

Ecosystem Restoration and Sustainable Land Management to improve livelihoods and protect biodiversity in Nauru

Edit and Submit CEO Endorsement

Basic project information

GEF ID

10161

Countries

Nauru

Project Name

Ecosystem Restoration and Sustainable Land Management to improve livelihoods and protect biodiversity in Nauru

Agencies

UNEP

Date received by PM

2/25/2021

Review completed by PM

6/9/2021

Program Manager

Asha Bobb-Semple

Focal Area

Multi Focal Area

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
3/19/2021:

Yes

Agency Response

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
5/12/2021:

Cleared.

3/29/2021:

Not fully.

a) Output 1.2- Activity 1.2.4- Conduct Strategic Environmental Assessment of draft Nauru Integrated Land

Use Plan. Although GEF can provide support to set up systems for EIA and SEA processes and guidelines, we don't provide funding to conduct EIAs and SEAs. Will this activity be supported by co-financing?

b) Output 2.5-Please include an indicator/target that tracks the development of financial mechanisms and incentives for SLM.

c) Indicator 2.2 only refers to women. We understand the data should be disaggregated, but the indicator should refer to both men and women?

d) Outcome 3 ? Could be more strongly worded ? ?takes steps towards? could indicate that the PA will not be declared during project implementation. Given the length of the project, it seems reasonable to expect the PA would be declared during this time. Additionally re the ending of the Outcome - " with improved ecosystem services and sustainable forest management (SFM)"- are these meant to depict two intended results or processes or types of interventions that are intended to take place in the PAs? SFM is an approach and ecosystem services is more of a benefit. For consistency, it maybe useful for two to be phrased in the same way.

e) The wording of Output 3.1 could be simplified.

f) Output 4.1- The title may be a bit misleading. Capturing traditional knowledge is separate in some ways from Gender, although it needs to be gender inclusive. Maybe rephrase to emphasize that the output will cover these two distinct activities.

g) Output 4.5 and the corresponding indicator 4.2 is better suited under Outcome 1 as it relates to the enabling environment. Additionally, is there any consideration for including as a target- LDN targets set for Nauru.

Agency Response

4/7/2021:

a) Our intention to budget the SEA of the Nauru Integrated Land Use Plan was to apply the first such process ever conducted in Nauru to build relevant capacities and to firmly establish the process. Discussions with the Executing Agencies indicated the potential availability of cofinancing for covering the costs of stakeholder consultations and local travel related to the SEA. However, we could not secure co-financing for the expert to lead the process and are therefore compelled to delete the SEA of the NILUP (Activity 1.2.4) from the project activity plans. Independently, SPREP provides extensive support to Nauru for establishing the SEA process, e.g. through capacity building, technical advice, regional guidelines, linking up with relevant experts, etc.

- b) We have included the new ?Indicator 2.3: Number of long-term fiscal and financial instruments established to enable landowners to engage on SLM? to track the development of financial mechanisms and incentives targeted by Output 2.5.
- c) We have corrected Indicator 2.2 to reflect both women and men: ?Mean increase in net income from SLM over project period by women *and men* adopting the Project?s SLM measures? and corrected the corresponding end-of-project target to reflect the same.
- d) We have rephrased Outcome 3 to reflect that the Protected Area will be declared during the Project?s lifetime and removed the commented inconsistency. The proposed new wording for Outcome 3 is ?Biodiversity in remnant forests conserved and ecosystem services enhanced through the creation of a terrestrial protected area, ecosystem restoration, and targeted habitat and species conservation measures?.
- e) We have simplified the language of Output 3.1 as ?Management plan prepared and required documentation submitted for the declaration of Anibare Bay Protected Area?
- f) In line with the comment, we emphasized the two distinct priorities of Output 4.1 as ?Traditional knowledge and gender aspects of resource use and governance restored and strengthened?.
- g) In line with the comment, we have shifted Output 4.5 and the corresponding Indicator 4.2 to Outcome 1 and made necessary adjustments, incl. in the budget. Though reflecting LDN targets as project targets would be straight forward, the LDN target setting process has not yet started and the lack of knowledge on LDN in Nauru at present does not allow the formulation of meaningful targets at this stage.

