



Community-based conservation for biodiversity and livelihoods in the context of climate change in DRC

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

11590

Countries

Congo DR

Project Name

Community-based conservation for biodiversity and livelihoods in the context of climate change in DRC

Agencies

FAO

Date received by PM

2/10/2025

Review completed by PM

4/4/2025

Program Manager

Benjamin Singer

Focal Area

Biodiversity

Project Type

GBFF

**PIF
CEO**

1. General Project Information

a) Is the Project Information table correctly filled, including specifying adequate executing partners?b) Are the project tags properly selected, i.e. any tag on 'support to IPLCs' or KMGBF target is justified given the project description.

Secretariat comment at CEO Endorsement Request

2025/02/25 cleared

Agency Response

c) Are the Rio Markers for CCM, CCA, BD and LD correctly selected with corresponding CCM, CCA, BD and LD benefits made explicit in the project objective, log-frame and/or theory of change?

Secretariat comment at CEO Endorsement Request

2025/02/25 The theory of change diagram in the CEO endorsement request is not readable because the resolution is too low. Please provide a higher resolution file.

2025/03/28 Received with many thanks and cleared

Agency ResponseA new picture of the theory of change with higher resolution has been included directly in the project document and Portal.

2. Project Summary

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

b) Does the summary capture the essence of the project?

Secretariat comment at CEO Endorsement Request

2025/02/25 While all the main elements are included in the summary, it is discombobulated and difficult to read. I would suggest teasing out all the elements one by one (problem, objective,

strategies, key expected outcomes) and weaving them again from scratch into a more coherent narrative.

2025/03/28 Summary is somewhat improved - hereby cleared.

Agency Response The project summary has been restructured as suggested and adjusted to reflect other comments.

3. Project Description Overview

- a) Is the project objective statement concise, clear and measurable?
- b) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?
- c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
- d) For multi-Trust Fund projects with GEFTF financing, are the GEFTFT Project Financing and Co-Financing contributions to PMC proportional?
- e) Is the PMC equal to or below 10% (for projects with GEF project financing less than or equal to \$2 million) or 5% (for projects above \$2 million)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

2025/02/25 Please include an identifier for each component as was done during the PPG phase.

While there remain diverse ways of presenting a ToC, key issues are to communicate clearly, through a diagram and a narrative, the causal pathways by which interventions are expected to have the desired effect and the justification that these causal pathways are necessary and sufficient. Please refer to STAP's guidance (<https://www.stapgef.org/resources/advisory-documents/theory-change-primer>) and provide a short narrative with the ToC diagram, and link assumptions to causal pathways.

2025/03/28

- ToC and narrative improved and more clearly laid out, with causal relationships spelled out - cleared

- The project components still have no identifier/numbering (i.e. Component 1 ? Component 2 ?). Please amend.

Project Description Overview

Project Objective

To conserve and sustainably use biodiversity in Community and Indigenous Land of the DRC, supporting the recovery of degraded ecosystems, carbon sequestration and storage, climate resilience, and people's livelihoods.

Project Components	Component Type	Project Outcomes	Project Outputs	Trust Fund	GEF Project Financing(\$)	Co-Financing(\$)
Enabling regulatory, policy and institutional environment for community-based biodiversity conservation and sustainable management	Investment	Outcome 1: The regulatory, policy and institutional frameworks are more supportive/favourable towards IPLCs stewardship and governance of community-based conservation and sustainable management of Community and Indigenous Lands	Output 1.1: Enhanced awareness and understanding of environmental legal (texts and policies) and customary laws and practices promoting IPLC stewardship, rights, gender equality, and HRBA for biodiversity conservation and sustainable management	GBFF	963,525.00	2,600,000.00
IPLC-driven biodiversity restoration, conservation and sustainable use in selected Community and Indigenous Lands	Investment	Outcome 2.1: Empowered IPLCs secure formal tenure rights over their lands, enhance biodiversity conservation and sustainable use Outcome 2.2: Improved IPLC livelihoods from biodiversity friendly profitable entrepreneurship initiatives	Output 2.1.1: 150,000 ha of Community and Indigenous Land demarcated and registered Output 2.1.2: 14,000 ha of Community and Indigenous land restored and managed sustainably for biodiversity conservation, and livelihood enhancement	GBFF	3,214,570.00	7,328,571.00

2025/04/04 Thank you. This is cleared.

Agency Response

4 April 2025

Component numbers have been added in the referenced table.

Earlier responses

Components have been numbered.

In line with the GEF STAP's guidelines on theory of change, the project theory of change has been reorganized to connect each causal pathway with relevant assumptions. It has also been adjusted to better reflect the conflict sensitive approach. Finally, a narrative of the logic of intervention has been added.

Project Outline

4. CHANGES COMPARED to PPG REQUEST

4.1 Are changes to the project design, including to elements put forward in the PPG request to meet GBFF selection criteria, been described and justified. And are they acceptable?

Secretariat comment at CEO Endorsement Request 2025/02/25 N/A

Agency Response

5 B. Project Rationale

- a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?**
- b) Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?**
- c) If this is a blended finance project under GBFF Action Area 4, is there a description of how the project and its financial structure are addressing financial barriers?**

Secretariat comment at CEO Endorsement Request

2025/02/25 It would be useful to include a brief section providing background on the targeted IPLCs, notably basic information on demography, livelihoods and challenges (level of education and health, current sources of income if any). Some of this is already included in the section on barriers, but it would be good to consolidate this.

