



# Implementing Ecosystem Based Management approaches in the Black Sea LME

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10725

**Countries**

Regional (Georgia, T?rkiye, Ukraine)

**Project Name**

Implementing Ecosystem Based Management approaches in the Black Sea LME

**Agencies**

UNDP

**Date received by PM**

6/16/2023

**Review completed by PM**

8/7/2023

**Program Manager**

Taylor Henshaw

**Focal Area**

International Waters

**Project Type**

FSP

## 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

29th of June 2023 (thenshaw): The CEO Document (portal) must be able to be read as a standalone document. Please fully populate each section of the CEO Document (rather than repeatedly referring the reader to the Agency Project Document and annexes or PIF for detailed project information that is required in the CEO Document) and resubmit. A full technical review can then be conducted by GEF Sec. Thank you.

21st of August 2023 (thenshaw): Partially, comments below identify where critical information from the Pro Doc still needs to be ported over to the portal submission. Responses to comments from **STAP** and **Council** must be directly addressed in the portal submission. Please detail how each STAP and Council comment has been addressed. Most of the matrix responses are not sufficient.

28th of November 2023 (thenshaw):

Yes, the project is aligned with FA elements as presented in PIF.

Please remove all green highlights from the submission

Please upload a consolidated PDF of the Agency Project Document and its associated annexes for circulation to Council

13th of December 2023 (thenshaw): Addressed.

Agency Response

UNDP- 11 Dec 2023

highlights are removed as advised.

Project document and annexes are uploaded in the roadmap.

UNDP -17 Nov 2023

Comments addressed below.

### **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

21st of August 2023 (thenshaw): Partly, please address the following:

- (1) The project objective is truncated. Please correct to "Enhancing Marine and Coastal Protected Area national and regional management and adoption of Blue Economy approaches in the Black Sea to support longterm sustainable livelihoods derived from ecosystem **services**"
- (2) The GEF contribution and co-financing contribution to PMC are not proportional. Please revise these figures so the contributions are proportional. If the GEF contribution is kept at 5%, for a co-financing of \$13,200,000 the expected contribution to PMC must be around \$600,000 instead of \$317,173 (which is 2.4%).
- (3) For Output 1.2, please rephrase to "Agreed national Blue Economy Strategies **in each project country** available to guide EBM policy reforms". This will provide clarity to the output.
- (4) For Output 1.3, please rephrase to "Updated national databases **in each project country** to complement the Black Sea Information System...". This will provide clarity to the output.
- (5) For Output 1.4, please rephrase to "National action strategies **in each project country** developed/agreed to further cooperate...". This will provide clarity to the output.
- (6) Please explain why Output 2.2 includes "proposed for adoption by BSC" rather than "endorsed by the Black Sea countries? The project outcome should be an endorsed revised BS SAP rather than a BS SAP proposed for adoption. Please explain/revise accordingly.
- (7) For the new Component 5, the outcome/output does not include retrospective evaluation. Please revise the output language to accommodate a terminal evaluation.

(8) **Germany Comment:** "The geopolitically highly sensitive context at the Black Sea (e.g. at the coastline of the Ukraine) needs to be addressed as a project risk for the regional cooperation component or at least its implications considered in a more detailed approach on how the funds will be utilized. Terminology used for the guiding concepts and approaches of this proposal, such as 'blue economy'/recovery and 'ecosystem-based management?', ought to be explicitly defined to ensure a close interlinkage between the proposed procedure, intended outcome and the factual results."

\*Please detail where/how this comment was addressed in the submission.

(9) **STAP Comment:** "While the problems are well articulated in terms of impacts of overfishing, pollution, invasive species, etc. a significant shortcoming is that the PIF does not describe specifically how it will support 'longterm sustainable livelihoods' despite this being part of the overall project objective."

\*Please detail where/how this comment was addressed in the submission. (Note: The environmental problems are not as well articulated in the CEO Request Document).

(10) **STAP Comment:** "Planned activities include mapping of priority ecosystems, national blue economy strategies, updated information for the BSIS, updated TDASAP, improved coordination, etc. All of these activities contribute to the overall objective of cooperation between Black Sea states though it is less clear how specifically they will lead to adoption of measures that reduce pressure on the marine and coastal ecosystem and support livelihoods, as indicated in the objective."

\*Please clarify how activities will lead to adoption of measures that reduce pressure on the marine and coastal ecosystem and support livelihoods, as indicated in the objective. This detailed response should also be reflected in the Benefits section of the submission.

28th of November 2023 (thenshaw):

**(1) Not Addressed. The objective is still truncated. Please revise.**

**Project Objective**

Enhancing Marine and Coastal Protected Area national and regional management and adoption of Blue Economy approaches in the Black Sea to support long-term sustainable livelihoods derived from ecosystem

(2) Addressed.

(3) Addressed.

(4) Addressed.

(5) Addressed.

(6) Addressed.

(7) Addressed.

(8) Addressed.

(9) Addressed.

(10) Addressed.

13th of December 2023 (thenshaw): Addressed.

## Agency Response

UNDP- 11 Dec 2023

Addressed.

UNDP -17 Nov 2023

- 1) The WORD version of the CEO had a complete objective ? there was an upload problem. Hopefully addressed.
- 2) The proponents were not aware that the PMC GEF grant and the co-finance contributions had to be equivalent. This has been adjusted (now CF is for PMC is 667,173 USD)
- 3) Included.
- 4) Included.
- 5) Included
- 6) This has been modified to ?? endorsed by each project country and submitted to BSC for consideration and adoption?
- 7) This has been added to the output (it was included as an activity to deliver this output in the ProDoc)
- 8) This is addressed in Annex B of the CEO. Specific points are addressed in the CEO Risk section and terms are defined in Section 1a.1 (in main text and as footnotes)
- 9) The Environmental problems have been elaborated in section 1a.1. A fuller response is provided in Annex B of the CEO to the above comment. In summary: The importance to enhancing management of MPAs and the improvements that will arise to ecosystem services (and consequentially to the livelihoods of coastal communities) are discussed in Section 1.a. 3 of the CEO Endorsement document.
- 10) This is emphasized in the CEO Section 1a.3 (alternative) and Section 6 (GEBs) and summarized in Annex B.

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

Secretariat Comment at CEO Endorsement Request N/A

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

21st of August 2023 (thenshaw): Partly, please address the following:

(1) The co-financing table notes all IOC-UNESCO co-financing as "In-kind" "Recurrent expenditures". Yet, the co-financing letter from UNESCO-IOC (April 2023) notes "The estimated IOC contribution is made up of recurrent expenditure (operational costs) for an estimated amount of 56,462 USD and 1,452,711 USD in investment mobilized or expected to be mobilized". Please include this investment mobilized figure in the co-financing table, separate recurrent expenditure and investment mobilized (separate line items), and explain in the field below the table how the investment mobilized was identified.

(2) The co-financing ratio is just over 1:4, while the ambition is 1:7. It is noted that "Due to political reasons in the region, the co-financing foreseen by active partners during the PPG phase could not be secured". Please elaborate on how the project team and executing and implementing agencies will "make all the possible efforts to secure additional co-financing during the inception phase and first year of the project implementation". What specific actions will be taken to secure additional co-financing?

(3) Given the low level of co-financing and investment mobilized, in the field below the co-financing table please explain what the in-kind recurrent expenditures are from the governments of Georgia, Turkey and Ukraine, and UNDP and UNESCO-IOC and how this co-financing (\$13 million) will contribute to project implementation.

(4) There is \$300,000 in the budget table (10% of the overall project budget) allocated to "office rental". This figure is very high. This line item should be covered by in-kind co-financing. Please seek/utilize a portion of the \$13 million of in-kind co-financing for this project to cover these costs. Please then revise the project budget accordingly, placing the \$300,000 allocated to office rental into the project activities.

(5) **Germany Comment:** "With respect to the co-financing structures and defined actions and/or measures, a discrepancy becomes visible between monetary contribution and its application. Germany would suggest to more precisely define the measures at hand, or alternatively determine possible actions/measures that should be excluded from the proposal."

\*Please detail where/how this comment was addressed in the submission.

28th of November 2023 (thenshaw):

(1) Partly addressed. In Kind co-financing cannot be Investment Mobilized. Please revise

(2) Addressed.

(3) Addressed.

(4) No. 10% of the overall project budget for office space is not an acceptable expenditure. Please cover a portion of this figure through co-financing.

(5) Addressed.

13th of December 2023 (thenshaw):

(1) Addressed.

(4) Addressed.

## Agency Response

UNDP- 11 Dec 2023

1) Changed to 'cash' in CEO (highlighted in blue)

4) Costs of office to the GEF grant have been reduced to 50k\$.

