proposals
- •Alignment of biodiversity-based tourism proposals with the GEF project objectives Training will be provided to MSMEs in the project target area in relation to the applicable tourism standards, business planning and preparing biodiversity-based tourism proposals for both government and project support.
- 5. UNDP has followed up with the GWP Secretariat and made minor revisions to Output 3.3 and the text on stakeholder engagement and south-south cooperation (prodoc paras 142-143, p63-64; CER p33, p54). The collaboration with GWP proposed through this project has been discussed and agreed. Key project contacts at BEDO have also been shared with the GWP to facilitate their engagement.
- 4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?

#### Secretariat Comment at CEO Endorsement Request

JS 6/22/2021 - Cleared.

#### **Agency Response**

5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?

#### Secretariat Comment at CEO Endorsement Request

JS 9/29/2021- Cleared, thank you.

JS 6/22/2021 -

1- Please see comment on the baseline and alternative scenario related to BIOFIN and clarify the increment of output 1.2 compared to work undertaken by BIOFIN.

## **Agency Response**

#### **UNDP** Response

1. The substantial baseline provided by BIOFIN Thailand supports the application of the BIOFIN approach through pilot work in Prachuap Kiri Khan province under Output 2.2 (see CER p23, ProDoc p44), where the GEF project will collaborate with the BIOFIN Working Group to identify pathways for the implementation and establishment of local authority budgeting systems that increase efficiency in biodiversity management in the project landscape. These will aim to support sustainable tourism planning and controls at key sites for tourism within the project landscape, and to demonstrate financial tools and solutions developed under the project (Output 1.2) in the province. The activities in Output 1.2 (CER p18-19, ProDoc p39) have been edited to emphasise that they will also be conducted in collaboration with BIOFIN in order to draw on their experiences and methodology for analysing economic opportunities to leverage funding for biodiversity conservation through the tourism sector.

6. Is there further and better elaboration on the project?s expected contribution to global environmental benefits or adaptation benefits?

## **Secretariat Comment at CEO Endorsement Request**

JS 1/13/2022 - Cleared.

JS 9/29/2021- Please see remaining comment on core indicator targets.

JS 6/22/2021 - Cleared but see comment on core indicator targets.

## **Agency Response**

UNDP 2021/12/28

Please see the response above on core indicator targets, particularly core indicator 6.

#### UNDP 2021 10/20

Please see the response above on core indicator targets, particularly core indicator 6.

7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?

#### **Secretariat Comment at CEO Endorsement Request**

JS 9/29/2021- Cleared, thank you.

JS 6/24/2021

1) Sustainability: Please clarify how the training and capacity building provided will be institutionalized and last beyond the project timeframe. While it is clear and well-thought for output 1.5, it is less clear for the other training / capacity building activities undertaken in the project (training on standards in output 1.4, support to PA staff and committees in output 2.1, "comprehensive knowledge, skills and training package on biodiversity-based tourism" of output 2.3, ICT/social media marketing training of 3.2).

## **Agency Response**

UNDP 2021/08/14

1.In general, the project?s engagement and contribution towards the next national tourism development plan that is aligned with international tourism standards, and the tourism component in the BCG economic model and strategy will ensure the sustainability of the project outcomes. More specifically, the project?s support for the development of the national biodiversity-based tourism strategy in Component 1 and the tourism master plan for Prachuap Kiri Khan province in Component 2 will provide the vehicles for institutionalizing capacity building for biodiversity-based tourism, as government budgets for tourism and rural development can be channeled through such plans to support the specified actions during and after the project. In the case of Output 1.4, the integration of biodiversity considerations into national standards will provide the basis for institutionalized training going forward, with outreach to the PA system managers under DNP and RFD supported by BEDO programmes.

The project support for the existing learning centers at Kui Buri, Khao Sam Roi Yot and Pran Buri Estuary and Pran Buri Forest Park, and the new Fishing Cat Learning Centre in Ban Ho Mon-Koh Phai community neighbouring Khao Sam Roi Yot NP will provide local bases for institutionalized learning in the project landscape for Outputs in Components 2 and 3.