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

5/12/2021:

Cleared.

3/19/2021

a) Please clarify the currency of the co-financing letters. Only one (from Digicel) is in AUD. If all are in AUD, please provide the US\$ equivalent.

b) The letters from Department of Commerce, Industry, and Environment, Department of Land Management and Survey, Nauru Rehabilitation Corporation, Republic of Nauru Phosphate Corporation don't match the information in the co-financing table. The Letters indicate in kind co-financing only, while the table has grant and in-kind. Please make the necessary corrections to the letters or the co-financing table.

c) The Digicel letter needs to indicate the amount that will be in kind vs. grant.

Agency Response

- a) All co-financing letters apart from the one from Digicel were stated in USD. Based on comment b) we asked co-financiers to issue new letters of co-financing and used this opportunity to state USD as the currency throughout the letters.
- b) We have revised the letters of co-financing with the additional information as requested.
- c) The Digicel co-financing letter was revised to reflect the requested categorization.

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

6/15/2021:

Please see follow up comments below.

(i) The figures in the budget table in the Portal are not aligned with the columns, so it is not possible to understand what is charged to which source ? please amend (suggestion: you may consider eliminating the columns by year so the space in the columns by component will be wider).

(ii) National Project Manager and Administrative and Finance Assistant are only partially charged to PMC . These costs are to be covered by the GEF and the co-financing portion of PMC. If the National Project Manager is also providing technical functions, please adjust the TOR to indicate same and in order justify expenditure across the components.

(iii) The salary of the Technical Regional Advisor at \$600,000 is significant at 17% of the GEF financing and an outlier for staff costs in typical GEF projects. It is also not clear how one consultant will be able to effectively engage in all the activities as stated in the TOR- *'Given the full-time engagement, the TA will also be responsible for external communication and strategic stakeholder engagement, knowledge*

management, capacity development, gender mainstreaming and social and environmental safeguards'.

Please revise the amount for this position and consider more than one consultant to undertake these tasks.

(iii) SPREP (one of the co-executors) charged \$85,550 for executing costs ? the GEF does not cover unspecified executing costs. Please remove this line item or indicate the specific tasks that SPREP will undertake, with the assigned cost.

6/9/2021:

Cleared.

6/3/2021:

-We note that there is little proportionality between the GEF contribution to PMC (4.7%) and the co-financing contribution to PMC (.3%). As both co-financing and GEF funds are to contribute to the PMC, please increase the co-financing contribution as much as possible.

3/19/2021:

- a) Please include the budget table in the portal submission.
- b) The Audit should be covered by the PMC, please revise.
- c) In keeping with the GEF Program and Policy guidelines, costs for motor vehicles are expected to be covered by the co-financing. Please revise the budget accordingly.
- d) Please clarify what will be covered under the SPREP co-execution costs under M&E.

Agency Response

6/3/2021:

-We note that there is little proportionality between the GEF contribution to PMC (4.7%) and the co-financing contribution to PMC (.3%). As both co-financing and GEF funds are to contribute to the PMC, please increase the co-financing contribution as much as possible.

4/8/2021:

- a) We have included the budget table in the portal submission as requested.
- b) We have shifted audit costs to the PMC and have followed up on all changes to the budget figures triggered by this shift.
- c) We have removed the costs of a vehicle from the GEF budget and adjusted funds in favor of value chain development, LDN target setting and the Early Detection and Rapid Response Plan to strengthen biosecurity. In addition, we secured cofinancing worth USD 35,000 from the DCIE to cover costs of local transportation.
- d) The SPREP co-execution costs under M&E cover i) technical input into the preparation of the Inception workshop content and the review of draft reports, ii) maintenance and update costs of the Nauru Environment Data Portal, iii) telecommunication costs which would include internet, telephone and other related costs to support participation and engagement in Project Steering Committee and annual review meetings, iv) costs for the preparation of project quarterly progress and financial reports, v) administration and maintenance costs for managing project information on the SPREP Project Management Information System, vi) procurement (goods and services) costs to support procurement process, and vii) supervision, execution, and management costs of international consultants and experts as well as the activities that SPREP is directly responsible for. We have added this clarification to the ProDoc, Appendix 7 Costed M&E Plan, p 149; as well as the GEF CEO ER document Section 9 Monitoring, p. 79.