UNDP -17 Nov 2023

1) The UNESCO co-financing has been split into two lines as requested.

The IOC contribution is made up of in-kind support, primarily in terms of providing staff support to the project implementation, both from regular professional and administrative positions. Number of days dedicated to project support have been evaluated and calculated using standard UNESCO rates. The other part of the investment has been identified by matching on-going contributions from Govt of Norway and the European Commission to the IOC for supporting implementation of ecosystem-based approach through regional frameworks.

This additional text on the investment mobilized has been included as a footnote to Table C.

2) By CEO endorsement the PIF co-financing figure had been exceeded. The footnote has been adapted to read Whilst the co-financing identified at PIF has been exceeded, additional contributions have not been secured, as a consequence of the Due to political reasons situation in the region, and covid restrictions limiting new projects the co-financing foreseen by active partners during the PPG phase could not be secured. The project team, the executing and implementing agencies will make all the possible efforts to secure additional co-financing during the inception phase and the first year of the project implementation. This additional co-financing will be reported as part of the PIR process.

The requirement of a 1:7 ratio on co-financing has not been communicated to the proponents at the time the PIF was agreed.

3) The proponents do not accept that a low level of co-financing has been secured given that by CEO submission the agreed figure in the PIF had been exceeded. The co-financing contributions are presented in the letters of co-financing from each partner. This Text on the contribution of the recurrent co-financing from the partners has been added below Table C.

4) The ongoing conflict in the region has significantly increased the costs of office space in Istanbul. To-date the proponents have not been able to secure in-kind contributions of office space from either the Turkish Government or the Black Sea Commission. However, efforts are continuing and, if successful, the resources allocated to office rental will be reassigned to further support the technical objectives of this project.

5) The measures at hand were defined with highest level of precision possible at this stage in order to fit the Project goals. Although the expected co-financing at PIF has been slightly exceeded, the ongoing political crisis in the region has impacted the ability of the PPG stage to attract additional financing as other donor initiatives have stalled in the region. In addition the political situation has rendered the BSC unable to provide any direct support to the project at this stage. The project's focus is on the management of MPAs and actions are primarily related to this and support of policies on BE in the three project countries, in addition to updating the TDA/SAP on the basis of newly available information (including from the GEF WB and FAO projects where relevant). The project will seek opportunities for exchanging information with the Mediterranean Programme on MPA management, linking 'networks of MPA managers'. Section 1a.1 and 3 of the GEF CEO document and Annex B summarises this information.

#### **GEF Resource Availability**



**5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?**

Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): Partly, please address the following:

(1) In Table D, for "Programming of Funds", please note "International Waters" rather than "NA".

28th of November 2023 (thenshaw): Addressed

Agency Response

UNDP 17- N0v 2023

1) Addressed

**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

21st of August 2023 (thenshaw): No, please address the following:

(1) To avoid confusion, please remove the reference to the PPG increase, as this was done at PIF stage.

(2) The amount spent to date and amount committed should not be the same. The amount committed should be the difference between the budgeted amount and the amount spent to date. Also, please provide details of the eligible expenditures (instead of outputs) as presented in Table 1 of Annex 1 of the Guidelines.

(3) Please explain what the contracts for national experts, technical support consultants and PPG team leader were and how these interventions contributed to project design.

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Please see comments below

(3) Please see comments below.

## Agency Response

UNDP 17- Nov 2023

1) This has been addressed

2) The table has on PPG funds utilization has been updated

3)

<b>Experts/Consultants working on PPG</b>	<b>Role</b>	<b>Responsibility</b>
Peter Whalley	Team Leader/Stakeholder specialist	Responsible for integrating material from the PPG team into the UNDP ProDoc/Annexes and the GEF CEO Document
Irina Makarenko	Technical Support Consultant ? Legal & Institutional Framework, Marine Protected area and Climate Change Specialist	Responsible for regional reports to guide and inform project development. Full copies are included in the Annex to the Project Documents
Mamuka Gvilava	National Consultant for Georgia	Responsible for national reports that summarised baseline, stakeholders, legislation, policies and institutions, Threats to MPAs, Blue Economy actions to guide and inform the project development. Included in full in the Project Document Annexes.
Coskun Eruz	National Consultant for T?rkiye	Responsible for national reports that summarised baseline, stakeholders, legislation, policies and institutions, Threats to MPAs, Blue Economy actions to guide and inform the project development. Included in full in the Project Document Annexes.
Galyna Minicheva	National Consultant for Ukraine	Responsible for national reports that summarised baseline, stakeholders, legislation, policies and institutions, Threats to MPAs, Blue Economy actions to guide and inform the project development. Included in full in the Project Document Annexes.
Vasudha Pangare	Gender Specialist	Responsible for Gender Strategy and Action Plan to guide the future project implementation. Included in full in the Project Document Annexes.

Lizandro Racoma Castillo	SES Safeguards Review Specialist	Responsible for the development of Annexes and recommendations for project implementation with regards to Safeguards. Included in full in the Project Document Annexes.
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#### 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

21st of August 2023 (thenshaw): No, please address the following:

(1) Core Indicator 2: The project targeted 418,243 ha at PIF stage and "0.00" at CEO endorsement. Two protected areas were targeted at PIF and none at CEO endorsement. Please explain the change/revise as necessary

(2) Core Indicator 11: The project targeted 5,000 female and 5,000 male (total 10,000) at PIF stage and "0" at CEO endorsement. Please explain the change/revise as necessary

(3) Assuming Core Indicators 2, 7 and 11 will be targeted under this project, please explain in detail the methodologies/calculations used to reach the intended target figures for these three Core Indicators. And in particular, please explain why this project will only directly benefit 10,000 people.

\*Please ensure Core Indicator targets in Table E match those targets included in the Annex A Results Framework.

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

(3) Partly Addressed. Comment above not addressed. "Assuming Core Indicators 2, 7 and 11 will be targeted under this project, please explain in detail the methodologies/calculations used to reach the intended target figures for these three Core Indicators. Core Indicator methodology/calculation field is still empty.

Indicator 8 Globally over-exploited fisheries moved to more sustainable levels

Indicator 9 Chemicals of global concern and their waste reduced

Indicator 10 Persistent organic pollutants to air reduced

Indicator 11 People benefiting from GEF-financed investments

[View](#)

Provide additional explanation on targets, other methodologies used, and other focal area specifics (i.e., Aichi targets in BD) including justification where core indicator targets are not provided

## Part II. Project Justification

13th of December 2023 (thenshaw): Not addressed. Core Indicator field is still empty

Indicator 11 People benefiting from GEF-financed investments

[View](#)

Provide additional explanation on targets, other methodologies used, and other focal area specifics (i.e., Aichi targets in BD) including justification where core indicator targets are not provided

## Part II. Project Justification

14th of December 2023 (thenshaw): Addressed.

### Agency Response

UNDP- 11 Dec 2023

The calculations used to reach the intended target figures for these three Core Indicators are included in the portal.

UNDP- 17 Nov 2023

1) This has been corrected

2) This has been corrected ? no change from PIF

3) This has been rectified and the core indicator targets match with the figures used in the Results Framework

There seems to have been an upload error. Both Table E and presented in the core indicators annexes have been included now.

## 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?**

Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): Partly, please address the following:

(1) This section includes aspects of the environmental problems, barriers, and alternative scenario. Please include only the problems, causes and barriers in this section and move the alternative scenario write up (i.e., the paragraphs on what the project will do at the national and regional level) to the alternative scenario section.

(2) What are the root causes of the environmental problems? (It appears these were presented at PIF and removed at CEO Endorsement). Please clearly specify.

(3) **STAP Comment:** "In the TOC and barriers section, the barriers focus on lack of national capacity, insufficient regional guidance and information and inadequate regional coordination. These may all be valid; however less clear are the specific barriers standing in the way of reducing overfishing, pollution, wastewater discharge, etc. and how specifically they will be overcome through regional cooperation. Presumably, the MSP and EBM and TDA SAP will be more detailed and provide information at the country level. However, more information on general barriers across countries would be helpful. For example, lack of enforcement of fishing quotas? Outdated wastewater technology? Inadequate financial incentives for the tourism sector to discourage industrial waste? Role of local people living in coastal areas?"

\*Please detail where/how this comment was addressed in the submission.

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

(3) Addressed.

