



# Integrated management of the doumeraie of the Goulbi N?kaba watershed and adjacent ecosystems (Maradi Region)

Review PIF and Make a recommendation

## Basic project information

**GEF ID**

11409

**Countries**

Niger

**Project Name**

Integrated management of the doumeraie of the Goulbi N?kaba watershed and adjacent ecosystems (Maradi Region)

**Agencies**

FAO

**Date received by PM**

10/18/2023

**Review completed by PM**

10/23/2023

**Program Manager**

Jason Spensley

**Focal Area**

Climate Change

**Project Type**

FSP

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

### **1. General Project Information / Eligibility**

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

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

#### Secretariat's Comments

10Nov2023:

Cleared. Thank you. Indeed, this comment was a mistake on our part. We note the CER indicates the Executing Partner is the Ministry for the Environment and the Fight Against Desertification, and the LOE indicates this same Ministry.

22Oct2023:

Letter of Endorsement only includes the Ministry of Livestock and Animal Health as the Executing Partner. However, in Portal there is an additional executing partner (Ministry of Agriculture and Food Security) that is not included in the LoE. Please remove the Ministry of Agriculture and Food Security as it is not endorsed by the Government (it can be included later during the preparation phase as needed)

#### Agency's Comments

24 Nov 23

Please note that the name of the ministry has been updated, as per the revised Letter of Endorsement.

There seems to be a confusion with another project, as both the letter of endorsement and the Portal mention the Ministry of the Environment and the Fight against Desertification as the executing partner.

## 2. Project Summary

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

### 3 Indicative Project Overview

**3.1 a) Is the project objective presented as a concise statement and clear?**

**b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?**

Secretariat's Comments

10Nov2023:

Cleared

22Oct2023:

A) Yes

B1) Is there a challenge with the target population, and particularly agro-sylvo-pastoralists having access to credit at reasonable terms a barrier to their ability to make the investments they need to adapt and be more resilient to climate change impacts, which is a common challenge for small scale producers? If so, what is the strategy to address this? Further, what is the value in doing entrepreneurship training if nothing is done to address their (common) challenge of access to capital for their business or farm? We encourage consideration of a strategy with associate outcome to enable access to capital and accessible terms for agro-sylvo pastoralists and entrepreneurs to gain access to invest in their climate adaptation and resilience.

B) This is related in some ways to the financial sustainability of the project, after the project resources end. How will this project ensure financial sustainability of the activities by the target population.

## Agency's Comments

B1) Thank you for this suggestion. There is definitely a challenge in Niger, and in particular for agro-sylvo-pastoralists, to access credits and financial services. The performance of agro-sylvo-pastoral activities remains low in Niger, due in particular to an insufficient and inappropriate supply of financial services. Financial institutions, such as Bagri, other banks and Decentralized Financial Systems, find it difficult to engage in agricultural credit due to the high costs of services and the distance from service points, the absence of adapted banking methodologies, the insufficiency of guarantees offered by farmers (problem of land tenure), production and market risks (climatic hazards, price volatility, uncertain repayment capacity) and the lack of mechanisms to mitigate risks and reduce costs.

Accordingly, this barrier has been added paragraph 22, and additional baseline description elements and a new output (3.4) have been added in project description.

B2) The sustainability of the project outcomes will be achieved via:

- capacity building of a wide range of actors and institutions, including national, regional and local authorities, local institutions, youths (through the Farmer Business Schools modules of the APFS) and farmers (through APFS) (all outcomes);

- the participatory development and updating of Chartes foncières and sustainable landscape management plans that will provide for the long-term, sustainable management of ASP resources (Outcome 1); municipalities have a duty to pursue actions through their annual Investment Plans and the local structures set up (COGES) with their own funds or through the mobilization of other partners. We can also assume that actions such as Assisted Natural regeneration and localized restorations on family farms can continue given the visible benefits.