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

3/19/2021

Yes

Agency Response

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

6/15/2021:

Please see follow up comment below.

- Table E, for Indicator 1 and sub-indicator 1.1, please specify the number of Ha expected at CEO Endorsement.

5/12/2021:

Cleared.

3/19/2021:

- a) There is a minor error with the PIF figures in the Pro Doc or the Portal for Core Indicator 6, please correct.
- b) FAO Ex-Act tool mentions construction of new infrastructure (Point 7.3). Please clarify what that may be.
- c) Please provide a breakdown of the types of beneficiaries- small farmers, government personnel etc.

Agency Response

4/7/2021:

- a) Thank you for noting this error. We have corrected the figure of GEF Core Indicator 6 at PIF submission in the ProDoc Appendix 16, p. 191 and the GEF CEO ER Annex F, p. 69.
- b) Thank you for noting the remnant reference to the construction of infrastructure in the FAO Ex-Act tool that we missed to remove from the earlier submission. We have now removed this reference from the FAO Ex-Act tool and have corrected the resulting figure for carbon sequestration benefits throughout the project documentation.
- c) We have provided a detailed breakdown of beneficiaries, including a mapping of beneficiaries against project outcomes and the details of all beneficiary groups in the commented location following CEO ER Table E. Simultaneously, we have placed the same information at the end of ProDoc Section 2.5 Stakeholders.

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

5/12/2021:

Cleared.

3/17/2021:

a) Please expand and include key information from Section 2.3 (Para. 36-45) from the Pro Doc in this section of the portal submission.

b) Additional information from the project document that would be useful in the portal submission include:

- One or two of the maps (Fig. 1,4,5,9)

- Socio economic context, for example gender information

- Land tenure context

- Para 20 and 21

- Para 62 remaining baseline gaps would be important to reflect and how this will be reflected in the discussion in the ToC.

Agency Response

4/7-9/2021:

a) We have inserted the paragraphs including the relevant figure in the portal submission as requested.

b) We have included the requested additional information in the following locations:

a. Additional maps: Fig 4 on p. 13, Fig 1 on p. 14.

b. Socio-economic context, gender information under Section II, 2 1st and 2nd paragraph. Further information on the gender baseline is available under Part II, Section 3 of the GEF CEO ER document.

c. Land tenure context under Section II, 2 3rd paragraph.

d. Para 20 and 21 under Section II, 2, Landscape of intervention

e. We have modified ProDoc para 62 in order to provide a logical transition to the structure of the ToC and have included it in the portal submission.

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

Secretariat Comment at CEO Endorsement Request

3/19/2021

Yes

Agency Response

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

6/3/2021:

Cleared.

3/29/2021:

Not fully.

a) Please include the table on changes to the PIF here.

b) Please include additional details in the portal submission on the project description including the ToC diagram and narrative describing the ToC.

c) ToC- Assumption 8 is very broad, and as presented is outside of the control of the anyone. Please consider an assumption that relates more to ability of the project to respond to or adapt to the impacts of climate change.

d) Please include a specific land related GEB in the ToC- e.g. productive landscapes rehabilitated

e) Outcome 1:

-Given that one of the barriers mentioned is limited cross-sectoral coordination for SLM & biodiversity conservation- the project seems to be missing an opportunity in particular under Output 1.4/Output 1.5, to establish and implement a multi-stakeholder coordination mechanism (that involves all the relevant stakeholders from agriculture, environment, finance, mining etc.) which would eventually be institutionalized. The mechanisms can also play a role in monitoring of progress with respect to SLM, LDN implementation, BD conservation, providing guidance on implementation of the NLUP as well as other aspects of the project related to financial mechanisms. We note this is mentioned in the stakeholder engagement section, but it would be useful to have this prominently featured in the project description to fulfill the relevant Outcome/Output.