Please also justify FAO's comparative advantage in community-based conservation and highlight how this translates into the project design.

2025/03/28 Both issues have been fully addressed. Thank you for this. Cleared.

Agency Response

A short paragraph has been added summarizing key baseline information on the targeted IPLC, with a particular emphasis on Pygmy Indigenous Peoples. More extensive information on IPs, including pictures, can be found in the Indigenous Peoples plan which is provided in Annex F-2.

A paragraph highlighting FAO's experience in community-based conservation in general and in DRC specifically has been added in the section Rationale ? Baseline, ongoing investments and lessons learned.

6 B. Project Description

- 6.1 a) Is there a concise theory of change (a narrative and a diagram) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?**
- b) Is there a description of how the GEF alternative will build on previous and ongoing investments**

(GEF and non-GEF), lessons and experiences in the country/region?

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

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

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

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

g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options)?

h) Are the relevant stakeholders (including women, IPLCs, private sector, CSOs) and their roles adequately described within the components?

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

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

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

l) Transformation and/or innovation: Is the project going to be transformative or innovative? Are the specific levers of transformation identified and described? Does it explain scaling up opportunities?

m) For blended finance project only, is the financial structure adequately explained?

Secretariat comment at CEO Endorsement Request

2025/02/25 1. Page 19: the theory of change illustration is unreadable. Please provide a version in higher resolution. Also, expressions such as "living in harmony with nature" are best avoided as they could be perceived as a naive understanding of the complex relationship between IPLCs and natural environments.

2. Output 2.2.1 provides an interesting dimension to the project.

- The narrative seems to imply that when businesses are biodiversity friendly, they are economically viable. This is not necessarily the case. A more cautious phrasing would be welcome, stressing that while it could be a useful condition it is by no means the only condition to achieve economic viability.

- There also seems to be an assumption that IPLCs already have business expertise or acuity, but given that they have economically been marginalized for generations and may at best have completed only primary education, this is very unlikely. There is recognition of the need to

strengthen entrepreneurship, but a more realistic assessment of the very limited baseline in terms of entrepreneurship among IPLCs in the region would be needed.

- The URL provided in this section (<https://www.fao.org/forestry/enterprises/25492/fr/>) does not work

- What are the targeted businesses? Are they individually or community-owned? Do they already exist or would they be set up?

- Has research been conducted that suggests that the value chains the project would focus on are viable and could provide a sustained source of income for IPLCs? Any market research?

- How will businesses be supported, in addition to capacity building on entrepreneurship? Will the project facilitate access to credit/micro-credit (does credit exist locally)? Will the project tap into existing resources to build capacity (business schools, courses) or create new courses from scratch?

3. One of the reasons for the questions on output 2.2.2 is that it will be crucial to the project's long-term strategy, particularly its financial exit strategy. Please detail, in addition to providing further information on output 2.2.2, what the project's exit strategy consists of.

4. The experience of FAO on conservation is limited in DRC, as well as its experience with GEF trust funds in DRC.

- What lessons and best practices you may transfer from the successful GEFID5545 in the Katanga (Community-Based Miombo Forest Management in South East Katanga)?

- We may think that FAO is building on the results of the GEFID 9515 (The Restoration Initiative, DRC child project: Improved Management and Restoration of Agro-sylvo-pastoral Resources in the Pilot Province of South-Kivu). This project faced difficulties at start, notably related to the partnerships on the ground, the operationalization of Clubs Dimitria, the difficulties to have results on the ground, and the weakness of the M&E. The MTE took place very late, too late to deeply adjust the project: what measures are proposed to avoid the same problems: how have you considered the partnerships on the ground? Are you confident on the M&E plan? Can you agree upfront about a Mid-Term Evaluation at least two years before closing?

- This previous comment to FAO is also applicable to other GEF agencies. We understand it is complicated to develop conservation projects in Eastern DRC. There is actually a diversified portfolio related to protected areas in Eastern DRC and near the Tanganyika lake. Practically all projects have faced initial difficulties of implementation in this remote region, notably in operationalizing partnerships with ICCN and local partners, often with limited capacities: What lessons can you take from these other projects on the Tumba-Lediima reserve with the WB (GEFID 9760, improved forested landscape management project), the Kabobo-Luama landscape with UNDP (GEFID 10242, Kabobo-Luama PA landscape management), several protected areas and corridors in the Kivu+ landscape with UNEP under the GEF7 Congo IP (GEFID 10314).

- Once it is operational, coordination with the GEFID10388 on the Lake Tanganyika may be considered.

- Thanks to the implications of ANAPAC, you should be able to draw lessons from concerned ICCAs and the GEF7 Inclusive Conservative Initiative (GEFID10404). Please confirm this is the case.
- We take note of the implication of ANAPAC and REPALF. We recommend keeping the regional network, REPALF, informed, as it will be important for you to make reference to the regional strategy for IPLC in the Congo Basin.
- The GEFID9760 project was successful in supporting decentralized authorities (capacities, procedures). We recommend sharing good practices with the WB and ERPA. (output 1.2).
- The capacities of national institutions, as the ICCN and the General Direction for the Environment may be bottlenecks in project implementation. Is there any particular plan to reinforce their capacities in their abilities to manage a procurement plan, supervise partnerships on the ground? (output 1.3)
- About the support to IPLC (output 1.4, outcome 2.1), we recommend checking the lessons acquired on ICCAs by ANAPAC.