In Output 2.1, DNP, DMCR, and DASTA trainers will train the Provincial Project Working Group (PPWG), PA staff, PAC, and target local government authorities for use of the VUMF and Visitors Count!. While TAT Academy, ONEP, DMCR, DASTA, DoT, BEDO will provide guidance of related sustainable tourism standards (e.g. Green National Park and Green Hotel Standards, biodiversity-based tourism standard, Business and Biodiversity Check) to the PPWG. Targeted Partners (e.g. the Thai Responsible Tourism Association [TRTA], the Ecotourism and Adventure Tourism Association [TEATA]) will support the PPWG, sub-committee and target community enterprise groups as coachers to implement the biodiversity-based tourism, knowledge exchange with other groups, and improve related tourism standards that apply in the project sites. This will enhance the capacity of PPWG, PA staff, PAC, and targeted local community enterprises to implement those standards and tools. Key Performance Indicators (KPIs) will also be established for biodiversity-based tourism activities. PA staff and PAC committees will review the METT for each PA annually to monitor their performance and review the management plans. Therefore, these training inputs have institutional bases that have the capacity to continue to support training inputs under the provincial tourism master plan post-project.

In Output 2.3, the PPWG and tourism enterprises will work closely with the technical support partners (e.g. local NGOs, Civil Society) to validate proposed biodiversity-based activities and products, capacity building needs, and develop workplans through participatory and objective processes in line with UNDP social and environmental standards. Qualified local trainers will design training packages on biodiversity-based tourism curriculum and create self-learning documents and associated materials that tourism enterprise members will be able to repeat and access to self-learning after the training. Trained enterprise members will be empowered to provide practical guidance to other members. This will help knowledge transfer in the project sites and at provincial level. The learning centers in the project sites will provide a place for knowledge sharing

on biodiversity-based tourism, operated by CBTs. This will increase ownership and sustain the centers after the project end. The technical support partners will work with the PPWG at the site level and with tourism enterprises to apply the training package in the project sites, apply sustainable tourism standards that include biodiversity criteria, and facilitate the development of biodiversity conservation and threat reduction plans, assist CBTs to write small grants proposals.

The main training under Output 3.2 is in support of the creation and use of social media communication channels e.g. Facebook fan page to provide biodiversity-based tourism knowledge for local communities and key stakeholders, where ICT online training will be provided for local communities and guidance materials developed that will support post-project efforts that can be incorporated in the tourism master plan for Prachuap Kiri Khan (See CER Sustainability section, p33).

**Project Map and Coordinates** 

Is there an accurate and confirmed geo-referenced information where the project intervention will take place?

## **Secretariat Comment at CEO Endorsement Request**

JS 6/15/2021 - Yes, cleared.

## **Agency Response**

**Child Project** 

If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?

#### Secretariat Comment at CEO Endorsement Request

NA

#### **Agency Response**

Stakeholders

Does the project include detailed report on stakeholders engaged during the design phase? Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?

Secretariat Comment at CEO Endorsement Request

JS 9/29/2021 - Cleared.

1- Please tick the boxes in the portal entry:

#### 2. Stakeholders 6

Select the stakeholders that have participated in consultations during the project identification phase:

Civil Society Organizations 13

Indigenous Peoples and Local Communities 1

Private Sector Entitles

If none of the above, please explain why:

## Agency Response

UNDP 2021/08/14

The required adjustments have been made in the portal.

Gender Equality and Women?s Empowerment

Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities? If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?

#### **Secretariat Comment at CEO Endorsement Request**

JS 9/29/2021 - Cleared, thank you.

JS 6/24/2021

1- We note the annexed Gender analysis and Gender Mainstreaming and Action Plan. The latter, however, contains many activities (25), with none explicitly linked to specific project outputs and some not reflected in the description of the alternative scenario (e.g. Activity 2.1 Organize a consultation/informative meeting on biodiversity- based tourism [...] does not seem to appear in component 2, or Activity 2.14 Develop education campaign targeting Gen Z and female tourists in both domestic and international tourists, when there does not seem to be campaign targeting tourists planned under component 2)

Please confirm that all these "gender-related" activities are to be carried out, link each of them to specific project outputs and ensure that all the corresponding project outputs and activities upon which these "gender-related activities" depend are duly integrated in the description of the alternative scenario.

#### **Agency Response**

UNDP 2021/08/14

The Gender Action Plan (Prodoc Annex 9b) has been revised and now includes an additional column that states the corresponding Output number against each activity. The GAP activities have been cross-checked against these Outputs and revisions made to Outputs 1.1, 1.2, 1.3, 2.1, 2.3, 3.2, 3.3 & 3.4 to ensure conformity.

**Private Sector Engagement** 

If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?