-Output 1.3 ?Given potential challenges with internet access, will there be ways for people to access through, say, a public computer? Will there be support for people to learn to use it or receive guidance.

f) Outcome 2:

-Output 2.2: ?Decision-makers on land use have improved information on economic impact of degraded land on present and future socioeconomic development, the value of ecosystem services and economic opportunities of land restoration? indicates that.?

mining plans were put on temporary halt by a Cabinet decision in November 2020. How will this affect the sustainability of the project and maintenance of the PA? The GEF investment runs the risk of being lost without political buy in at a high level.

- Also under Output 2.2 - Under the same Output, we note the idea to mainstream valuation into land use decision making. Is there consideration to mainstream valuation of ecosystems services into the legislation in line with activities under Component 1?

-Activity 2.2.1 ? How will ESV generate sex-disaggregated values?

-Activity 2.3.2 ? Is the total number of people trained 30 (low) or total number of trainers trained 30?

g)Output 3.2- What are the plans for maintaining the nurseries?

h)Output 4.5- This should ideally be placed in Component 1. As presented, it appears that the work to create the enabling environment will be fragmented. LDN and the work that involves identifying the baseline information for monitoring the LDN indicators should all be integrated in under Outcome 1- in particular Outputs 1.2 and Output 1.3. The layout of the ToC also doesn't justify the placement of this activity under the Outcome focused on KM and Monitoring. Although there may be KM activities around LDN, the intervention to strengthen the policy environment around LDN we see as something different and more related to Outcome 1.

-Also, under Output 4.5, Activity 4.5.3 refers to a rehabilitation plan and a restoration plan. Please clarify which type of plan will be undertaken- rehabilitation or restoration.

-Output 3.4- It will be important that any IAS management approaches consider long term sustainability to ensure that there is continued support in the long term. The efforts supported by the GEF should have direct impact on threatened species. It will also be important to coordinate with other initiatives such as the team at SPREP implementing the GEF-6 regional Pacific IAS project. It would be good for the NISSAP to also focus on prevention and for the project to include some work to prevent new IAS. Please provide a connection between the selected species for control and threatened species as well as whether there are existing successful control methods for them.

Agency Response

4/7/2021:

- a) As requested, we have shifted the Table reflecting the changes to the Results Framework against the PIF from Annex A to Part II, 1.a.3 Alternative scenario of the portal submission.
- b) As requested, we have included the entire section on strategy options and causal pathways as well as the theory of change in the portal submission.
- c) We have rephrased Assumption 8 as 'Effective adaptation of project investments to climate change reduces disruptive impacts and increases resilience' to reflect the abilities within the Project's control.
- d) We have revised the ToC by reflecting all details of land-based GEBs through their contribution to relevant GEF Core Indicators in the ToC description (ProDoc para 106) and by adding the cumulated land-based GEBs to the ToC diagram among impacts.
- e) Activity 1.4.1 focuses on the establishment of the legally mandated institutionalized EIA Committee, which will be a cross-sectoral coordination committee that includes representatives of all government departments responsible for land-based sectors as well as government corporations responsible for mining (there is no government department mandated with mining). Similarly, there is no separate Department for Agriculture, and instead agriculture is the mandate of the Executing Agency DCIE. In order to address the comment, we have strengthened the original statement and have further emphasized on the membership of the EIA committee, its form and functions, which go beyond EIA and encompass environmental monitoring, SLM, LDN implementation and biodiversity mainstreaming. We have also made cross-reference to the committee in Activities 1.4.2 and 1.5.2.

-Output 1.3: The DLMS confirmed that there will be a publicly accessible computer within the office premises that allows offline access to the geospatial database and webportal. Guidance on using it will be provided by the staff of DLMS maintaining the database. We have included a relevant statement on this under the description of Activity 1.3.2.