## Agency Response

UNDP- Nov 17 2023

1) These issues have been addressed in the revised CEO document (sections 1a.1, 2 and 3)

2) The root causes from the 2009 TDA/SAP have been included and these will be further investigated in the update of the TDA/SAP (sections 1a.1

3) Barriers, problems and causes are summarized in CEO Sections 1a.1, 2 and 3 and will be updated in the revised TDA/SAP. Incentives will be explored in the approaches on national BE strategies (linking with the GEF/WB project)

**2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?**

## Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): Partly, please address the following:

It is noted that baseline analysis (reports) have been carried out for each project country (Annex 14, a,b,c).

(1) The baseline (portal submission) should include a detailed account of the ongoing and planned activities/policies/initiatives taking place during the project period. What will be leveraged to meet project outcomes? Please elaborate accordingly. To this end, please also include a summary of what GEF ID 10558 and 10563 set out to achieve and how those projects and this project have complementarities and are not duplicative. Please clarify if the presented lessons are the gaps in the baseline that are informing the project strategy. If not, please elaborate on the gaps.

\*An updated version of the PIF write up on baseline scenario should be included in this section.

(2) The baseline should also outline potential co-financing sources and who may be approached during the inception phase to secure additional project co-financing. Please include this information accordingly.

28th of November 2023 (thenshaw):

(1) Addressed

(2) Addressed

## Agency Response

UNDP - 17 Nov 2023

1) The baseline (Section 1a.2) has been significantly enhanced with information from the ProDoc including with information on the expectations of the WB and FAO Black Sea projects.

2) This has now been included (Section 1a.2 ? baseline) with the caveat that COVID and the conflict in Ukraine have had an impact on expected projects and programmes in the region.

**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

21st of August 2023 (thenshaw): Partly, please address the following:

(1) In the ToC, please illustrate the linkages between the activities and outcomes. In the current graphic, all activities are causally linked to all outcomes. Is this indeed the case? If not, please revise accordingly.

(2) **Germany Comment:** "While the basic problem statement of different classification criteria for protected areas in BS countries is highlighted in the proposal, Germany suggests to also include ideas for a strategy towards a common classification system."

\*Please detail where/how this comment was addressed in the submission.

(3) **Germany Comment:** "While the highlighting of overlaps and common goals voiced by the EU Green Deal and Recovery Plans and the partaking BS countries - Georgia and Ukraine - is important, Germany requests that other BS countries should not be excluded and a rather cooperative and inclusive approach should be emphasized."

\*Please detail where/how this comment was addressed in the submission.

(4) **Germany Comment:** "While information on the relevance of the proposal in the context of the Sustainable Development Goals is briefly highlighted in the PIF's project paper, the proposal would benefit from including an SDG impact assessment."

\*Please detail where/how this comment was addressed in the submission.

(5) **Germany Comment:** "The indicator framework for EBM ? mentioned in Component 2 ? would benefit from a pre-defined basic set of environmental indicators, that could be expanded and explored in the mentioned participatory processes. This set of indicators should find recognition of the mentioned M&E approach of component 4, where an additional set of indicators for process and project monitoring is suggested. Both indicator frameworks would ideally be considered from the start of the project with a holistic, long-term approach."

\*Please detail where/how this comment was addressed in the submission.

(6) **STAP Comment:** "The assumption is that increased coordination and information and updating of Blue Economy approaches including training on the EBM approach, will lead to enhanced livelihoods from ecosystem services. Lack of detail on the ?how? (i.e., the specific mechanisms and incentives) leaves substantial doubt that the overall objective will be achieved. For example, what are the financial and other incentives that will lead people and institutions to engage in non-polluting or otherwise less harmful activities?"

\*Please detail where/how this comment was addressed in the submission.

(7) **STAP Comment:** "Assumptions and drivers are poorly articulated. ?Maximising ecosystem status and services?? may be considered a motivation of the project (or of certain actors), but how is it a driver of either current trends or shifts in behavior of key actors?"

\*Please detail where/how this comment was addressed in the submission.

(8) **STAP Comment:** "There are many outputs associated with this project. One source of confusion is mention of Marine Spatial Planning (MSP) though mapping seems to be confined to priority ecosystem sites. How does EBM relate to the MSP? This is not entirely clear. Fundamentally absent is information on how specifically people and sectors will benefit from activities under the umbrella of EBM (ecosystem based management) which is the centerpiece of this project. What are the financial and other incentives that will lead people and institutions to engage in non-polluting or otherwise less harmful activities?"

\*Please detail where/how this comment was addressed in the submission.

(9) **STAP Comment:** "It is not clear how mapping priority sites and updating SAPs and improving coordination and information will necessarily result in reduced threats to coastal and marine ecosystems and improved livelihoods. Many assumptions are either excluded or taken for granted. The underlying assumption is that the SAP will result in improved ecosystem status; however, there is no discussion of how the previous SAP has fared in this regard or what were the lessons learned."



\*Please detail where/how this comment was addressed in the submission.

28th of November 2023 (thenshaw):

- (1) Addressed.
- (2) Addressed.
- (3) Addressed.
- (4) Addressed.
- (5) Addressed.
- (6) Addressed.
- (7) Addressed.
- (8) Addressed.
- (9) Addressed.

#### Agency Response

UNDP - Nov 17 2023

- 1) The proponents consider that the ToC presented is a good representation of this integrated project and this has been presented to the countries in the national approval of the UNDP Project Document and at the validation meeting. Additional text has been included from the ProDoc on the ToC.
- 2) The Project will assist in defining criteria for common classification system compatible with BSC and MSFD requirements, as well as fully harmonized with other Regional Seas (i.e. UNEP/MAP). This is described in the CEO Sections 1a.1 (Global Problems), 1a.3 (Alternative ? Component 4), 1a.7 (Innovation) and Section 7 (Consistency with national policies)
- 3) The active participation of the other 3 Black Sea countries will be encouraged with representatives being invited to participate (at their own costs) at meetings, workshops and other regional events, together with the BSC and BSC PS, which also agreed to present the results of these considerations at its regional and global events. Summarized in Section 1a. 3 of the CEO document.

4) A detailed SDG impact assessment has not been undertaken. However, the focus on SDG 14 is extensively made through the CEO document (see for example Section 1a3 (alternative) and results framework which lists the SDGs that this project is also contributing to.

5) The Project will assist the BSC and national governments to propose the unified list of indicators, relevant for BSC annual reporting templates, BSIMAP and MSFD, WFD etc. , requirements and global indicators scheme developed under UNEP, as well as within bilateral commitments of BSC with ICPDR, ACCOBAMS, GFCM etc.. The project will assist with enhancing the BSC indicators building on current work. These will feed into the overall M&E for this project and reflected in the project results framework (Annexed to the CEO document). During project execution it is anticipated that these indicators/targets will be refined as and when they are confirmed by the BSC, and then introduced into BSC work (BSIMAP, annual reporting templates, mutual reporting to ICPDR, ACCOBAMS, GFCM etc). This is summarised in Sections 1a.1, 2 and 3 and Section 7 of the CEO document.

6) Full response in Annex B of the CEO. In addition the approaches are emphasized in Section 1a.3 (alternative) and Sections 6 (GEBS) and 7 (Consistency with national priorities)

7) The Theory of change figure and description (Project Document Section 3.2) has been elaborated and has been presented to the countries. This is summarized in Section 1a.3 of the CEO document)

8) MSP is a useful tool to implement the ecosystem-based approach. Effective MSP is always ecosystem-based (balancing ecological, economic and social goals). The Project will provide solutions (on national and regional levels) on how to ensure that EBM principles and various incentives are taken into consideration during elaboration of national and regional strategies. This, in its turn, would benefit relevant people and sectors. (More detail is in ProDoc Output 1.1. ? Section 3). This is summarized in CEO Sections 1a. 1, 2 and 3. The Project will, inter alia, define the linkages between implementation of EMB and MSP in the region, at the moment there are no concrete mechanisms and/or definitions of what is included in MSP.

9) Mapping of priority sites and updating SAP 2009 has been on the agenda of the Black Sea Commission for more than a decade. There is no doubt that implementation of these initial steps will contribute to improving of coordination and information, which may in its turn result in reduced threats to coastal and marine ecosystems and improved livelihoods. Updated targets in the SAP will stimulate necessary national actions aimed at improving of the ecosystem status. This is summarized in Section 1a.1 and 1a.2 of the CEO document.

**4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?**

Secretariat Comment at CEO Endorsement Request

21st of August (thenshaw): Partly, please address the following:

(1) The text indicates that the project is aligned with IW Objective 1 but does not elaborate on how the project is aligned. Please revise accordingly.

28th of November 2023 (thenshaw): Addressed.

#### Agency Response

UNDP - 17 Nov 2023

1) Additional text has been added to the alignment to GEF IW Objective and how the project contributes to this objective.