5. Gender

- Implementing gender responsiveness and equality measures in a project are complex in Eastern DRC. Please, explain the specific measures you will implement to target 50% of women of beneficiaries (component 2 for instance), in a male dominated society, where inequalities are well documented.
- Please ensure that lessons learned and good practices on women's empowerment and gender equality are included in Output 3.1.1.
- Please ensure that the CoP mentioned in Output 3.1.2 include women and women's groups.
- Please ensure the reflection of gender perspectives and/or women's representation and leadership in outputs under Component 4.
- Under Monitoring and Evaluation, and in MTRs and TE, please ensure that gender-specific results, including those included in the Gender Action Plan are monitored and reported on in the course of the project's implementation.

2025/03/28 Points 1-5 cleared

Agency Response

A new picture of the theory of change with higher resolution has been included directly in the project document

Mentions "living in harmony with nature" have been removed both from the theory of change and the project document.

The narrative under Output 2.2.1 has been revised to adopt a more balanced formulation. It clarifies that while biodiversity-friendly practices can support long-term economic

potential?through added value and access to green markets?they are not sufficient on their own. Viability also depends on access to finance, markets, infrastructure, and enabling policies. The revised text also introduces the Green Corridor model, now included in the revised Law on Nature Conservation (December 2024). This framework offers a promising opportunity to promote community-led, biodiversity-positive enterprises in integrated land-use areas, positioning them to benefit from future investment and policy incentives.

-The narrative of Output 2.2.1 has been revised to reflect a more realistic view of the limited entrepreneurial experience among IPLCs, linked to marginalization, low education levels, and exclusion from market systems. It now clarifies that capacity-building will start with basic financial literacy, cooperative management, and early-stage business incubation adapted to local contexts.

-The broken link has been removed and replaced with an updated reference to FAO's ([FAO Knowledge Repository](#)).

The narrative now clarifies that targeted businesses will mainly be community-based or cooperative, building on existing informal activities and new group initiatives, most of which will require structured incubation and support.

The revised text references initial diagnostics and participatory value chain assessments (e.g. the June 2024 Indigenous Peoples Vulnerability Assessment in Nyunzu, PPG-led data collection with a value chain expert, and prior FAO programmes). These will be further refined during the inception period using FAO's Market Analysis and Development (ADM) approach to ensure value chains are viable and relevant to local realities.

A concise support package is outlined, including tailored technical assistance, business plan development, potential linkages to local microcredit institutions, and collaboration with existing training centers. Where needed, basic entrepreneurship training will be integrated using adapted materials.

The narrative for Output 2.2.2 has been expanded to clarify its role in sustaining IPLC-led value chains through market linkages, cooperative strengthening, and private sector engagement.

A new paragraph on the project's exit strategy has been added in the sustainability section. It outlines how impact will continue post-project through:

- Empowering community-based institutions and cooperatives;
- Integration with national frameworks like the Green Corridor and local development plans;
- Partnerships with financial actors and service providers;
- Capacity transfer to decentralized structures and platforms;
- Support for viable biodiversity-positive business models eligible for future public or climate financing.

-The revised Prodoc includes lessons drawn from GEF ID 5545, particularly related to participatory governance, tenure security, and livelihood diversification. These best practices have informed the project's design, notably under Components 1 and 2. Reference to GEF ID 5545 has been integrated in the "Baseline, ongoing investments and lessons learned" section.

The revised Prodoc acknowledges the challenges faced in GEF ID 9515 (TRI South Kivu) and incorporates key lessons into the current project design. In particular, it strengthens early engagement with field-level partners through local structures and IPLC organizations that have been pre-identified based on local consultations carried out during the preparation phase and ensures clearer implementation roles. The operationalization of Dimitra Clubs will be guided by an assessment of existing clubs at project start and revised, field-tested approaches. The Monitoring and Evaluation framework has been reinforced with detailed indicators, and a Mid-Term Evaluation is planned in the second semester of the implementation Year 2 (so during the third year of the project out of 5) before project closure, to allow sufficient time for corrective actions. These adjustments are reflected in the Lessons Learned, Output 1.4, and M&E sections of the revised Prodoc.

The Prodoc acknowledges the implementation challenges specific to Eastern DRC and draws on lessons from GEF-funded projects in similar contexts, including GEFID 9760 (WB ? Tumba-Lediima), GEFID 10242 (UNDP ? Kabobo-Luama), and GEFID 10314 (UNEP ? Kivu+). These lessons informed the design of Components 1 and 2, with particular attention to adaptive partnership strategies and capacity support for local actors. Section 1.3 (Baseline, Ongoing Investments, and Lessons Learned) and Section 4 (Implementation and Execution Arrangements) highlight how prior project experiences have shaped implementation modalities, risk mitigation strategies, and institutional coordination mechanisms. The Prodoc also includes a provision for future collaboration with GEFID 10388 (Lake Tanganyika) under Section 1.3, ensuring alignment and synergy once that the initiative becomes operational.

The project will be implemented through operational partnership agreement with both MEDD and ANAPAC. MEDD was fully supportive of the choice of ANAPAC and they both are currently collaborating in the process of developing the strategy for the conservation of nature out of protected areas. ANAPAC has proven track records and legitimacy of supporting IPLC to establish ICCA and promote resilient, sustainable and profitable agriculture for the sustainable maintenance of biodiversity and ecosystems in different provinces of DRC.