## **Secretariat Comment at CEO Endorsement Request**

JS 6/24/2021 - Cleared.

#### **Agency Response**

**Risks to Achieving Project Objectives** 

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

#### **Secretariat Comment at CEO Endorsement Request**

JS 9/29/2021 - All cleared, thank you.

The private sector due diligence information has been provided as documents "Others\_01" to "Other 04", including a dedicated risk mitigation plan.

JS 6/24/2021

- 1- Risk 22 states "Private sector partnership risks, mitigation measures, and fuller detail of PTT are included in the UNDP?s private sector due diligence package for PTT" but we failed to locate the private sector due diligence package. Please clarify where it is included in the CER package or upload it if it was not the case.
- 2- The Annex 14. COVID-19 analysis and action framework uploaded with this submission contains tracked changes. Please upload a final version of this annex with the resubmission.

## Agency Response

UNDP 2021/08/14

- 1. The PDD package is uploaded to GEF Portal.
- 2. The tracked changes have been accepted? Annex 14 is now clean.

Coordination

Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?

## **Secretariat Comment at CEO Endorsement Request**

JS 10/25/2021 - All cleared, thank you.

#### JS 9/29/2021

- 1- Thank you for the clarification. While we regret that functional co-execution arrangements could not be found between the Ministries in charge of Tourism and of Environment for a project related to biodiversity mainstreaming in the tourism sector, we note the project's strategy to ensure proper coordination. Cleared.
- 2- The portal entry still uses UNDP's terminology, please replace it by or at least add GEF's terminology whereby BEDO is the Executing agency and UNDP the Implementing Agency:

The <u>Implementing Partner</u> for this project is BEDO. The Implementing Partner is the entity to which the UNDP Administrator has entrusted the implementation of UNDP assistance specified in this signed project document along with the assumption of full responsibility and accountability for the effective use of UNDP resources and the delivery of outputs, as set forth in this document.

The Implementing Partner is responsible for executing this project. Specific tasks include:

#### JS 6/24/2021

- 1- Please explain why this project entirely dedicated to the tourism sector is not at least coexecuted by the MOTS or one of its agencies.
- 2- Please use GEF terminology in the portal entry (implementing agency for UNDP / executing agency for BEDO).

#### **Agency Response**

## UNDP 2021/12/28

2- The terminology in the CER has been revised as requested, and this is now reflected in the portal entry.

## UNDP 2021/10/20

2- The terminology in the CER has been revised as requested, and this is now reflected in the portal entry.

## UNDP 2021/08/14

1. The PIF provides some context to the institutional arrangements for project execution:

In 2018, the Reform Committee of Thailand proposed the ?bio-economy? development concept as a new driver for Thailand?s development towards the national 20-year national

development strategy. This effort is steered by the High-Level commission on Thailand Reform for Economic Development where BEDO sits as Assistant Secretary of the Commission. The bio-economy roadmap recognizes the contribution that sustainable use of natural resources can provide to Thailand?s economy, through various industries. This development philosophy provides an excellent foundation to pursue biodiversity-based development, including through better recognition and integration of biodiversity into tourism development.

Overall, the project has been designed to dovetail with government policy directions for tourism development and bring together the mandates of different Ministries in an integrated fashion. This alignment will support the sustainability of the project as its mainstreaming focus will help embed the project approaches and biodiversity-based tourism within future tourism policy and strategy of the Royal Thai Government.

Consequently, it is appropriate that the Biodiversity-Based Economy Development Office (BEDO) is the Executing Agency for the project. While the Ministry of Tourism and Sports (MOTS) has been strongly supportive of the project from the beginning, it is a major co-financier (\$2.8 million), and plays a key role on the Project Steering Committee, together with the Department of Tourism (DoT) and the Tourism Authority of Thailand (TAT), amongst others.

Reasons for not pursuing the option of a co-execution modality include:

- A joint approach to project governance is not favoured by the Royal Thai Government, which strongly prefers a single responsible agency to avoid political and coordination complications:
- Co-execution would be much more complex in administrative terms, and seriously constrained by GEF?s 5% ceiling for Project Management Costs? the GEF project budget of \$2,639,726 is inadequate for an effective co-sharing arrangement, and co-financing resources are already committed and earmarked to technical aspects of the project;
- During the PPG phase, the executing agency BEDO confirmed that it would play central role in coordination within MONRE and serve as the key coordinating body with MOTS. BEDO will work closely with the MOTS at the highest level to champion the biodiversity-based tourism model (Annex 12c: Policy baseline analysis);
- Effective coordination for project execution and implementation will be achieved through the Project Steering Committee and established project management arrangements;
  - In Output 1.1, the project aims to improve coordination between the ministries of MONRE and MOTS by establishing a new sub-committee on biodiversity-based tourism under the existing joint agency technical working group of the two ministries. The National Tourism Policy Committee (NTPC) will be empowered with knowledge generated from the project through the ministers of MONRE and MOTS, which will enhance decision-maker?s awareness, and options for scaling up project results and best practices.