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

#### Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): No, please address the following:

(1) Please recast this section to align with what was presented at PIF (updated) (i.e. without the GEF grant.... with the GEF grant...). What is the contribution from the baseline?

(2) Please describe how the GEF increment is mobilizing/will mobilize co-financing to deliver this project.

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

#### Agency Response

UNDP - 17 Nov 2023

The text from the PIF has been updated and included in the incremental reasoning and summarizing the catalytic effect of the GEF grant to focus action on strengthening MPA management.

**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

21st of August 2023 (thenshaw): No, please address the following:

(1) This section needs strengthening. Please frame GEBs using the targets for each of the GEF Core Indicators relevant to the project. Please consider following the example in GEF ID 10782, pasted below:

The proposed project will support the GEF work under the International Waters focal area by addressing transboundary concerns, particularly in terms of reduced threats to marine and coastal waters and sustained marine and coastal ecosystems goods and services. In particular, it will contribute to achieving the following GEF core indicators:

? **GEF Core Indicator 2** - 1,092,720ha of marine protected areas created or under improved management for conservation and sustainable use (ha), contributing to sub-indicator 2.2.

? **GEF Core Indicator 4** - 2,348,170 ha area of landscapes under improved practices (hectares; excluding protected areas)- contributing to sub-indicator 4.1.

? **GEF Core Indicator 7** - 1 shared water marine ecosystems under improved cooperative management - contributing to sub-indicator 7.1, 7.3, and 7.4.

? **GEF Core Indicator 11** - 116,713 males and 116,252 females as direct beneficiaries disaggregated by gender as co-benefit of GEF investment (total number of beneficiaries is 232,965).

These core indicators will be achieved indirectly through the investments made with the resources mobilised through the financial mechanism and coordination actions delivered by the project activities. The project is expected to implement long-term financial mechanisms that will generate revolving funding for marine and coastal ecosystems conservation, restoration, and sustainable use, including through MPAs. The regional coordination actions involving the private sector will promote the adoption of improved practices that minimise negative impacts on these ecosystems. Knowledge systematisation and sharing will promote replication and cooperative management in the whole Caribbean LME, directly benefiting a number of people in the five target countries with capacity building, financial support, economic opportunities, and improved ecosystem services.

The activities to be created and supported by the financial mechanisms will consider feasibility factors that will identify sustainable, long-term solutions that minimise the impact of the activities on globally significant biodiversity, given the Caribbean's status as a biodiversity hotspot, and maximise their contribution to the region's resilience to climate change. The aim of CBF activities is to promote sustainable, effectively managed initiatives that improve and impact Global Targets that include the SDGs, the post-2020 biodiversity targets, and the Paris Agreement. The project is expected to contribute to the following global environmental benefits:

1. **Halting biodiversity loss.** The project will generate financial resources to be used by blue economy initiatives and conservation activities that protect, restore, or improve the sustainable use of marine and coastal natural resources. The use of the resources will be aligned to each country's conservation targets and commitments, supporting the health of ecosystems and of biodiversity. Through the activities it will also create and disseminate knowledge resources that will support actor networks in other regions globally.

2. **Maintenance of ecosystem functions and services.** As mentioned, with increased financial resources and improved coordination, this project is expected to provide funding and generate knowledge resources that conservation practitioners at both national and regional levels can draw upon to improve the results of their initiatives. This will help preserve ecosystem structure and function and result in more productive systems that deliver greater ecosystem services.

3. **Maintain, restore and enhance ecological connectivity.** Marine and coastal species are highly connected and migratory and the management approaches to conserve them need to be connected across jurisdictions. This project will contribute to addressing the issue of fragmented action by supporting the development of a regional knowledge hub and the exchange of experiences among public and private actors. In doing so help sectors transition to an approach which better reflects the ocean's natural processes and connectivity.

4. **Increased ecosystem resilience** (for climate change and other global challenges). The Caribbean SIDS are among the world's most vulnerable to the impacts of climate change and the region is the second most hazard-prone in the world, with significant annual losses accruing in the social and productive sectors due to hurricanes, tropical storms, and cyclones. Strong evidence links environmental conservation with risk reduction. This project will contribute to the protection and sustainable use of coastal and marine resources that play an important role in reducing risks associated with a changing climate.

28th of November 2023 (thenshaw): Addressed.

#### Agency Response

UNDP - 17 Nov 2023

The Core Indicators have been included along with additional text in the CEO.

#### **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

21st of August 2023 (thenshaw): Partly, please address the following:

(1) The sustainability and scaling up write ups are not convincing. Please better demonstrate how the project will be sustainable and has the potential to be scaled up.

28th of November 2023 (thenshaw): Addressed.

#### Agency Response

UNDP - 17 Nov 2023

Additional text has been added to the innovation, sustainability and scaling-up section in the CEO document

#### **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

23rd of July 2023 (thenshaw): Yes

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

N/A

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

21st of August 2023 (thenshaw): No, please address the following:

(1) Please provide a detailed report on stakeholders engaged during the design phase. Which stakeholders were engaged, how and when? Was a validation workshop held? How was input from stakeholders incorporated into project design?

(2) CSOs, Indigenous Peoples and Local Communities and private sector are checked as participating in consultations during the project design. Please specify who these stakeholders are. Please explain how these groups were engaged. For Indigenous Peoples and Local Communities, please describe the consultation process and what principles and guidelines/safeguards were followed for engagement. Note that Indigenous peoples have not been mentioned in the Social and Environmental Risks screening.

(3) The stakeholder table does not provide enough details on the specific stakeholder groups to be engaged in project implementation. For example, which "Ministries"? Which CSOs/NGOs? Which private sector entities? Which academic institutions? How many local fishers? Please specify who these 70 stakeholder groups identified are. These seem to be identified in Annex 8b of the Pro Doc, but should also be concisely reflected in the portal submission.

**(4) STAP Comment:** "The majority of stakeholders are from national governments and institutions. If the objective is to develop an MSP, this will necessitate working with the private sector (including tourism, which is not addressed). The grouping of ?Private sector, projects, intergovernmental and non-governmental organisations? as one category suggests poor attention to differentiation of stakeholder roles."

\*Please detail where/how this comment was addressed in the submission. This ties to Comment 3 above.

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Partly addressed. Indigenous Peoples is still checked yes. Please revise

(3) Addressed.

(4) Addressed.

13th of December 2023 (thenshaw): Addressed.

## Agency Response

UNDP- 11 Dec 2023

**Indigenous Peoples is Unchecked**

UNDP - 17 NOV 2023

1) Details of stakeholder contacts (limited due to COVID) in Georgia and Turkey (not possible in Ukraine due to conflict) are included, together with information on the virtual validation meeting are included in Section 2 (Stakeholders) of the CEO document.

2) As above (limited contacts due to COVID restrictions) with NGO/CSOs and private sector representatives. Details of the contacts are include in Section 2 of the CEO There are no Indigenous Peoples in the region (confirmed by all countries). We assume that the box was ticked in error.

3) Other than the main ministries involved it has not been possible (COVID and conflict) to confirm other specific stakeholder involvement in this project and it this will be undertaken following project initiation. The analysis of potential stakeholders undertaken during the PPG stage indicates the relative importance and influence of the different stakeholders and will be used to guide the prioritization of engagement during project execution.

4) COVID restrictions and military conflict in Ukraine have significantly reduced the in-person stakeholder meetings outside approved events. The focus in the PPG stage has been on analyzing stakeholders that will be potentially interested and documenting their possible inputs and interests. The main engagement path is recognized as during the inception period based on the comprehensive analysis of stakeholders conducted in the PPG stage. This is summarized in the CEO Document (Sections 2, 3 and 4) based on detailed information presented in the Project Document The BSC PS is managing the expert network in the Black Sea uniting representatives from scientific institutes, NGOs, academia, private sector etc. It was agreed to use these contacts in order to reach all these categories during Project implementation.

#### **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**

21st of August 2023 (thenshaw): No, please address the following:

(1) It appears a gender analysis has not been completed. A gender analysis should reflect women's and men's roles, need and knowledge in the project area; the control and decision making process among women and men at the community level in environmental planning/governance; access and control over the management of natural resources; differentiated access to socioeconomic benefits and services. Please incorporate the gender analysis into the CEO Request Document or conduct and upload.

Please describe which women's organizations/interest groups were consulted during project preparation.



(2) It is noted that the project will address gender gaps or promote gender equality and women empowerment; close gender gaps in access to and control over natural resources; improve women's participation and decision making; and generate socioeconomic benefits or services for women". Please reflect in detail these gender perspectives in the project components themselves (alternative scenario section). How is the project going to specifically address these issues?