- f) -Output 2.2: There is strong evidence for the start of a transformational shift in Nauru towards sustainable land use at the policy level. The fact that a government decision could be invoked to immediately halt mining when the Project expressed concerns demonstrates the level of political commitment, as this was a historic precedence. According to the DCIE, the majority of the government does not support continued mining. As a further evidence supporting this political commitment, the design of the new port (funded by the GCF and ADB) does not accommodate the exportation of phosphate. The Project will promptly proceed with the valuation of ecosystem services including those generated from 'Anibare Forest', the area facing a remnant threat from mining. The Department of Finance sees the results of this valuation as the ultimate information basis to revise the temporary status of the mining ban to a permanent one.

-Output 2.2: Indeed, the strong intention to anchor the valuation of ecosystem services in legislation was confirmed by the DCIE, with modalities yet to be worked out. Relevant statements to confirm this target were included under ProDoc Section 3.3, description of Activity 1.1.1 and Activity 1.1.3.

-Activity 2.2.1: Different types of ESV (various use and non-use values) assessed through appropriate corresponding methods (e.g. market value, travel cost method, hedonic pricing, contingent valuation, etc., etc.) may produce sufficiently different values among respondents disaggregated by sex. To assess such potential discrepancies, and thereby to highlight potential need for gender-responsive action, ESV is planned to be collected disaggregated by gender.

-Activity 2.3.2: Indeed 30 is the total targeted number of trainees. This figure results from the entire potentially relevant staff of various government departments and the

only local environmental NGO EcoNauru, whose work will benefit from improved extension skills and methods.

g) -Output 3.2: Nurseries should become financially viable businesses with prospects of supplying planting material for long-term government-sponsored restoration efforts. We have added this information in the description of Activity 3.2.2. Nurseries will also be supported under Output 2.5.

h) -Output 4.5: As commented, we have shifted Output 4.5 as new Output 1.6 under Outcome 1. Alongside, we have emphasized that the collection of baseline information and monitoring will largely be done through Outputs 1.2, 1.3, and 2.1.

-Activity 4.5.3: The Project will carry out both rehabilitation and restoration activities. Activities under Outcome 3 will largely be conducted in degraded, but comparatively intact ecosystems that still show a high degree of resilience. Activities here will focus on restoration to recover damaged and degraded ecosystems. On the other hand, Activities under Outcome 2 will largely be conducted in areas that are void of native soil and vegetation layers and where thereby the recovery of original ecosystems will largely not be possible. Here, Activities will focus on rehabilitation of essential ecosystem services, such as soil formation, nutrient cycling, carbon storage, watershed services, provisioning services for food, fiber, timber, etc. We have added a clarifying statement to the description of Activity 1.6.3.

-Output 3.4: Based on the comment we have strengthened the Output's contribution to Nauru's long-term biosecurity and thereby the Project's contributions on threatened species. Rather than including prevention work in the NISSAP, relying on SPREP's regional expertise, experience, and established processes, we propose the development of an Early Detection Rapid Response plan for Nauru as a new Activity 3.4.1. This plan is fully complementary to the NISSAP and will focus on the identification of threats by invasive species, of appropriate mitigation measures and the prevention of further spread and incursions. As requested, we have explicitly emphasized the linkages to the GEF regional IAS project and other initiatives in the description of all Activities under the Output. We now propose to develop a site-specific plan for Anibare Bay be developed for IAS with a holistic view of biodiversity conservation. This should precede determining the priority species or sub-sites and therefore the identification of specific management measures would be premature at this stage. However, SPREP's knowledge base will be used to match prioritized IAS with species-specific mitigation measures.

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

Secretariat Comment at CEO Endorsement Request

3/19/2021:

Yes

Agency Response

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

Secretariat Comment at CEO Endorsement Request

3/19/2021:

Yes

Agency Response

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

3/19/2021:

Yes

Agency Response

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

5/12/2021:

Cleared

3/19/2021:

-Not fully. The portal submission identifies numerous risks to sustainability while the Project Document includes additional information on strategies for sustainability. It may be useful to include this information in the portal submission.