#### 2. The portal entry has been revised as requested.

**Consistency with National Priorities** 

Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?

**Secretariat Comment at CEO Endorsement Request** 

JS 6/24/2021 - Cleared.

## **Agency Response**

**Knowledge Management** 

Is the proposed ?Knowledge Management Approach? for the project adequately elaborated with a timeline and a set of deliverables?

#### **Secretariat Comment at CEO Endorsement Request**

JS 9/29/2021 - Cleared, thank you.

JS 6/24/2021 -

PLease correct the typo:

 Sharing knowledge generated by the project between project sites ar PTPC, the Provincial Project Working Group entrepreneurs and con The UNDP PRODOC Annex 2: Multi Year Work Plan provides

The work plan is annex 3.

The rest is cleared.

#### **Agency Response**

UNDP 2021/08/14

The Annex number has been corrected in CER p58 (two references). Environmental and Social Safeguard (ESS)

Are environmental and social risks, impacts and management measures adequately documented at this stage and consistent with requirements set out in SD/PL/03?

### Secretariat Comment at CEO Endorsement Request

JS 10/25/2021- Cleared, thank you.

JS 9/29/2021- Thank you for the clarifications.

We note the delays and limitations encountered during PPG as a consequence of the COVID pandemic. Please confirm that all safeguards assessments and plans that have been identified as necessary will be carried out in the very first phase of project implementation, before starting any of the on-the-ground work of component 2.

We note that project duration has been kept at 48 months despite these additional assessments and plans to be carried out and developed during implementation instead of

PPG. Please confirm that no delays are anticipated and that the project will nonetheless be able to be implemented within 48 months.

JS 6/24/2021 - We note the project is rated "moderate" overall and note the attached Social and Environmental Screening Procedure (SESP). We also note that two Strategic Environmental and Social Assessment (SESA), additional SESP screening at site-level, a Indigenous Peoples Plan (IPP), and FPIC processes are planned to mitigate potential impacts during implementation, and that the need for an Environmental and Social Management Framework will be decided depending on the SESA.

1- Please explain why, apart from the SESA that is planned under output 2.1 and is thus meant to be carried out during project implementation, these additional assessments and plans were not carried out during PPG.

## **Agency Response**

## UNDP 2021/12/28

We confirm that all safeguards assessments and plans that have been identified as necessary will be carried out in the very first phase of project implementation, before starting any of the on-the-ground work of component 2. At this point in time no delays are anticipated, and the project is expected to be implemented within 48 months.

#### UNDP 2021/10/20

We confirm that all safeguards assessments and plans that have been identified as necessary will be carried out in the very first phase of project implementation, before starting any of the on-the-ground work of component 2. At this point in time no delays are anticipated and the project is expected to be implemented within 48 months.

#### UNDP 2021/08/14

The project was initially rated ?moderate? based on pre-screening at PIF stage. During the course of the PPG, the COVID-19 Pandemic was prevalent in Thailand and several phases of movement restriction were imposed by the Royal Thai Government that seriously constrained opportunities for the conduct of social and environmental safeguard screening in the project landscape. Consequently, the potential impact of the project on indigenous communities in particular was identified only late in the PPG process, when the need for the SESAs, additional SESP screening at site-level, and Indigenous Peoples Plan (IPP) became clear. By this stage it was too late to conduct the necessary groundwork ? and also impossible due to the prevailing COVID movement restrictions. Consequently, the project plans include the necessary resources during year one to cover the necessary inputs. Monitoring and Evaluation

Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat Comment at CEO Endorsement Request JS 9/29/2021 - All cleared.

JS 6/24/2021

- 1- Current M&E budget represents 5.24% of the GEF-funded part of project financing, which is above the typical 5% observed in the GEF portfolio for project of this size. Please revise to 5% (\$125, 701) or under, or justify thoroughly why this project needs a bigger than typical M&E budget.
- 2- Please correct the typo in the portal entry. The monitoring plan is annex 4, not 3.