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

### Agency Response

UNDP-17 Nov 2023

1) The project has been designed in line with national policies on gender and through the work of national experts reports present breakdown of staff for different stakeholders in terms of sex. The Gender strategy acknowledges the need for strengthening the baseline and recommends that the project collects detailed information during the project inception (within Output 4.2) when covid restrictions are not in place and/or conflict situation has been resolved in Ukraine. The available information collected by national consultants (and included in the ProDoc annexes) is now summarized in the CEO document section 3 (gender)

2) This will be encouraged through training and awareness on gender actions (outline in the gender strategy implementation through Output 4.2) and supported by the ongoing SESP reporting and updating. This will be monitored on an annual basis by specific gender indicators and targets to be included in the results framework that will be updated in Output 4.2

### **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

21st of August 2023 (thenshaw): No, please address the following:

(1) It is noted that the private sector has been involved in all stages of the development of the project. This section also states that "multiple private sector groups and organizations involved in the Blue Economy operating in the three countries within the coastal region" have been identified. Please describe which specific stakeholders from the private sector have been identified and how they have contributed to project development. What are the actual specific results of the "comprehensive analysis undertaken in the PPG"?

**(2) Germany Comment:** "Further, Germany appreciates the acknowledgment of importance of the private sector for MCPA. Yet, Germany would like to suggest strengthening the engagement with the private sector, especially regarding component 1, also focusing on detailed anthropogenic influences on the marine environment."

\*Please detail where/how this comment was addressed in the submission.

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Please include the response in the Annex B response matrix

13th of December 2023 (thenshaw): Addressed.

## Agency Response

UNDP - Dec 11, 2023

The response to this comment is already included in Annex B in the last submission. It reads

This is detailed in the three National Reports (Annex 14a, b and c)

Exhaustive engagement with the private sector has not been possible during the PPG stage due to travel/workshops COVID 19 restrictions. However, a comprehensive analysis of the possible stakeholders has been completed (including in UA) through desk review and limited remote calls. The project design anticipates that the direct stakeholder contracts will be made during the project's inception phase utilizing the significant contacts that have been identified in the PPG stage and within interaction with BSC and BSC PS who possesses a wide expert network of scientific and private organizations, NGOs and academia. (see additional explanation in Section 2, 3 and 4 of the CEO Endorsement Document.

UNDP- 17 Nov 2023

1) To-date there has been little direct input with the private sector as this relies on common workshops that were not encouraged under covid restrictions. The analysis has identified the potential stakeholders and direct contact with a few (indicated in the update to the stakeholder

section of the CEO) has been conducted in two of the three countries. The comprehensive analysis that has been prepared at the national level of the stakeholder's interests has been largely desk-based but will serve as a good basis for the project to pursue more active contacts now that covid restrictions have been lifted. Clearly further work in Ukraine will necessitate a cessation of the conflict.

2) Exhaustive engagement with the private sector has not been possible during the PPG stage due to travel/workshops COVID 19 restrictions. However, a comprehensive analysis of the possible stakeholders has been completed (including in UA) through desk review and limited remote calls. The project design anticipates that the direct stakeholder contracts will be made during the project's inception phase utilizing the significant contacts that have been identified in the PPG stage and within interaction with BSC and BSC PS who possesses a wide expert network of scientific and private organizations, NGOs and academia. (see additional explanation in Section 2, 3 and 4 of the CEO Endorsement Document

#### **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**

21st of August 2023 (thenshaw): Partly, please address the following:

(1) This matrix states that "Until the resolution of the current conflict there is no work possible in Ukraine with this project". Please explain how this project can be successfully implemented if the current operating environment continues through to the closure of the project. The risk mitigation measure is not included in the matrix.

(2) **STAP Comment:** "Risk analysis is unconvincing with regards to mitigation measures. For example, ?lack of support from private sector or civil society? would seem to be a very substantial risk, given the need to shift behaviors to affect ecosystem threats and status. Responses indicated suggest a lack of ambition to address the root causes of current trends."

\*Please detail where/how this comment was addressed in the submission.

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

## Agency Response

UNDP - 17 Nov 2023

- 1) The proponents recommend that work commences in two countries and the following has been added to the risk matrix. ?However it would be possible for the project to commence in Georgia and T?rkiye, with Ukraine when the conflict has been resolved.?
- 2) The risks have been further elaborated including the inclusion of the current military conflict in Ukraine. These are presented in Section 5 of the CEO document. The support from civil society is considered ?low risk? with the focus on national strategies on BE and enhancing the MPA management at national and regional levels. Clearly civil society (and private sector and academia) will need to be closely involved and the main stakeholders have been identified (although there has been limited contact due to COVID restrictions during the PPG and conflict in Ukraine).

### 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

21st of August 2023 (thenshaw): No, please address the following:

- (1) Please fully describe the institutional arrangement for project implementation (not just graphically).
- (2) Please describe the composition/roles of each member of the Project Management Unit
- (3) Please describe the roles of national consultants (Team Leader, Assistant, National Consultants) and how they relate to/differ from PMU.
- (4) In detail, please elaborate on the coordination modality with the new GEF Black Sea projects led by FAO and World Bank.

(5) **Germany Comment:** "Germany recognizes that the project complexity and co-ordination is addressed multiple times in the proposal. Yet, we would like to suggest that due to the project span, there should be an indication and possibly definition of cooperation and information sharing among administrative entities in a more elaborate manner."

\*Please detail where/how this comment was addressed in the submission.

(6) **Germany Comment:** "Potential synergies become apparent in the context of the BMU IKI call 19 with a regional cooperation focus in the Black Sea region. Currently, the GIZ programme FELICITY II covers river basin management in the Ukraine, which could offer opportunities for collaboration."

\*Please detail where/how this comment was addressed in the submission.

28th of November 2023 (thenshaw):

(1) Addressed

(2) Addressed

(3) Addressed

(4) Addressed.

(5) Addressed.

(6) Addressed.

#### Agency Response

UNDP - 17 Nov 2023

1) The function of the PMU staff and the national Team leaders/assistants has been added to the coordination section of the CEO

2) This has been added to coordination section of the CEO

3) This has been added to coordination section of the CEO

4) As outline in the PIF and summarized in the CEO document (Coordination section) , this project will facilitate the sharing of information and encouraging participation from the partner project at relevant events. This will be formally undertaken within Output 3.2. The precise modality has yet to be agreed and will be confirmed when all three GEF projects have held their inception meetings.

5) Component 3 of this project is dedicated to regional coordination and information sharing of interventions from donors ? including close cooperation with the GEF World Bank and

FAO projects. This is detailed in CEO Section 1a.3 (alternative and outputs associated with Component 3)

6) The proponents thank Germany for this suggestion to link with on-going river basin projects in the region that discharge to the Black Sea (in addition to the planned cooperation with the Danube)

#### **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

21st of August 2023 (thenshaw): Partly, please address the following in this section:

- (1) What are the national and regional targets of the CBD Aichi goals and GBF targets for marine waters that the project is aligned with?
- (2) What agreed objectives within the EU Association Agreements is the project aligned with?
- (3) What national strategies and policies mainstreaming gender within responsible ministries is the project aligned with?
- (4) How is the project aligned with the ongoing work of the Bucharest Convention and BSC?

28th of November 2023 (thenshaw):

- (1) Addressed.
- (2) Addressed.
- (3) Addressed.
- (4) Addressed.

#### Agency Response

UNDP- 17 Nov 2023

1) The Project is aligned with national and regional CBD Aichi goals and will directly address marine ecosystem component of the Kunming-Montreal Global Biodiversity Framework and

its 23 action-oriented global targets, Actions to reach these targets will be implemented consistently and in harmony with the Convention on Biological Diversity and its Protocols, to which all Black Sea countries are parties to and other relevant international obligations, such as CBD Protocol of Bucharest Convention, ACCOBAMS and GFCM commitments, as well taking into account national circumstances, priorities and socioeconomic conditions. The following groups of targets will be addressed: 1. Reducing threats to biodiversity, 2. Meeting people's needs through sustainable use and benefit-sharing, 3. Tools and solutions for implementation and mainstreaming.

This is presented in Section 7 of the CEO and in Annex B

2) The bilateral Association Agreements between EU and three Black Sea countries (Georgia, Turkiye and Ukraine) created a framework for bilateral cooperation through environmental protection and climate change chapter, while implementation of numerous multilateral environmental agreements (MEA) is requirement of Free Trade Agreement part. Environmental acquis comprises legal arrangements on air quality, water quality, waste management, nature protection, industrial pollution control and risk management, chemicals, noise and climate change as well as horizontal issues covering all areas of environmental management in general. Furthermore, environmental acquis also includes several international agreements. Alignment with the environmental acquis and its implementation require serious investment. Below relevant to implementation of Project parts of AAs are mentioned: Horizontal legislation covers arrangements pertaining to such as Environmental Impact Assessment (EIA), Strategic Environmental Assessment (SEA), environmental liability with regard to the prevention and remedying of environmental damage (ELD) and access to environmental information.