- the dissemination of climate-smart agricultural techniques, that will help farmers cope with the adverse impacts of climate change on agricultural productivity (Outcome 2);

And in particular the financial sustainability will be achieved through:

- the formalisation of community-level financial mechanisms (Outcome 3);

- the investment through IGAs and the establishment within groups of beneficiaries of resilience funds to perpetuate the financing of the actions (Outcome 3);

- the development and demonstration of the feasibility of profitable business plans for local agri-enterprises (Outcome 3).

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

## Secretariat's Comments

10Nov2023:

Cleared

22Oct2023:

No. Please expand on this. For example, please consider how best reflect gender dimensions in Outputs 1.1.3; 1.1.4; 2.2.1; 2.2.2.

### Agency's Comments

Gender equality is believed to be a condition for successful climate change adaptation actions in rural communities of Niger. Vulnerability to climate change affects women disproportionately. Economic migration from unproductive and degraded landscapes often leaves women with heavier economic burdens in rural areas. Climate-related risks, particularly in urban areas, such as extreme weather events, water shortages and heatwaves deepen inequalities and increase the risk of gender-based violence. Still, despite the fact that women make up more than half of the labour force in agriculture in the country, they have very limited access to resources and extension services such as micro-credits, land rights, access to technology and know-how. 95% of the women are engaged in subsistence agriculture or the informal sector, and play a fundamental role in the management and utilisation of the forest resources.

These insights, which are observed throughout the different regions of the country (and which will be further detailed during the PPG phase thanks to a specific gender assessment in the selected project sites), have informed the preliminary project design. Each project component adopts an active do-good gender approach, and indicators help monitor the gender mainstreaming results achieved throughout the project implementation. Additional information has been added to the PIF as suggested:

Land tenure securitisation, for women and men alike, is a fundamental indicator of success of outcome 1 and the project ensures that women's access is addressed throughout the different outputs to achieve this. For instance, capacity development carried out under Output 1.2 will address the existing inequalities, highlight the role and participation of women in natural resources use and management to raise awareness on the need for gender equality. Restoration strategies and solutions must reflect the differentiated roles and responsibilities of these groups, particularly recognition of land ownership.

Output 1.4 has been added to implement the Club Dimitra approach, an action recognized as good practice for the empowerment of women by the Ministry of Population, Promotion of Women and Protection of Children in Niger. The Dimitra Clubs approach has proven to be a driver of change at the community level. It is based on dialogue, reflection and inclusive development which involves the participation of women, men, and young people. Dimitra clubs provide a space for dialogue within the community. They help promote the position of women in their community and emphasize the importance of participation, partnership and networking. During this process, community or rural radio stations are called upon as relays to disseminate information more widely, offering access to knowledge and paying great attention to themes, themselves identified and requested by the clubs. Climate resilient approaches and practices adopted under Outcome 2 are selected in a participatory fashion, and the project will ensure that no practices or approaches are being selected that women are culturally, socially or other not likely to adopt. The

implementation of restoration activities itself can provide a crucial opportunity for the economic empowerment of women and youth, hence, resilience to climate shocks. Results to be achieved under Outcome 3 are rooted in a number of gender sensitive approaches, including agro-pastoral field schools, gender-sensitive value chain development, which will allow the project to achieve the targets. Women's participation in income-generating activities may be limited by a lack of resource mobilization as well as cultural and religious norms. The project will implement interventions primarily focused on income-generating agricultural activities and rural employment creation for women, youth and other vulnerable and marginalized groups, enabling them to increase their economic independence and strengthen their involvement in decision-making within their community.

These are but some examples. As mentioned above, **an exhaustive and comprehensive gender assessment will be carried out during the PPG phase and further inform the project design.** Provisions will be taken to fully embed gender equality in project decision-making, implementation and monitoring.