Agency Response

4/7/2021:

Thank you for noting this. We have included the ProDoc Sustainability strategy (para 132) as the last paragraph of the section "Sustainability" in Section II, 7 "Innovativeness, sustainability, and potential for up-scaling" in the portal submission.

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

3/19/2021:

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

5/12/2021:

Cleared

3/19/2021:

a) Thank you for the comprehensive stakeholder engagement plan and the information provided in the portal submission. While we appreciate all of this information, it is important to include in the portal submission, the list of specific stakeholders and their role in implementation of the project (Section 2.5 of Pro Doc) and a brief summary on how they were engaged during the PPG phase. This is particularly important for the landowners as the project interventions will take place on their lands.

d) It is not clear if the Department or Ministry responsible for climate change is included in the key stakeholders. Please confirm? We see that they should also be included in project implementation given the work to consider potential climate change impacts on project activities. If the relevant Department is listed, please highlight their role regarding climate change.

c) We see that the Department of Finance/ equivalent have a role to play in the development of financial mechanisms and incentives. Please consider and include relevant text on this where necessary.

Agency Response

4/8/2021:

- a) Thank you for your appreciation of the stakeholder engagement plan. We have included the list of stakeholders, including their roles, as well as the overview of stakeholder engagement activities, including of landowners in the portal submission, Part II, 2 Stakeholders (p. 46).
- b) Thank you for noting the omission of the Department of Climate Change, which was elevated to the rank of a full-fledged department towards the end of the PPG, before which it was a subordinate Division under the Executing Agency DCIE. Even though consultations were intense, we therefore missed to reflect the Department of Climate Change in an appropriate role in the earlier submission. We have now corrected this by listing the Department and its role in project implementation in ProDoc Sections 2.5 and 4, Appendix 11 Terms of Reference, Appendix 21 Stakeholder Engagement Plan, and GEF CEO ER, Part II, 2.
- c) Based on the comment we have added the Department of Finance, Division of Planning and Aid (PAD) in addition to the Division of Commerce to play a role in the development of financial incentive mechanisms. Amendments were made to ProDoc Sections 2.5 and 3.2 (Activity 2.5.3), Appendix 21 Stakeholder Engagement Plan, and GEF CEO ER, Part II, 2.

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

5/12/2021:

Cleared.

3/19/2021:

The gender analysis and action plan are very comprehensive. There is an opportunity however to include more gender focused language in the wording of the some of the outputs. Please consider.

Agency Response

4/8/2021:

Thank you for your appreciation of the gender analysis and action plan. Based on your comment, we have included more gender focused language in the wording of Outputs

2.4., 2.5, and 4.4. In addition, we have revised the gender focused language of Output 4.1 based on your earlier comment.

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

3/19/2021:

Yes

Agency Response

Risks to Achieving Project Objectives

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

Secretariat Comment at CEO Endorsement Request

5/13/2021:

Cleared.

3/19/2021:

a)Please see comment above on the risk related to the mining in the Protected Area.

b)Availability of International consultants. We recommend using consultants who may be closer to the Asia Pacific region or already working in the Pacific region to reduce the length of delays caused by availability or problems with travel.

c)Please provide further details on the specific risks related to climate change and how the project intends to address these risks. We note the plan to conduct a climate vulnerability assessment at inception, but any preliminary information would be useful at this stage.

d) Given the risk associated with passing legislation and the experience of the R2R project, how will this project do things differently? What are the mechanisms that have and will be put in place to ensure political buy in at the highest level.