The revised Prodoc confirms that the project builds on ANAPAC's experience under the GEF-7 Inclusive Conservation Initiative (GEFID10404), including lessons from ICCAs and community governance models. These insights have informed the project's design, particularly under Output 1.4 and Outcome 2.1. The Prodoc also highlights continued collaboration with ANAPAC during implementation to integrate lessons from the ICCA network. Additionally, the project commits to keeping the regional network REPALEAC informed and aligned with the Regional Strategy for IPLCs in the Congo Basin, ensuring coherence with broader regional frameworks and platforms (cf. Output 3.1.1 & stakeholder engagement table).

The project will be implemented through an operational partnership agreement with the Sustainable Development Department (DDD) of the MEDD and ANAPAC, both of which will oversee procurement and manage local partnerships. DDD underwent its last HACT assessment by UNDP in July 2020 and was rated "Moderate" risk by the firm SECOFICSAPRL (Order No.

COD10-000028049). A new assessment is currently underway for both DDD and ANAPAC, aligned with FAO's due diligence process.

FAO also began implementing OPIM with another MEDD division in mid-2024 under a separate project. Lessons from this experience, alongside the ongoing assessments of DDD and ANAPAC, will inform the final choice of contractual arrangements and identify capacity-building needs.

These findings will be discussed with both partners to refine operational procedures and strengthen project delivery mechanisms.

In line with the recommendation to engage with other initiatives, FAO will consult with ERPA and the World Bank to draw on best practices from GEF ID 9760, particularly regarding support to decentralized authorities (e.g. capacity-building, procedures). These lessons will be used to ensure operational realities are reflected in the OPIM agreements with MEDD and ANAPAC before project start.

Both partner institutions will also benefit from the proximity and support of FAO field offices in Kalemie, Nyunzu, and Kabalo, which will provide regular monitoring and tailored operational assistance throughout implementation.

5. Gender

The Prodoc has been revised to provide more specific and context-adapted gender measures, particularly under Component 2, with emphasis on culturally sensitive entry points and partnerships with local women's groups. Output 3.1.1 now references lessons learned and good practices on women's empowerment, while Outputs 3.1.2 and those under Component 4 explicitly mention the inclusion and leadership of women. Gender-specific indicators and monitoring provisions, aligned with the Gender Action Plan, have been reinforced in the M&E section.

6.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project

- a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**
- b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**
- c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed initiatives (e.g., government, other bilateral/multilateral).**

Secretariat comment at CEO Endorsement Request 2025/02/25 cleared

Agency Response

6.3 GEF Core indicators and GBFF indicators

- a) Are the identified GBFF and relevant GEF core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?**
- b) Are the project's targeted contributions to GEBs (measured through GBFF indicators, relevant GEF core indicators, and additional listed outcome indicators) reasonable and achievable?**

Secretariat comment at CEO Endorsement Request

2025/02/25

1a. The core indicator targets remain small relative to GEF funding. Please increase the targets and/or justify the low cost-efficiency in terms of GEBs of this proposal. In particular, please provide the anticipated type of restoration activities to be carried out and their cost assumptions.

1b. Please provide the target on core indicator 6 with underlying methodology and justification of main assumptions. The target is required at CEO endorsement stage.

1c. As there is a focus on ICCAs, please consider reporting, as appropriate, either on core indicator 1 (if the targeted ICCAs are considered as protected areas in the context DRC) or on core indicator 4.5 dedicated to OECMs, or justify that none of these categories apply in the context of this project.

2025/03/28

1a. The effort undertaken since the earlier version are greatly appreciated. However the figures presented here account only for restoration and only a portion of the budget (\$600,000). If one takes the remainder of the budget to calculate the cost for achieving the target in indicator 4.1 (150,000 ha in landscapes under improved management), we come to about \$33/ha, which is still well above the average for the GEF/GBFF. Please explore all means of reducing this figure significantly, e.g. by adding new sites or expanding existing ones.

Other points are cleared.

2025/04/04 Thank you very much. These efforts are greatly appreciated. This is now cleared.

Agency Response

4 April 2025

The cost of restoration per hectare varies widely, based on a review of past and ongoing GEF projects in the DRC ? from 4.18 to 444 USD. The variance reflects both the starting point in terms of secured land and conflicts and other aspects (terrain, degradation level, etc.). Given the specific context and constraints in Tanganyika, we have revised the area under Core Indicator 4 to 350,000 hectares. This includes 150,000 ha of direct benefits and 200,000 ha of indirect consequential benefits. Therefore, the average cost of investment equals USD 9.18/ha. While the potential for broader impact exists at both national and provincial levels, we think this target reflects an ambitious though realistic estimate of what could be achieved within the project's timeframe and available resources. It is also important to highlight other significant, long-term benefits that are not captured in hectares. A detailed rationale is provided under the Core Indicators table, with further information in the relevant outcomes and outputs.

Earlier responses:

1a. The CI on restoration has been increased to 14,000 ha, and estimative cost per ha has been provided. In particular, the project foresees reforestation activities on 3,000 ha (57\$/ha), natural regeneration through fencing, fire prevention, etc on 7,000 ha (21\$/ha) and the demonstration of agroecological practices on 4,000ha (70\$/ha). ROAM will identify the areas of interest for restoration activities, and cost-efficiency will be considered to align with these estimated costings. Furthermore, these unit costs are based on recently concluded investments in similar ecosystems (including GEF investments highlighted above). The GEF investment dedicated to restoration activities in this GBFF project (portion of component 2) is USD600,000.