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

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

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

Secretariat's Comments

22Oct2023:

A) Yes

B) Yes

C) Yes

Agency's Comments

**4 Project Outline**

**A. Project Rationale**

**4.1 SITUATION ANALYSIS**

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

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

Secretariat's Comments

22Oct2023:

A) Yes

B) Yes

Agency's Comments

#### **4.2 JUSTIFICATION FOR PROJECT**

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

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

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

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

Secretariat's Comments

22Oct2023:

A) Yes

B) Yes

C) Yes

D) Yes

Agency's Comments

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

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

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

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

Secretariat's Comments

22Oct2023:

A) Yes

B) Yes

Agency's Comments

### **5.2 INCREMENTAL/ADDITIONAL COST REASONING**

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

### **5.3 IMPLEMENTATION FRAMEWORK**

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

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

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

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

Secretariat's Comments

10Nov2023:

Cleared

10Nov2023:

Cleared

22Oct2023:

A) No. Does the GEF Agency expect to play an execution role on this project?



B) Please describe the implementation and coordination arrangements. The "Coordination and Cooperation with Ongoing Initiatives and Project?" section has no information.

C) Yes

D) Yes

### Agency's Comments

A) FAO does not expect to play an execution role in this project. The Portal does not show a "No" box that can be ticked, but this has been made explicit in the text field.

B) The project is necessarily the subject of a broad spectrum of interventions in order to be able to contribute to the implementation of policies, strategies and programs in several sectors including the environment, agriculture, livestock and water resources.

At the operational level, **the ministry in charge of the environment will supervise the project** and will collaborate closely with other ministries operating in rural areas, notably the ministry of Agriculture, livestock and water resources.

The institutional set-up of the project can tentatively be organized into two levels of responsibility:

At national scale :

A level of strategic coordination will be ensured by a steering committee comprising ministries and specialized institutions and civil society;

A level of operational coordination responsible for planning interventions and managing the project will be created under the supervision of the anchor ministry (Project Management Unit). A project monitoring-evaluation system will be put in place and will be added to the existing system of the supervisory ministry.

2. At regional and local scales:

Actors at the regional and local levels constitute the level of implementation of actions and activities on the ground, based on partnerships between the project, technical operators, NGOs and the municipalities concerned. The execution of the project on the ground will be carried out under the supervision of the regional, departmental and municipal directorates of the different sectors.

**The key to this project is the communal approach to project implementation.** The land restoration actions proposed in the project components will be carried out in watersheds, agricultural areas and in forest and pastoral ecosystems belonging to municipalities and intercommunal areas. Therefore, a municipal and intercommunal approach is the best choice to carry out and succeed in these actions. Rural populations understand this approach having benefited from previous projects for which they were the implementing actors on this scale.

The implementation approach of this project will thus be based on the experience of recent (FFEM and IKI funded) and ongoing projects and will be an opportunity to scale up

the successful experiences of these projects. The municipalities will be both the project owners of the actions and investments planned by the project and responsible for the execution of the activities which will be carried out by their organized and supervised populations.

Actions relating to inter-municipal areas such as pasture areas, passage corridors and forest areas will be implemented on the basis of consultations between municipalities, definition of actions and common management rules.

It is the responsibility of municipal authorities and municipal councils to plan, develop and execute activity programs by articulating them with other interventions planned in the same area by other projects and programs.

The municipalities in the project intervention area will agree to plan the project's actions and investments in their respective Local Development Plan (LDP). Decentralized and municipal technical services, depending on their area of expertise (agriculture, livestock, environment, hydraulics, rural engineering, etc.) will participate in the execution of project activities, particularly in the areas of capacity building and supervision of field actors.

The CRA (Regional Chamber of Agriculture) and the technical services, through their experience, will work in synergy to animate and drive the implementation of the project. The CRA has experience in strengthening the capacities of field actors in land restoration, producing and providing relevant information and proposing innovative practices to field actors.