EU legislation on water quality is mainly composed of Water Framework Directive (2000/60/EC) and the linked directives, such as MSFD Directive.

The EU's most important legislation in the field of nature protection are the Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC) on conservation of biodiversity through establishing NATURA 2000 network, and the CITES Regulation (EC/338/97) on protection of species of wild fauna and flora by regulating trade therein.

Regarding Climate Change, there are several legal arrangements in the EU on monitoring greenhouse gas emissions, emissions trading system (2003/87/EC), reducing emissions from sectors not covered by the emissions trading system (Effort Sharing Decision-406/2009/EC and Regulation (EU) 2018/842), carbon capture and storage, controlling F-gases and the protection of the ozone layer, reducing emissions from the transport sector, and emissions stemming from land-use and land-use change.

The Project will mostly cover implementation of MSFD and other water quality and nature protection directives.

This is presented in Section 7 of the CEO and in Annex B

3) The project has been developed to be supportive of national requirements on gender and baseline disaggregated information on women/men in different organisations has been

collected (and presented in CEO Section 3). The Gender Strategy acknowledges additional baseline information is to be collected during the project inception phase through Output 4.2.

4) The activities under this Project are fully aligned with and will significantly contribute to the ongoing work of the BSC, including amendments to all major documents under Bucharest Convention (CBD Protocol; Black Sea SAP 2009; SoE Report; BSIMAP; biological component of the Black Sea Information System (BSIS); creation of basis for the MPAs management and development (creation and twinning of MPAs managers network; update the MPAs guidelines for the Black Sea; introduction of climate change into agenda and main documents of the Bucharest Convention; further assistance to improve coordination with initiatives and partners (Ecologically or Biologically Significant Marine Areas (EBSAs) under CBD Convention, ACCOBAMS, GFCM etc). This is presented in Section 1a1, 1a2 ns 1a3, and Section 7 of the CEO

#### **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

21st of August 2023 (thenshaw): No, please address the following:

- (1) Please provide a timeline for implementing listed knowledge management and communication activities/products and also elaborate on the project's Communications Strategy, including dissemination of KM products.
- (2) Please clarify the budget allocated to KM and communications products/activities by including a simple budget table in the KM section.
- (3) Please describe how the project will be learning from and building on relevant previous/ongoing initiatives in the region and globally
- (4) Please indicate how many people (disaggregated by gender) are expected to benefit from all proposed training and dissemination activities.

28th of November 2023 (thenshaw):

- (1) Addressed.
- (2) Not addressed. Please provide a simple budget table that clarifies the budget allocated to KM and communications products/activities
- (3) Addressed.
- (4) Addressed.



13th of December 2023 (thenshaw): Not addressed. Please add a column to the table and breakdown KM budget per KM/comms product

The following table summarizes the main training and awareness actions that are planned.

Outputs	Dissemination/Awareness Products	Anticipated Quarter
Output 1.1: Priority ecosystems sites and pressures mapped to guide MSPs and to analyse gaps for MCPAs on priority habitat protection	Maps and associate guidance on priority sites	8
Output 1.2: Agreed national Blue Economy Strategies available to guide EB M policy reforms	Draft and final strategies	Draft 10 Final 12
Output 1.3: Updated national databases to complement the BSIS with new components on biological and socio-economic aspects	Updated databases and training	Draft DB 12 Training 12 -16
Output 1.4: National action strategies developed/agreed to further co-operate with relevant IMO projects aimed at reducing threats to bioresources and ecosystems from specific invasive species with regional recommendations for BSC consideration and possible adoption	Draft and final strategies Awareness raising on invasives	Draft 10 Final 11 Training 10 -16
Output 2.1:	TDA/SAP draft and final	Training – 3

14th of December 2023 (thenshaw): Addressed

## Agency Response

UNDP- 11 Dec 2023

The CEO has the following statement.

The anticipated budget for each component on knowledge management (training, workshops and conferences plus web based developments (to be specified and confirmed in the project inception) is approximately 250,000 USD.

UNDP - 17 Nov 2023

- 1) A tentative outline of the main workshop, training, awareness raising products is included in the KM section of the CEO document
- 2) A tentative budget of all the workshops, training events etc. from the project budget table is given in the KM section of the CEO document
- 3) The PMU, with the support of the national Team leaders, UNDP and UNESCO-IOC will keep stakeholders informed (including through the project website) with developments and lessons from relevant projects globally. In particular the project will work closely with the MPA activities of the Mediterranean programme and the actions undertaken by the FAO and GEF projects in the Black Sea
- 4) The total figure has not been estimated, but it is expected but the project will strive to ensure equal representation of women and men

## 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

21st of August 2023 (thenshaw): Yes

Agency Response

**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

21st of August 2023 (thenshaw): Partly, please address the following:

(1) Please include the M&E Plan in the portal submission (which is only included in the Pro Doc).

28th of November 2023 (thenshaw): Addressed.

Agency Response

UNDP - 17 Nov 2023

The monitoring plan has been copied from the ProDoc and included in section 9 (M&E) of the CEO

**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

21st of August 2023 (thenshaw): Partly, please address the following:

(1) A main objective of this project is to support "longterm sustainable livelihoods". The Benefits section does not adequately describe how the project will result in long-term sustainable livelihoods. Please elaborate.

28th of November 2023 (thenshaw):

(1) Addressed.

## Agency Response

UNDP - 17 Nov 2023

The benefits section has been strengthened in the CEO Endorsement document.

## Annexes

**Are all the required annexes attached and adequately responded to?**

## Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): No, please address the following:

### **Budget**

(1) There is \$300,000 in the budget table (10% of the overall project budget) allocated to "office rental". This seems quite high. Please clarify this cost. This line item should be covered by in-kind co-financing. Please seek/utilize a portion of the \$13 million of in-kind co-financing for this project to cover these costs. Please then revise the project budget accordingly, placing the \$300,000 allocated to office rental into the project activities.

(2) There is a \$130,401 lump sum under PMC for all project management staff "dealing with administrative issues to deliver the project". Please present each PMC position as a separate line item/allocation in the budget table.

(a) Personnel assisting the coordination of activities is unjustifiable. The coordination of project activities need to be coordinated by a Project Coordinator/Project Director/Project Manager, not by a generic "Project Staff": otherwise, no one is responsible nor accountable. Please identify the position to coordinate the project activities (same applies to "Project Management staff dealing with administrative issues")

(b) Once the position responsible for managing the project is identified, it has to be charged to PMC. Per Guidelines, the costs associated with the project's execution have to be covered by the GEF portion and the co-financing portion allocated to PMC. When the situation merits (i.e. not enough co-financing funds), the project's staff could be charged to the project's

components with "clear Terms of Reference describing unique outputs linked to the respective component" (paragraph 4 - page 42 of the Guidelines).

(3)

International Consultants	International / regional experts (MPAs/BD/ /Blue Economy-Socio Economic/Information Management) working on Component 1 Outputs. Project Management staff providing technical input to this component.	360,000				360,000			360,000	IOC-UNESCO
International Consultants	International / regional experts (MPAs & invasive species/Blue Economy/Information Management/Climate Change/Gender/TDA-SAP) working on Component 2 Outputs. Project Management staff providing technical input to this component.		382,278			382,278			382,278	IOC-UNESCO

International Consultants	PMU staff assisting with coordination activities with GEF FAO and World Bank projects and other programmes. International /regional technical expert inputs to support capacity development expertise on EBM and Information Management.			195,527		195,527			195,527	IOC-UNESCO
International Consultants	Project management staff supporting the knowledge management and communication activities of the project. International/regional consultants will support stakeholder engagement and implementation of the draft engagement plan, safeguards guidance and monitoring, and leading gender relevant actions that will support the overall ambition of the project to increase equality and women's involvement in national/regional BE activities.				110,654	110,654			110,654	IOC-UNESCO
International Consultants	Project Management staff to support the M&E activities undertaken by the project, supplemented by external consultants to undertake independent mid-term and terminal evaluations.						60,819		60,819	IOC-UNESCO
International Consultants	Project Management Staff dealing with the administrative issues (including reporting) to deliver the project							130,401	130,401	IOC-UNESCO

There are six budget lines that lump PMU staff together to support the delivery of technical components. These lines must be disaggregated by staff position. Please revise accordingly.