## Agency Response UNDP 2021/08/14

- 1. The previous total for the M&E budget was 5% of the total GEF grant, however it is noted from the comment that the requirement is in fact 5% of the technical components total. The M&E total has now been reduced to less than 5% of the technical components total, at \$125,600 (CER M&E Section p55-56; Prodoc Table 14, Prodoc Total Budget and Workplan, Prodoc Annex 1 GEF Budget worksheet.
  - 2. Annex number has been corrected in CER p58. Benefits

Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

JS 6/24/2021 - Cleared.

**Agency Response** 

Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request

JS 1/4/2022 - Cleared.

JS 10/25/2021 -

1b - Well noted. Please provide the co-financing letter from PTT with the next submission.

JS 9/29/2021

1a Cleared.

## 1b- Thank you for the clarification. Please provide the co-financing letter from PTT with the next submission.

JS 6/24/2021

The audit template submitted with this endorsement request has been reviewed and cleared from a technical and programmatic perspective. The financial, operational, and policy due diligence may reveal issues that may still need to be addressed by UNDP.

#### 1 Budget:

We note that project staff are also charged on components but that PMC is exhausted and adequate terms of reference are provided in annex 7 of the ProDoc.

1a: Please clarify more precisely what type of equipment and vehicles are to be purchased under the budget line "Finance equipment, vehicles and/or information technology required to improve the quality of the biodiversity-based tourism enterprises under Output 2.3 (3 years \* \$40,000 = \$120,000)". As the agency knows, the use of GEF funds to purchase vehicles is strongly discouraged. Please thus justify thoroughly why the purchase of vehicles is necessary and why, if the recipients are indeed tourism enterprises, vehicles are to be granted with GEF funding instead of using other financial tools or sources (e.g. commercial micro-loans).

1b: There are several budget lines that include support to PTT Plc?s Sirinart Rajini Ecosystem Learning Center, which, as we understand it, is led by the private sector. Please explain the status of this learning center and this planned support when there is no cofinancing from PTT reported.

## **Agency Response**

#### UNDP 2021/12/28

As mentioned above, PTT shared a letter of support to the project (see attached), they are requesting more time to follow internal procedures before they can issue a co-financing letter. It is expected that the co-financing letter will be shared during the first year of implementation the latest.

## UNDP 2021/10/20

UNDP and BEDO are meeting with PTT and expect to submit the cofinancing letter before the CEO Endorsement deadline.

#### UNDP 2021/08/14

1a. We wish to clarify that no motorized vehicles will be purchased under this budget line. The equipment to be provided has been deliberately left somewhat open because the needs of individual community-based enterprises will vary depending on the nature of the activities they are proposing for support under the project? some will be in forest locations, others riverside, others coastal or wetland-based. IT equipment support is considered important, such as to enable the provision of virtual tourism experience and online marketing, while items such as kayaks, life-jackets, rowing boats, binoculars, telescopes, camera traps, camping equipment are likely. CER? Output 2.3 p27; Prodoc: Output 2.3 p46, Budget Note 11, p93.

1b. UNDP and BEDO are working to secure a cofinancing letter from PTT before CEO Endorsement (noting that there was a change in management staff at PTT during the PPG). We wish to emphasize that this ELC provides huge baseline support for the project the facilities and staffing expertise it makes available to support implementation, beyond the cofinanced support that is anticipated.

**Project Results Framework** 

## Secretariat Comment at CEO Endorsement Request

JS 1/13/2022 - Cleared.

JS 9/29/2021 - Cleared but see comment on target for core indicator 6.

JS 6/24/2021 - Cleared but see comment on target for core indicator 4.1.

## **Agency Response**

UNDP 2021/12/28

Please see the response to the above-mentioned comment for core indicator 6. The Results Framework target has been modified accordingly.

UNDP 2021/10/20

Please see the response to the above-mentioned comment for core indicator 6. The Results Framework target has been modified accordingly.

UNDP 2021/08/14

No change required, with reference to the earlier comment on core indicator 4.1 GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request JS 6/24/2021 - Cleared.

## **Agency Response**

**Council comments** 

#### **Secretariat Comment at CEO Endorsement Request**

JS 9/29/2021 - Cleared.

JS 6/24/2021 - See comment 1 on alternative scenario and project contribution to "greening" tourism in general. Once addressed, please revise accordingly the response to Germany.