Professional organizations and umbrella organizations, through their experience, will also provide supervision to farming populations in their activities and help in the management of shared and intercommunal natural resources. They also have the experience that they will make available to the project in order to defend the interests of rural populations in regional bodies (Regional Council) and project governance bodies. All these actors involved in capacity building will do so in the field school spirit.

Please note that the exact implementation and execution arrangements with the different national and regional entities, will be determined further following discussions and consultations with all relevant stakeholders during the PPG phase.

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

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

Secretariat's Comments

10Nov2023:

Well noted.

22Oct2023:

A) Yes. But with regards to sectors, we are a little surprised that agriculture only received 30%. Please briefly explain.

B) Yes

Agency's Comments A) This has been revised to 50%. Please note however the strong focus on integrated landscape restoration.

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

Secretariat's Comments

22Oct2023:

N/A

Agency's Comments

**5.6 RISKS**

**a) Are climate risks and other main risks relevant to the project described and addressed within the project concept design?**

**b) Are the key risks that might affect the project preparation and implementation phases identified and adequately rated?**

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

Secretariat's Comments

10Nov2023:

Cleared. Apologies. This was indeed a confusion with another project.

22Oct2023:

A) Yes

B) Yes

C) The project overall ESS risk is classified as high/substantial in the Portal and said that additional assessment will be conducted to determine the development of an ESMF during project preparation or implementation at PPG. However, the attached Environmental and Social Screening and rating documents indicate that the project environmental and social

risks are Category B, moderate risk. Please make these risk rating consistent and provide consistent environmental and social risk assessment.

Agency's Comments C) There may be a confusion with another project, as both the ESS document and the Portal entry indicate the risks **from** the project to be medium/moderate. The overall level of risks **to** the project is also rated as moderate at this stage.

#### **5.7 Qualitative assessment**

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

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

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

#### Secretariat's Comments

10Nov2023:

Cleared

22Oct2023:

A) Please see comment above about financial sustainability.

B) Please explain further how this project is innovative, and consider the comment above about improving access to finance (which may require advancing financial literacy) to small holders, herder, and micro enterprises, be it through microloans, insurance, or otherwise. The MSP that FAO is doing with CIAT and other work of CIAT in this area may be of relevance, or example in partnership with local banks and microfinance institutions.

#### Agency's Comments

A) Please see reponses to comments above.

B) The main innovation of the project, compared to past projects, is to put rural communities back at the center of the action, in the logic of decentralization undertaken in Niger, and more generally in many sub-Saharan countries. By strengthening their project management and project management capacities, from planning to execution, monitoring and evaluation of actions, by entrusting them with fiduciary management, and by allowing them to recruit technicians, the project will make it possible to assess the relevance of this approach to the successful ?scaling? of FLR/SLM as a resilience strategy that everyone is

calling for (GGWISS, Bonn Challenge, AFR100 Initiative, land degradation neutrality, etc.).

The project will strengthen the ongoing decentralization process and support the development of integrated and participatory land use plans that will inform the integration of climate change adaptation and green activities into local development plans (LDP) and annual investment programs (AIP) at the municipal level. Based on the decentralization of institutions and the strengthening of local authorities at the municipal level, the project will support the development of green LDP resilient to climate change and will ensure the financing of green activities in the AIP. The project will use existing structures at the municipal level, strengthen them and give municipalities the financial means to achieve their resilience objectives.

The suggestion to make links with the FAO-CIAT MSP project is well noted. However, the existing baseline in Niger does not seem conducive to implement such advanced interventions as the ones planned under this project. Nevertheless, potential links will be further examined during PPG, as the MSP is implemented. Other types of mechanisms to support financial capacity building (Caisses de Résilience, AVECs), more suited to the Niger context, have been suggested (cf. responses to comments above).

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

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

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

Secretariat's Comments

10Nov2023:

Cleared

22Oct2023:

Given Biodiversity contribution of 1 has been specified, please 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)

Agency's Comments The proposed project will contribute to several targets of the Kunming-Montreal Global Biodiversity Framework, the key ones being targets 2, 3, 8, 10 and 11. Additional detail has been added in the PIF.