1b. EXACT has been used to estimate carbon benefits, and when more detailed baseline information becomes available (after ROAM, mapping) a full estimate will be conducted using NEXT. NEXT will be used as a monitoring tool during implementation.

1c. The project will not operate directly in designated PAs and OECMs. However, the identification of areas for protection will be an integral part of the management planning that the project is intended to conduct. Therefore, once the relevant project activities conducted, further indicators can be informed. Also, the legal framework for OECMs in DRC needs to develop in order to assess eligibility criteria.

6.4 Risks

a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?

b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?

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

Secretariat comment at CEO Endorsement Request

2025/02/25 Some of the risks might be underestimated, notably (i) instability/political volatility, (ii) continued marginalization of IPLCs by majority populations, and (iii) business viability. Please double-check the levels and raise if necessary. Consider adding mitigants (mitigation activities) to maintain the risk at acceptable levels. On point (i), past FAO projects in the region, as well as from other agencies, all faced difficulties and delays of implementation, notably related to the challenges to operationalize the partnerships on the ground and the relatively low capacities of national and local institutions. Please demonstrate that FAO has drawn lessons from these past projects, and propose clear mitigation and adaption measures.

On the broader note of fragility, the current situation in Eastern DRC remains volatile. What specific measures are proposed that are related to Fragility, Violence, and Conflict? (see guidance note https://www.thegef.org/sites/default/files/documents/2024-11/Guidance%20Note%20on%20Fragile%20and%20Conflict-Affected%20Situations_2024.pdf).

Please clarify the measures to protect project teams and partners.

2025/03/28 Thank you, cleared

Agency Response

Following a thorough review, the risk table in Section C4 has been updated to better capture the complex realities of implementing in fragile contexts such as eastern DRC. The project's adaptive, inclusive, and conflict-sensitive approach ensures that risks are actively monitored and mitigated through institutional coordination, local engagement, and targeted safeguards. More specifically:

- Regarding i. The political and governance risk has now been rated as Substantial (increase) to reflect the volatility of the broader eastern DRC context, including inter-ethnic conflict and presence of armed groups. Mitigation measures have been added that draw on lessons from previous FAO interventions in fragile areas, where implementation delays and partnership difficulties arose due to security and institutional constraints. The risk register and adaptive programming approach will ensure real-time responsiveness to emerging threats.
- Regarding (ii) Continued Marginalization of IPLCs: The environmental and social risk rating has been kept as moderate but the narrative has been significantly expanded to reflect the risks of marginalization, elite capture, and inter-ethnic exclusion particularly in land governance and benefit-sharing processes. Mitigation measures have been clarified and strengthened to ensure that IPLC voices are not only included but prioritized in all major governance and resource-related decisions.
- Regarding (iii) Business Viability, the financial and business model risk has been rated Moderate (increase), with mitigation measures enhanced to reflect viability concerns, especially in fragile or remote zones. Mitigation measures are informed by lessons from successful FAO-led models in South Kivu (RGEM) and Miombo forest areas.
- The project now includes a dedicated Workforce Management Plan that will be developed with the OP Partner and added to the OPIM agreement to ensure safety, accountability, and duty of care for project staff and partners and specify how responsibilities are shared.

7 C. Alignment with Programming Strategies, Country/Regional Priorities

7.1 a) Is the project adequately aligned with the GBFF Action Areas and, for MTF projects, with Focal Area objectives?

Secretariat comment at CEO Endorsement Request 2025/02/25 cleared

Agency Response

7.2 Is the project aligned with the National Biodiversity Strategies and Action Plans, National Biodiversity Finance Plans, and/or similar instruments to identify national and/or regional priorities. For MTF projects, is the project aligned with other relevant country and regional priorities, policies, strategies and plans (including those related to the MEAs and relevant sectors)?

Secretariat comment at CEO Endorsement Request2025/02/25 cleared

Agency Response

7.3 Does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat comment at CEO Endorsement Request2025/02/25 cleared

Agency Response

8 D. Policy Requirements

8.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request2025/02/25 cleared

Agency Response

8.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request2025/02/25 cleared

Agency Response

8.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

2025/02/25 We note that FAO attached the Environmental and Social Risk Management Framework (ESMF) with clear timeline, responsibility and budget and stakeholder engagement plan and grievance redress mechanism. The Project's environmental and social risk is classified as Moderate. It is important to draw from lessons from previous projects on fragile, conflict affected situations and propose mitigation and adaptation measures. In addition, please elaborate further to integrate fragile and conflict-affected risk management plan including mitigation and adaptation measures for the most vulnerable population, particularly women, children, and Indigenous Peoples, into the project design based on conflict sensitive analysis.

2024/04/04 Thank you very much for volunteering this additional information which is well received. We strongly encourage FAO to continue engaging very closely with IPLCs and ensuring that they continue fully supporting project design and implementation. This will necessarily increase transaction costs, but the impact of the project as a whole hinges on this. This is cleared.