## **Agency Response**

UNDP 2021/08/14

The response to Germany has been elaborated in line with the comment referred to. STAP comments

## **Secretariat Comment at CEO Endorsement Request**

JS 10/25/2021 - Cleared.

JS 9/29/2021

1- Thank you, but the added elaboration does not address STAP's comment. Please clarify in the response table whether the project is to improve the status of biodiversity in target areas in absolute terms compared to present status, or "just" to alleviate the anticipated impacts of tourism that would occur without the project.

2 and 3- Cleared, thank you.

JS 6/15/2021 -

1- The following response is not clear, please clarify what the project will do beyond "improved management" if it is only "only one aspect of the complete solution".

<u>Outcomes</u>	As the expansion of tourism is foreseen, the improved management is only one as	CEO ER Annex A
"Note, however, that improved management doesn't equate t o improved biodiversity status - the proposal makes clear tha t expansion of tourism in this area is foreseen, and it is uncl ear whether the status of biodi versity is expected to improve, or just that the management o f the impacts of tourism will i mprove, making the habitat lo ss and other impacts of this to urist expansion less damaging than they otherwise would be."	pect of the complete solution to ensure that biodiversity conservation is an integra I part of the tourism development planning and operation. Improved management that partly entails capacity building and awareness raising will make sure that the responsible personnel are adept in biodiversity conservation. This includes – bein g able to assess changes in biodiversity indicators in the project landscape (e.g. p resence of fishing cat and waterbird species); developing mitigation measures during planning; and exploring and advancing opportunities to improve biodiversity st atus including biodiversity financing options.	UNDP PRODOC Section V Project ults Framework indicators for Outce 2, Indicator 3 on fishing cat and wat rd indicators, coupled with the UNI RODOC Annex 4 on monitoring che es.

2- In the response to STAP's comment on local communities participation in the tourism platform to be established, please clarify how the project will "enable local communities or their organizations to have direct representation in the platform":

"In component 2, part of the ai m seems to be to increase be nefits from tourism to local co mmunities, but they (or their re presentative orgs) don't seem to be included in the tourism p latform to be established". The rationale is that the community organizations and community-based tourism providers will be members of the Tourism Association (TA) and will be represente d in the platform through the TA. However, tourism related businesses organizations tend to have overrepresentation in TAs, thus, local communities' interests could be underrepresented in the TA agenda. Therefore, it is a better approach for the local communities or their organizations to have direct representation in the platform, which this project will enable.

Tourism associations participating in the project include the Thai Responsible Tourism Association (TRTA), Ecotourism and Adventure Tourism Association (TEATA), Thailand Community Based Tourism Institute Foundation (TCBTIF), Protected Area Committees (PAC) of Kui Buri National Park, Khao Sam Roi Yot National park, and Pran Buri, Tourism Association of Prachuap Khiri Khan (TAP), Prachuap Khiri Khan Community-Based Tourism Association (CBTA)

CEO ER Ouput 1.5, Table: Ro sponsibiltiies of key stakheolo plementation of the project

UNDP PRODOC <u>Section VII</u>
nce and management arranger
cribes the role of tourism asso
n the project (<u>Table 16</u>), and t
ipation in the existing Provinc
m Policy Committee, the proj
incial Project Working Group
inclusion as Beneficiary repre
(<u>Figure 5</u>).

Their role as stakeholders is f borated in UNDP PRODOC A akeholder engagement plan

3-PLease correct what appears to be an unintentional addition in the following response to STAP (see highlighted):

This is also reflected in the Theory of Change assumptions in the UNDP PROD OC Table 8: see A1: "There is political and institutional support for mainstream ing biodiversity conservation into tourism development, for improving coordin ation, and for reducing threats to biodiversity from the impacts of unsustainab le tourism. This could have a sentence added to the Notes and References column to say that this political and institutional support would carry through to implementing and enforcing new policies."

## **Agency Response**

#### UNDP 2021/12/28

1. The response to this STAP comment has been revised to reflect that it is anticipated that the project will contribute towards stabilized biodiversity status at the project demonstration sites, with the potential for slight improvements in condition (e.g. see Results Framework Outcome 2, indicator 3) and reduction of targeted HWC threats. At the wider national scale, the project will primarily reduce the negative impacts of tourism practices through biodiversity mainstreaming in the tourism sector, while leveraging additional support for conservation practices in protected areas that may result in improved biodiversity status in the medium to longer term.