\* According to the ToRs, not all PMU positions include technical responsibilities.

Importantly, PMU that do not have technical responsibilities cannot have salary mapped to technical components. Once the disaggregation is done, a full review of the project budget can be conducted.

(4) Please explain here in the review sheet why \$30,000 in computers, printers and software is needed to implement this project. This seems excessive on its face.

### Other Annexes

(5) Please see comments on Annex B - Responses to Project Reviews above. Please revise accordingly.

28th of November 2023 (thenshaw):

(1) No. 10% of the overall project budget for office space is not an acceptable level of expenditure. Please cover a portion of this figure through co-financing.

(2) No, the \$130,401 lump sum under PMC for all project management staff still exists in the table. There are no budget notes included in the Portal submission/associated with the GEF Budget Table.

It is still not clear how these two points are addressed:

a. Personnel assisting the coordination of activities is unjustifiable: the coordination of project activities need to be coordinated by a Project Coordinator / Project Director / Project Manager, not by a generic 'Project Staff': otherwise, none one is responsible, neither accountable. Please identify a position to coordinate the project activities (same applies to 'Prpject Management staff dealing with administrative issues).

b. Once the position responsible for managing the project is identified, it has to be charged to PMC. Per Guidelines, the costs associated with the project's execution have to be covered by the GEF portion and the co-financing portion allocated to PMC. When the situation merits (i.e. not enough co-financing funds), the project's staff could be charged to the project's components with 'clear Terms of Reference describing unique outputs linked to the respective component' (paragraph 4 'page 42 of the Guidelines).

(a) Not addressed. The GEF budget table is not in the correct format and it is not possible to properly evaluate the budget without disaggregation.

Please see Procaribe+ budget table below. Each position must be on its own line.

Expenditure Category	Detailed Description	Component (USDeq.)											Total (USDeq.)	Responsible Entity		
		Component 1	Component 2	Component 3					Component 4		Sub-total	M&E			PMC	
				Sub-component 3.1	Sub-component 3.2	Sub-component 3.3	Sub-component 3.4	Sub-component 3.5	Sub-component 4.1	Sub-component 4.2						
Equipment	1,826.00 IT Equipment costs									1,826					1,826	UNOPS
Equipment	13,358.00 IT Equipment costs									13,358					13,358	UNOPS
Equipment	2,636.00 IT Equipment costs		2,636											2,636	2,636	UNOPS
Equipment	2,700.00 IT Equipment costs		2,700											2,700	2,700	UNOPS
Equipment	540 IT Equipment costs												540		540	UNOPS
Contractual Services - Individual	Project Manager/Regional Coordinator/Lead Technical Advisor (PM/RC/LTA)		142,264	19,665	29,353	275,219	38,013	39,458	27,843	9,722	581,537		108,002	689,539	UNOPS	
Contractual Services - Individual	Operations and Liaisons Support Assistant (OLSA)		19,085	2,031	3,032	28,424	3,927	4,075	18,571	8,056	87,201		95,905	183,106	UNOPS	
Contractual Services - Individual	Operations and Liaisons Support Manager (OLSM)		19,006	4,494	6,707	62,890	8,686	9,017	8,369	2,593	121,762		151,202	272,964	UNOPS	
Contractual Services - Individual	Senior Project Officer #1 (SPO1)	35,124	51,585	16,706	24,936	233,806	32,293	33,521	58,691	19,882	506,544		54,001	560,545	UNOPS	
Contractual Services - Individual	Senior Project Officer #2 (SPO2)		77,648	22,105	32,995	309,370	42,730	44,355			529,203			529,203	UNOPS	

Then, for the PMU positions, please present a matrix here in the review sheet that justifies mapping position costs to the technical components (according to the TORs set out in the annex).

(b) Still not clear. Please see comment above.

(3) See above

(4) The budget table still reflects \$30,000 over Components 1 and 2 for equipment. Please revise/clarify.

(5) Addressed.

13th of December 2023 (thenshaw):

(1) Addressed.

(2) (a) Partly addressed.

**Please ensure figures do not spill across two lines. Totals for technical components 1 and 2 are ###. Please revise table. Please try to separate the descriptions onto the line items corresponding to their budgets.**

In the budget notes please include the clear terms of reference describing unique outputs linked to the respective component.

i.e. "PMU ? PM = \$36,288 - providing technical input and direction on Component 3 (with coordination activities with GEF FAO and World Bank projects and other programmes)"  
What are these unique technical inputs? To technically direct what activities?

i.e. PMU ? Admin Officer = 15,552 - providing guidance and advice on administrative issues to national Team Leader and Assistant on Component 3. What are these unique technical inputs? This is too generic and seems to be more a PMU task than a technical task.

**\*In summary, please incorporate the specific TORs for these positions into the budget notes so we can clearly see the unique outputs that justify covering some of the PMU costs in the technical components.**

14th of December 2023 (thenshaw): Not addressed. Instructions sent to proponents.

15th of December 2023 (thenshaw): Addressed.

## Agency Response

UNDP- 15 Dec 2023

The Project Manager is planned to have a strong technical background and expertise and provide technical input and actively work on the technical deliverable of the project. Therefore his costs need to be covered mainly from the technical components. The Admin assistant is expected to support component related activities, such as specific workshops or products, therefore the assistant is partly charged also to the technical components. Within the PMU the allocation of costs for Project Manager and Admin Assistant has been adjusted. The role of the Admin assistant has been further specified.

In overall, the comments were reflected in the revised version of following documents:

- Annex 7 with TORs ? added more specification on concreted technical input of Project Manager and KM expert
- Budget ? revised budget notes, with further details, which Outputs will be contributed by the PM and KM expert + more fund allocated for the PM, less to Admin assistant

- CEO ER Document ? extended section on the PMU staff description or responsibilities ? change done on the page 59..
- ProDoc ? updated budget notes only

UNDP - 12 Dec 2023

1) Costs of office to the GEF grant have been reduced to 50k\$.

2) The TBWP has been revised? showing the individual positions of the PMU within the Technical Components as separate lines. updated budget is included in the portal as well as in the budget note.

a) Adjusted

b) Adjusted

4) Adjusted in the budget and Budget notes

UNDP - 17 Nov 2023

1) The proponents have not secured support yet from either the BSC or the TR government to provide office space (and services) in Istanbul. An impact of the Ukraine conflict has been a significant rise in the cost of rental of commercial premises in Istanbul (and these prices are continuing to increase). The proponents are continuing their efforts to secure office space as part of a co-financing arrangement, but as a provision a budget allocation for this has been made in the event we are unsuccessful. However, the proponents are hopefully that this can be resolved (for both financial and integration benefits from the PMU being co-located with either the ministry staff or the BSC)

2) The PMU staff have been identified on individual lines. Only the PM and the Admin officer are working on project level management (including reporting). The budget table and notes have been amended.

a) PMU staff working on project components are assisting the delivery of these components. This has been broken down to show regional/international staff and individual PMU staff executing specific aspects of the Component/outputs. The budget table and notes have been amended.

b) The budget table and notes have been amended with regards to the above point.

3) The budget lines have been split as indicated above.

The ToR for the admin officer in the PMU has been made more explicit in the CEO document to indicate responsibility for working with the national Team leader and assistant to ensure

administrative issues required by the project for management and reporting are closely adhered to.

4) It is anticipated that the PMU and the national office assistant will require computers, In addition, 4 printers and 4 pc projectors will be required together with software for all computers. The proponents agree that this is high and are suggesting to reduce the budget allocation to 15,000 USD. The resources have been transferred to national consultant inputs.

Other annexes

Annex B has been elaborated.

### **Project Results Framework**

#### Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): **To be evaluated on resubmission. Please address the following now:**

(1) Please ensure the Core Indicators, which are not populated in the Core Indicators table, match those listed in the Project Results Framework.

(2) Please update Output 2.1 to "endorsed by Black Sea countries", not "proposed for adoption by BSC", unless otherwise explained.

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

#### Agency Response

UNDP- Nov 17 2023

1) The figures for the ha of MPAs has been corrected and is consistent between the core indicators and Project Results Framework

2) This has been corrected.

#### **GEF Secretariat comments**



## Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): Please describe how the following GEF Sec comments at PIF were addressed in PPG:

(1) "By CEO Endorsement, additional clarity should be provided regarding how UNESCO IOC will build national level capacity by involving national agencies and black sea commission centres in the execution of project activities."

(2) "By CEO Endorsement, the Theory of Change will need to be further refined by adding and describing the causal linkages between the foreseen activities and the outcomes." How has the ToC been modified from PIF stage to address this comment?