Agency Response

4 April 2025

Kind consider the following additional points on the engagement of and validation from, in particular, local communities and grassroots actors, including IPs and their representatives. During the PPG, a final feedback meeting was held in Kalemie on 4 December 2024, at the end of the field mission, after the expert team and local partners completed and consolidated data collection. The workshop aimed to validate the findings and gather initial feedback on an updated project outline, reflecting the real-life context and consultations, to inform the next steps of project design. The meeting was attended by CBOs, REPALEF, and provincial stakeholders. In line with FAO's corporate disclosure policy, information will be regularly shared with key stakeholders, including IPLCs in the target territories, through appropriate communication channels. At the local level, the first round of information sharing with IPLCs or their representatives is scheduled after the project proposal is submitted to the GEF committee, once the content is stabilized. More details are now provided in Annex K. The final selection of partner villages will be completed during the inception phase, based on a more detailed assessment of the ecological suitability of community and Indigenous lands. As a result, the next steps of the FPIC process could not proceed during the PPG. Draft agreements are not yet in place but will be developed during the inception phase, drawing on practical examples from REPALEF, ANAPAC, and FAO (e.g., the SWM Programme in Ituri). These details have been added into the Annex K.

Earlier responses

The project's environmental and social risk remains classified as Moderate, but mitigation measures have been strengthened in line with the GEF Guidance Note on Fragile and Conflict-Affected Situations (2024).

In Section C4 (Risk Matrix), the political and governance risk has been elevated to Substantial, with mitigation referencing FAO's Security Officer in Kalemie, the Security Management Plan, coordination with UNDSS/OCHA, and local peace structures. Environmental and social risks now reflect threats related to exclusion, elite capture, GBV, and land disputes.

The Stakeholder Engagement Plan (SEP) is framed as adaptive, with updates planned throughout implementation. A Free, Prior and Informed Consent (FPIC) protocol and an expanded Grievance Redress Mechanism (GRM) including IPLC-specific and GBV-sensitive pathways will be implemented.

Conflict-sensitive tools are embedded in the Gender Action Plan (GAP) and IPPF, with participation tracked through disaggregated indicators. A midterm review will assess safeguard effectiveness and allow course correction.

These enhancements are based on lessons from FAO's past work in fragile settings and are now reflected in Sections C3, C4, and the project's safeguard annexes.

8.4 IPLCs:

a) Has the amount of GBFF project financing to support actions by IPLCs been sufficiently justified and have changes compared to PPG request stage, if any, been adequately justified?

b) If applicable, does Section C 'Project Description' describe the IPLCs who will benefit from the project and detail their role in the project? Have appropriate project tags related to IPLCs been selected?

Secretariat comment at CEO Endorsement Request 2025/02/25 cleared

Agency Response

9 Annexes

Annex A: Financing Tables

9.1 GEF Financing Table and Focal Area Elements: Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available?

Secretariat comment at CEO Endorsement Request 2025/02/25 cleared

Agency Response

9.2 Source of Funds

If using GEFTF resources, does the sources of funds table match with the amounts in the OFP's LOE? Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement Request 2025/02/25 cleared

Agency Response

9.3 Confirmed co-financing for the project, by name and type:

Noting GBFF does not require but encourages co-financing, are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement Request 2025/02/25 cleared

Agency Response

Annex C: Project Results Framework

9.4 a) Have the GBFF indicators and relevant GEF core indicators been included?

b) Have SMART indicators been used; are means of verification well thought out; are the targets appropriate for the total project financing (too high? Too low?)

c) Are all relevant indicators sex disaggregated?

d) Is the Project Results Framework included in the Project Document pasted in the Template?

Secretariat comment at CEO Endorsement Request

2025/02/25

a. Please explain how the shift to sustainable practices to benefit biodiversity (core indicator 4.1) will be defined and measured in practice in the context of this project. The Means of verifications are limited to presence of ?participatory maps?, which are likely not sufficient to guarantee sustainable practices, and ?CFCL certifications?, with no evidence provided that this certification guarantees practices that benefit biodiversity.

b. There are no clear baseline and targets for the outcome indicator under outcome 1 (Number of national or regional policies, regulations, or institutional guidelines revised or newly adopted that explicitly recognize and support IPLC rights and governance in community-based conservation and sustainable management of Communal and Indigenous Lands from project contributions). Please provide baseline and target.

c. The project objective includes increased climate resilience but none of the indicators in the results framework seem to directly measure any improvement related to resilience. Please revise or explain.

2023/05/28 cleared

Agency Response

a. On Core Indicator 4.1 ? Sustainable Practices for Biodiversity

The measurement of sustainable practices has been clarified in the results framework (Component 2, Output 2.1.2). Participatory mapping is complemented by on-site monitoring (restoration techniques, ANR, agroecology, community nurseries), field reports, and geospatial tools (Open Foris/FERM). CFCL certification is one step; biodiversity-beneficial practices are tracked through restoration progress, community-led monitoring, and ecological impact metrics.

b. On Outcome 1 Indicator ? IPLC Policy Recognition

The results framework (Outcome 1.1) now includes a baseline of 0 and a target of at least 4 national or regional instruments. Examples include decrees under the recently revised Conservation Law and IPLC Law, provincial plans, and ICCA guidelines, with room for additional outputs during implementation.

c. On Climate Resilience Measurement

Climate resilience is addressed under Component 2 (Outcome 2.2 and associated outputs), with indicators on household income, livelihood diversification, and adoption of community-led adaptation practices (e.g., forest fire prevention, tree nurseries, agroecological methods). These serve as practical proxies for increased resilience, tracked through participatory M&E and field data.