#### UNDP 2021/10/20

1. The response to this STAP comment has been revised to reflect that it is anticipated that the project will contribute towards stabilized biodiversity status at the project demonstration sites, with the potential for slight improvements in condition (e.g. see Results Framework Outcome 2, indicator 3) and reduction of targeted HWC threats. At the wider national scale, the project will primarily reduce the negative impacts of tourism practices through biodiversity mainstreaming in the tourism sector, while leveraging additional support for conservation practices in protected areas that may result in improved biodiversity status in the medium to longer term.

### UNDP 2021/08/14

- 1. Improved management by reducing impact from tourism will also help address a number of outstanding issues e.g. community engagement and participation, more equal benefit sharing, reduced human-wildlife conflict, greater conservation investment from private sector, greater awareness among park visitors. Although improved management is only one aspect, in fact it addresses several root causes of biodiversity loss and degradation. Thus, the project will contribute far beyond just improved management of tourism impact. This clarification has been added to the response to the STAP comment in CER p.71.
- The project?s community engagement process will support local community organization representation on tourism platforms such as the provincial project working group and PTPC. This process will involve communicating with targeted communities to develop a workplan. According to this, the project will aim to establish a balanced number of stakeholders with identified roles and responsibilities in the platforms. It will develop a communication plan to communicate with the PTPC, PPWG, Project sites, and stakeholders. The project will build trust with the local communities at an early stage of project implementation and engage them in each step of work plan development and implementation. Local community enterprises may take the lead on a meeting to represent their activities at the project sites. There will be representation of women according to the project?s gender plan in working groups and activities such as capacity building and awareness programs. This process will increase the level of confidence of CBT enterprises on making presentations through knowledge sharing and site visits with the CBT network. Capacity building on communication, presentation and storytelling skills to local community enterprise will be provided. The project will facilitate their active participation when organizing workshops and meetings. An informal style of meetings will make local communities more relaxed and involved. The project will provide the opportunity for local communities to present their progress at meetings. Round table talks will provide an opportunity for local communities to present their opinions and will increase ownership for more natural representation in the tourism platforms. The response to STAP has been elaborated accordingly (CER p71-72).

3. The response to STAP has been corrected (CER p80) and Table 8 Assumption A1 edited to include the related comment (ProDoc p33).

**Convention Secretariat comments** 

**Secretariat Comment at CEO Endorsement Request NA** 

Agency Response
Other Agencies comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response CSOs comments

**Secretariat Comment at CEO Endorsement Request NA** 

## **Agency Response**

Status of PPG utilization

Secretariat Comment at CEO Endorsement Request Cleared.

## **Agency Response**

Project maps and coordinates

Secretariat Comment at CEO Endorsement Request JS 6/15/2021 - Yes, cleared.

## **Agency Response**

Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)

## **Secretariat Comment at CEO Endorsement Request**

NA

**Agency Response** 

Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)

Secretariat Comment at CEO Endorsement Request NA

## **Agency Response**

Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)

Secretariat Comment at CEO Endorsement Request NA

**Agency Response** 

GEFSEC DECISION

RECOMMENDATION

Is CEO endorsement recommended? (applies only to projects and child projects)

## **Secretariat Comment at CEO Endorsement Request**

JS 2/28/2022 - The project is recommend for CEO endorsement.

JS 2/10/2022- Two comments of the final set of comments were not addressed adequately (see first comment box). Please revise and resubmit.

JS 1/21/2022- Please address the final set of comments pasted in the first comment box and resubmit.

JS 1/4/2022 - Not at this stage. Please address the only remaining comment above (core indicator 6 target). Please resubmit removing all highlighting from the portal entry and the project document with a view to the circulation of clean documents to the GEF council.

JS 10/25/2021- Not at this stage. Please address the few remaining comments above and resubmit (co -financing letters, core indicator 6 target).

JS 9/29/2021- Not at this stage. Please address the few remaining comments above and resubmit.

JS 6/24/2021 - Not at this stage. Please address comments above and resubmit.

#### **Review Dates**

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
First Review	6/24/2021	
Additional Review (as necessary)	9/9/2021	
Additional Review (as necessary)	10/27/2021	
Additional Review (as necessary)	1/4/2022	
Additional Review (as necessary)	1/13/2022	

**CEO Recommendation** 

**Brief reasoning for CEO Recommendations**