28th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

## Agency Response

UNDP - 17 Nov 2023

1) IOC will support regional and national capacities by connecting project beneficiaries with the wider community of practitioners involved in LME and national ocean management programmes. For example, project reps will join the Annual LME Consultation Meeting and will get a chance to share and learn from other parts of the world. Similarly, the MSP Global Forum will be useful to the BS experts in order to access resources for mainstreaming marine biodiversity issues into spatial planning approaches. Technical tools developed by IOC (for eg International MSP guidelines, MSP Challenge Games, and thematic training for eg on biodiversity data management) will be made available to the project team. The Global Ocean Teacher Academy, IOC's main capacity development delivery mechanism will be utilized to train BS experts to use state of the art ocean management and research approaches.

2) The ToC has been reviewed and presented to the project partners prior to the validation meeting, and the proponents still believe that it is valid to show the interdependency of the project outputs and components in this way.

## Council comments

## Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): No

(1) "This is acknowledged throughout the document" is not a sufficient response. The responses are not adequately elaborated. Please be detailed in comment responses, rather than in high level summary. The responses need to be reformatted, as it is difficult to follow which response is associated with which comment. Please, line by line, explain exactly how the comment was addressed and/or provide a detailed response to each Germany comment, rather than pointing the reader to the entire document or specific portion of the submission package.

Each Council comment that was not sufficiently addressed has been included in the respective section of the review sheet, marked in blue.

28th of November 2023 (thenshaw): Addressed, but please better explain how the private sector comment from Germany has been addressed in the submission. The reference to the annex reports does not answer the comment re: Component 1.

13th of December 2023 (thenshaw): Addressed.

## Agency Response

UNDP - 12 Dec 2023

This has been expanded in Annex B to the CEO (in red)

The Private sector will be engaged in the identification of threats to the marine environment in both Component 1 (Output 1.1 ? mapping of pressures) and Component 2 (Output 2.1 ? updated TDA)

UNDP - 17 Nov 2023

This has been elaborated in Annex B

## STAP comments

### Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): No

(1) STAP gave the PIF a rating of "major issues to be considered during project design" and strongly encourages the proponents to open a dialogue with STAP regarding the technical and/or scientific issues raised...and provide a report of the action agreed and taken, at the time of submission of the full project brief for CEO endorsement. Please indicate whether the proponents engaged with STAP, and if so, please provide the report of the action agreed and taken. If not, please meet with STAP to ensure STAP comments are fully addressed.

Each STAP comment that was not sufficiently addressed has been included in the respective section of the review sheet, marked in yellow. Please address each comment and, in detail, explain how the comment was addressed.

(2) Please then update the STAP response matrix accordingly. The current level of detail is not sufficient.

\*Many STAP comments have been merged with or labeled "Council comments" in the matrix. Please revise accordingly.

28th of November 2023 (thenshaw):

(1) Addressed.

Agency Response

UNDP- 17 Nov 2023

2) This has been elaborated in Annex B

This seems to be an upload issue. The WORD version of Annex 2 is clear on STAP and Council comments.

**Convention Secretariat comments**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

**Other Agencies comments**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

**CSOs comments**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

**Status of PPG utilization**

Secretariat Comment at CEO Endorsement Request

21st of August 2023 (thenshaw): No, please address the following (as noted above):

- (1) To avoid confusion, please remove the reference to the PPG increase, as this was done at PIF stage.
- (2) The amount spent to date and amount committed should not be the same. The amount committed should be the difference between the budgeted amount and the amount spent to date. Also, please provide details of the eligible expenditures (instead of outputs) as presented in Table 1 of Annex 1 of the Guidelines.
- (3) Please explain what the contracts for national experts, technical support consultants and PPG team leader were and how these interventions contributed to project design.

28th of November 2023 (thenshaw):

- (1) Addressed.
- (2) Not addressed. Budgeted amount is lower than amount spent to date. Remaining amount cannot be \$31,716, as the budgeted amount is lower than the amount spent. Please revise and explain.

<b>Project Preparation Activities Implemented</b>	<b>GETF/LDCF/SCCF Amount (\$)</b>		
	<b>Budgeted Amount</b>	<b>Amount Spent To date</b>	<b>Remaining Amount</b>
<b>71200 - International consultants*</b> <ul style="list-style-type: none"> <li>• PPG Team Leader/Project Document Preparation Specialist</li> <li>• Technical Support consultants x 2 - prepare analyses of legal &amp; institutional frameworks, as well as marine protected areas</li> <li>• SES Review Specialist</li> <li>• National experts for background studies ( Georgia, Turkey, Ukraine) (3 experts x 20 days x 200/day)</li> </ul>	113,000	118,284	31,716

(3) Addressed. Please include the role and responsibility columns in a table below the PPG utilization table in Annex C.

13th of December 2023 (thenshaw): Addressed.

Agency Response

UNDP- 12 Dec 2023

(2) Table revised, the total budget of PPG was \$150,000, out of which \$118,281 has been spent, i.e. the remaining amount is \$31,716. The incurred costs are related to the consultancies for the Component A: Preparatory Studies and Reviews / Component B: ProDoc formulation. No costs were incurred under the Component C (Validation Workshop), since all consultations, including the workshop were held in online format.

(3) Annex C updated ? the roles and responsibilities of individual consultants were added.

<i>Project Preparation Activities Implemented</i>	<i>GETF/LDCF/SCCF Amount (\$)</i>		
	<i>Budgeted Amount</i>	<i>Amount Spent To date</i>	<i>Remaining Amount</i>
<b>Component A and Component B*:</b> <b>71200 - International consultants</b> ? PPG Team Leader/Project Document Preparation Specialist ? Technical Support consultants x 2 - prepare analyses of legal & institutional frameworks, as well as marine protected areas ? SES Review Specialist ? National experts for background studies (Georgia, Turkey, Ukraine) (3 experts x 20 days x 200/day) <b>72500 - Supplies</b>  <b>Component C**:</b> <b>75700 - Workshops</b>	150,000	118,284	31,716
<b>Total</b>	<b>150,000</b>	<b>118,284</b>	<b>31,716</b>

\* Component A: Preparatory Studies and Reviews / Component B: ProDoc formulation

\*\* Component C: Validation Workshop

<b>Experts/Consultants working on PPG Role</b>	<b>Responsibility</b>
Team Leader/Stakeholder specialist	Responsible for integrating material from the PPG team into the UNDP ProDoc/Annexes and the GEF CEO Document
Technical Support Consultant ? Legal & Institutional Framework, Marine Protected area and Climate Change Specialist	Responsible for regional reports to guide and inform project development. Full copies are included in the Annex to the Project Documents
National Consultant for Georgia National Consultant for T?rkiye National Consultant for Ukraine	Responsible for national reports that summarised baseline, stakeholders, legislation, policies and institutions, Threats to MPAs, Blue Economy actions to guide and inform the project development. Included in full in the Project Document Annexes.
Gender Specialist	Responsible for Gender Strategy and Action Plan to guide the future project implementation. Included in full in the Project Document Annexes.
SES Safeguards Review Specialist	Responsible for the development of Annexes and recommendations for project implementation with regards to Safeguards. Included in full in the Project Document Annexes.

Addressed above

**Project maps and coordinates**

Secretariat Comment at CEO Endorsement Request 21st of August 2023 (thenshaw):

Yes

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

N/A

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 N/A

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 N/A

Agency Response

**GEFSEC DECISION**

**RECOMMENDATION**

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

Secretariat Comment at CEO Endorsement Request

29th of June 2023 (thenshaw): No, please address comment and resubmit so a full technical review can be conducted. Thank you.

21st of August 2023 (thenshaw): No, please address above comments and resubmit. Thank you.

\*Please meet with STAP to discuss STAP comments and to ensure all STAP comments are properly addressed.

\*Given the extensive revisions required, GEF Sec may have additional comments on resubmission.

28th of November 2023 (thenshaw): No, please address above comments and resubmit. Thank you.

13th of December 2023 (thenshaw): No, please address above comments and resubmit. Thank you.

14th of December 2023 (thenshaw): No, please address above comment and resubmit. Thank you.

15th of December 2023 (thenshaw): Yes.

#### Review Dates

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
<b>First Review</b>	<b>6/29/2023</b>	
<b>Additional Review (as necessary)</b>	<b>8/21/2023</b>	
<b>Additional Review (as necessary)</b>	<b>11/28/2023</b>	
<b>Additional Review (as necessary)</b>	<b>12/13/2023</b>	
<b>Additional Review (as necessary)</b>	<b>12/14/2023</b>	

#### CEO Recommendation

#### Brief reasoning for CEO Recommendations