Annex D: Status of utilization of PPG

9.5 Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement Request2025/02/25 cleared

Agency Response

Annex E: Project map and coordinates

9.6 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?

Secretariat comment at CEO Endorsement Request2025/02/25 cleared

Agency Response

Annex F: Environmental and Social Safeguards Documentation and Rating

9.7 Have the relevant safeguard documents been uploaded to the GEF Portal? Has the safeguards rating been provided and filled out in the ER field below the risk table?

Secretariat comment at CEO Endorsement Request2025/02/25 cleared

Agency Response

Annex G: GEF Budget template

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

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

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

Secretariat comment at CEO Endorsement Request

2025/02/25

The table in the CEO Endorsement Request PDF (which is the document that is circulated to Council and later web posted) is unreadable. We kindly suggest the agency use the template provided in the Guidelines on the Project Cycle and remove the columns 'Total' for each component, 'Unit', 'No. of units', and 'Unit cost', so that there is more margin for the details on the activities implemented. Also avoid pasting an image in the word document to upload in the GEF Portal. The budget table will be reviewed again with the resubmission.

a. Some of what is currently included as component 4 is general project management and should thus be charged under PMC, not on project components (e.g. the budget for steering committees).

b. We note the project is to buy motorcycles under component 1.

- As per guidelines, the use of GEF funds to purchase vehicles is strongly discouraged. Any request to use GEF funding to purchase project vehicles must be justified by the exceptional

specific circumstances of the project/program. The Secretariat assesses such requests and decides whether to approve them, based on following criteria: type of project, operating environment, contribution to achievement of project results, and share of costs covered by co-financing, among others.

- Please justify the need, anticipated use and beneficiaries for motorcycles and explain why they are not covered by co-finance.

- Please also justify why they are charged under component 1, which is linked to the enabling environment, and not to the component dedicated to on-the-ground activities.

2025/03/28

• In the CEO Endorsement Request Portal view, which is the document that must be circulated to Council for review, the budget table is still off the left margin, making it impossible to read the different cost categories. Please revise accordingly.

Activity	Unit	No. of units	Unit cost	Component 1	Component 2	Component 3	Component 4	M&E	PMC	TOTAL	Responsible Entity (insert name of entity receiving funds for execution)
				Total	Total	Total	Total				
Initial consultants											
Legal (Co-financed) - Kinshasa	Month	30	600	0	0	0	0	9,000	9,000	18,000	DDO
Legal (Co-financed) - Kinshasa	Month	60	2,000	20,000	20,000	20,000	30,000	5,000	10,000	120,000	DDO
Legal (Co-financed) - Kinshasa	Month	30	441	13,230	0	0	0	0	0	13,230	DDO
Legal (Co-financed) - Kinshasa	Month	30	1,000	0	0	0	0	0	30,000	30,000	DDO
Legal (Co-financed) - Kinshasa	Month	24	441	0	0	0	0	0	10,584	10,584	DDO
Legal (Co-financed) - Kinshasa	Month	30	500	15,000	0	0	0	0	0	15,000	DDO
Legal (Co-financed) - Kinshasa	Month	60	2,000	60,000	20,000	10,000	30,000	10,000	0	120,000	DDO
Legal (Co-financed) - Kinshasa	Month	48	2,000	72,000	0	0	0	0	24,000	96,000	DDO
Legal (Co-financed) - Kinshasa	Month	48	2,000	96,000	0	0	0	0	0	96,000	DDO
Legal (Co-financed) - Kinshasa	Month	48	2,000	96,000	0	0	0	0	0	96,000	DDO
Legal (Co-financed) - Kinshasa	Month	48	2,000	0	0	0	96,000	0	0	96,000	DDO
Legal (Co-financed) - Kinshasa	Month	30	1,000	0	0	0	0	30,000	0	30,000	DDO
Legal (Co-financed) - Kinshasa	Month	12	441	0	0	0	0	0	5,292	5,292	DDO
Legal (Co-financed) - Kinshasa	Month	30	750	22,500	0	0	0	0	0	22,500	DDO
Legal (Co-financed) - Kinshasa	Month	15	441	6,615	0	0	0	0	0	6,615	DDO
Legal (Co-financed) - Kinshasa	Day	45	300	0	0	6,000	7,500	0	0	13,500	DDO
Legal (Co-financed) - Kinshasa	Day	60	300	18,000	0	0	0	0	0	18,000	DDO
Legal (Co-financed) - Kinshasa	Day	30	300	6,000	0	0	0	0	0	6,000	DDO
Legal (Co-financed) - Kinshasa	Day	30	300	9,000	0	0	0	0	0	9,000	DDO
Legal (Co-financed) - Kinshasa	Day	23	300	6,900	0	0	0	0	0	6,900	DDO
Legal (Co-financed) - Kinshasa	Day	15	300	4,500	0	0	0	0	0	4,500	DDO
Legal (Co-financed) - Kinshasa	Day	15	300	4,500	0	0	0	0	0	4,500	DDO
Legal (Co-financed) - Kinshasa	Day	20	300	6,000	0	0	0	0	0	6,000	DDO
Legal (Co-financed) - Kinshasa	Day	15	300	4,500	0	0	0	0	0	4,500	DDO
Legal (Co-financed) - Kinshasa	Day	25	300	0	0	7,500	0	0	0	7,500	DDO
Legal (Co-financed) - Kinshasa	Day	25	300	0	0	7,500	0	0	0	7,500	DDO
Legal (Co-financed) - Kinshasa	Day	25	300	0	0	7,500	0	0	0	7,500	DDO
Legal (Co-financed) - Kinshasa	Day	60	300	0	0	18,000	0	0	0	18,000	DDO
Legal (Co-financed) - Kinshasa	Day	120	300	0	0	36,000	0	0	0	36,000	DDO
Initial Consultants				468,975	45,000	117,500	163,500	48,500	94,878	937,853	