**7 D. Policy Requirements**

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

**8 Annexes**

**Annex A: Financing Tables**

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

**STAR allocation?**

## Secretariat's Comments

10Nov2023:

Cleared

22Oct2023:

There is not proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 5%, for a co-financing of \$29,232,000 the expected contribution to PMC must be around \$1,461,000 instead of \$1,218,000 (which is 4.1%). As the costs associated with the project management must be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution and the co-financing contribution must be proportional, which means that the GEF contribution to PMC might be decreased and the co-financing contribution to PMC might be increased to reach a similar level. Please amend either by increasing the co-financing portion and/or by reducing the GEF portion. A more definitive estimation of PMC will be presented and adjusted at CEO Endorsement stage.

**Agency's Comments** ?The cofinancing ratio for PMC has been adjusted for proportionality, and now stands at 5% of technical components and M&E (similar to GEF grant portion).

**Focal Area allocation?**

## Secretariat's Comments

22Oct2023:

N/A

## Agency's Comments

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

## Secretariat's Comments

22Oct2023:

Yes

Agency's Comments  
SCCF A (SIDS)?

Secretariat's Comments  
22Oct2023:

N/A

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

Secretariat's Comments  
22Oct2023:

N/A

Agency's Comments  
Focal Area Set Aside?

Secretariat's Comments  
22Oct2023:

N/A

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

Secretariat's Comments  
22Oct2023:

Yes



Agency's Comments

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

Secretariat's Comments

10Nov2023:

Cleared

22Oct2023:

Yes. PLEASE avoid the pattern of many FAO projects of significantly reducing expected co-finance at PIF to CER stage.

Agency's Comments Please note that total cofinancing has been revised for a more conservative estimate. During PPG, the opportunity to further confirm higher levels of cofinancing will be explored.

**Annex B: Endorsements**

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

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

Secretariat's Comments

27Nov2023L

Cleared

10Nov2023:

The template utilized for this project removed the footnote that conditions the selection of the executing partner to the following: *Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate?*. Also, the breakdown of the Agency fee does not differentiate among the fee for the GEF financing *vis-?-vis* the fee for PPG, so we cannot guess how much goes to each part. Per the attached email back in March when we were aiming to constitute June 2023 Work Program, Agencies were informed that LoEs *with modifications cannot be accepted and will be returned?*. While the removal of the footnote seems to be trivial, it is not: this footnote reduces the chances of having an executing partner that does not meet the fiduciary and procurement standards required to safely execute the project. Please request the Agency to get a new LoE using the LoE template accessible on the GEF website (we will review the financial information again when we get the updated LoE).

Agency's Comments **Please see the revised letter of endorsement uploaded on the Portal. Please note that the name of the ministry has been updated in the Portal and the uploaded PIF, as per the revised Letter of Endorsement.**

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

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

Secretariat's Comments

22Oct2023:

N/A

Agency's Comments

**Annex C: Project Location**

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

**Annex D: Safeguards Screen and Rating**

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

**Annex E: Rio Markers**

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

**Annex F: Taxonomy Worksheet**

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

Secretariat's Comments

22Oct2023:

Yes

Agency's Comments

**Annex G: NGI Relevant Annexes**

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

Secretariat's Comments N/A

Agency's Comments

**9 GEFSEC Decision**

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

Secretariat's Comments

27Nov2023:

Recommended for technical clearance

22Oct2023:

Not yet. Some comments need to be addressed.

Agency's Comments Please see responses to comments above.

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

Secretariat's Comments

Agency's Comments

**Review Dates**

	<b>PIF Review</b>	<b>Agency Response</b>
<b>First Review</b>	<b>10/24/2023</b>	
<b>Additional Review (as necessary)</b>	<b>11/10/2023</b>	
<b>Additional Review (as necessary)</b>	<b>11/27/2023</b>	
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		