In the meantime, we reviewed the budget table attached to the Review Form, and have the following comments:

There is a mismatch between the TORs included in the project document and the positions included in the project document (see pages 118 ? 125 in the attached). See examples below:



- Project Director in the budget table seems to have the TORs in the project document for the Project Technical Coordinator (PTC) ? however, the salary for this position for 2.5 years is \$18,000 while the key responsibilities go way beyond the remuneration.
 - In the project document we found the TORs for a Field Technical Assistant, but we could not find this position in the budget table.
 - The two most expensive positions in the budget table, namely Technical Expert ? Kinshasa and CTA (each costing \$120,000) have no TORs in the project document.
 - There is one TOR for Safeguards Expert in the project document, but this position is not in the budget table.
 - While there are TORs for some positions that match those in the budget table (i.e. MEAL expert, IPCL and Gender expert), there are other positions in the budget table with no TORs (i.e. Provincial Technical Lead, Financial Expert, Logistics Expert)
- Please amend the inconsistencies, fill out the gaps, and present the budget table in the correct format. Thank you!

2025/04/04 All comments above are cleared. Thank you

Agency Response

4 April 2025

Kindly see the newly uploaded budget table. Do let us know if the portal glitch persists.

Apologies for the inconsistencies between TORs and budget (due to various translations from French), which have been addressed. Furthermore, some additional TORs can be found. There are now TORs for all PMU members. The realignments clarify the questions above, however do take note that some costs are low, as the profiles are largely co-financed by the MEDD. This is the case for instance for the project director, finance expert in Kinshasa, etc.

Earlier responses

The updated budget has been loaded in the Annexure section, and is available in the prodoc.

a. The budget table has been revised to realign. Kindly note that the PMC is slightly over 5% (5.2%), due to the important auditing costs of the project partners. The steering committee meetings have been reduced in number and incorporated under PMC.

b. A small portion of the project budget (0.3%) has been allocated for the purchase of motorbikes. Motorbikes are the preferred mode of transportation in remote villages inhabited by marginalized IPLCs, as they are more accessible and cost-effective compared to cars, both in terms of maintenance and purchase. The project partners at the decentralized level have a limited fleet of vehicles, and the absence of sufficient transportation could hinder project delivery, oversight, and support.

The proposal to purchase motorbikes is driven by the unique operational challenges of the Tanganyika province, which is characterized by vast, remote areas with poor road infrastructure. These regions can only be accessed by motorcycle, especially during the rainy season, making it a crucial mode of transport for implementing field activities and maintaining regular contact with IPLCs and local governance structures.

The motorcycles will primarily be used by field-based facilitators, technical advisors, and local government extension officers to support community land-use planning, restoration monitoring, grievance redress processes, and capacity-building efforts mainly under Component 2. The updated budget table reflects this.

Beneficiaries will include Indigenous and local communities engaged in land and biodiversity governance, as well as decentralized authorities and technical partners. The number of units is limited, and their use will be tightly managed through the project's operational plan. While some transportation and logistics costs are covered through co-financing (e.g. staff time, fuel, and maintenance), the procurement of motorcycles was not included in partner budgets and is therefore requested under GEF financing to ensure minimum mobility required to deliver results in isolated zones.

Annex H: Blended Finance Relevant Annexes

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

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

Secretariat comment at CEO Endorsement Request

2025/02/25 provisionally cleared since it should be N/A, but the text is obscured by the budget tables from the previous annex so I cannot make sure of this. Please confirm it is N/A.

2025/03/28 cleared

Agency Response

Indeed, the question is not applicable.

The budget has been uploaded again, hoping the Portal glitch has been resolved.

Additional Annexes

10. GEFSEC DECISION

10.1 GEFSEC Recommendation

Is the project recommended for approval?

Secretariat comment at CEO Endorsement Request

2025/02/25 The GEFSEC produced some comments, requiring the proposal to be sent back to the agency for further revision

2025/03/28 Thank you - we are almost there! Please review the handful of outstanding comments. We look forward to hearing back from you.

2025/04/04 Thank you - all comments have now been cleared. The project is hereby recommended.

2025/04/14 Dear FAO Colleagues, as discussed, please resubmit with (i) revised GHG mitigation estimates (core indicator 6), (ii) EXACT calculations underpinning the estimates, and (iii) list of assumptions behind the estimates (you can place these below the figure for core indicator 6 in the CEO endorsement request document). Kindly also (iv) indicate the project's contribution to each relevant GBFF Action Area in section D of the CEO Endorsement request (one short para per action area is sufficient) and (v) spell out HRBA the first time the acronym appears in the CEO Endorsement request.

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

Secretariat comment at CEO Endorsement Request

10.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	2/25/2025	
Additional Review (as necessary)	3/28/2025	
Additional Review (as necessary)	4/4/2025	

**CEO
Approval**

**Response to Secretariat
comments**

**Additional Review (as
necessary)**

4/14/2025

**Additional Review (as
necessary)**