Agency Response

4/7/2021:

- a) Please refer to our response under Part II, 3 Alternative Scenario, f).
- b) We have reflected focus on relying on experts already working in the Pacific Region to avoid delays in the strategy of addressing Project Management Risk # 6 in ProDoc Section 3.5, as well as GEF CEO ER Section II, 5.
- c) We have included a climate risk screening in ProDoc Section 3.5, as well as GEF CEO ER Section II, 5.
- d) As opposed to the R2R Project, which had limited local presence in Nauru, the Project has included a dedicated component on securing high-level political buy-in that will be initiated right from the Inception Phase (Activity 4.4.4). In addition, the Executing Agency informed about the strong political support for the policy level targets of the Project by the President of the Republic of Nauru. Furthermore, consultations for the most challenging Project target, the revision of the Lands Act has already been initiated by the Department of Lands Management and Survey, which further demonstrates strong autochthonous interest to carry through relevant legislative changes.

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

5/13/2021:

Cleared.

3/19/2021:

- a) The reporting line for the National Project Manager and the Technical Advisor are not shown clearly in the org chart. Will they both report to the seconded Project Director? Or does the Technical Advisor report functionally to the Project Manager, although he may be contracted by SPREP? If not how will fragmentation of management be avoided?
- b) Any language that may reflect potential execution functions by UNEP should be revised or excluded. Please refer to and revise? UNEP will also provide technical and administrative backstopping (including project appraisal and legal agreement, procurement, oversight of financial management).

Agency Response

4/9/2021:

a) We have included the National Project Director (NPD) in the organizational chart and highlighted that both the National Project Manager (NPM) and the Technical Advisor (TA) will report to the NPD. Whilst the TA is contracted by SPREP and therefore has a contractual obligation to report to SPREP, the TA is part of the PMU and therefore works closely with the NPM on the day-to-day management and administration of the project. Consequently, both will come under the overall management of the NPD seconded by DCIE to provide oversight of the PMU. Both SPREP and DCIE as co-execution agencies report to the Project Steering Committee which is the mechanism that ensures coordination between both agencies. In addition, the NPD's daily oversight, as well as the close collaboration between the DCIE and SPREP will ensure well-coordinated execution.

b) We have removed reference to any language which might imply potential execution functions on behalf of UNEP. The critical sentence was rephrased as 'UNEP will also provide oversight functions (including project appraisal and legal agreement, procurement, oversight of financial management), disburse GEF funds to the two Executing Agencies and review financial reports, will supervise project execution (for example, through supervisory missions), ensure that strategic adaptive management is applied as needed, and will commission the mid-term and terminal evaluations.'

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

5/12/2021:

Cleared

3/19/2021:

No. Please include how the project maybe aligned with Convention related commitments under the UNCCD- e.g. NAP and the UNFCCC NDC.

Agency Response

4/9/2021:

We have slightly modified the relevant section of Appendix 22 Policy & Regulatory Framework and Capacity Analysis on the Project's alignment with national priorities arising from Multilateral Environmental Agreements and shifted it into the main body of the ProDoc (Section 3.6, para 115 on) as well as the portal submission (Part II, Section 7).

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

3/19/2021:

Yes

Agency Response

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

3/19/2021:

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

6/15/2021:

Please see follow up comments below.

The Monitoring and Evaluation plan presented in Portal amounts for \$336,000 - per the Guidelines (page 18), the average cost of M&E in projects up to 5 million is 5% . Please revise, in particular removing the ineligible M&E expenses such as the Audit etc.

5/12/2021:

Cleared

3/19/2021:

Not fully.

- Audits are not eligible M&E costs and should be included in the PMC budget.

Agency Response

4/7/2021:

-Thank you for noting this. We have shifted the costs of financial audits from M&E to the PMC budget and followed up on all triggered changes throughout the PPG documentation (budget files, budget tables, descriptions, M&E plan, procurement plan, etc. throughout the ProDoc & GEF CEO ER).

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

3/19/2021:

Yes

Agency Response

Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request

6/15/2021:

Please see follow up comments on the results framework.

5/12/2021:

Cleared

3/19/2021:

Not fully.

Agency Response
Project Results Framework

Secretariat Comment at CEO Endorsement Request
6/15/2021:

Please see follow up comments below.

-Please include in the portal submission for Annex A the Project Results Framework.
The Annex is currently missing and there is a sentence ?The Project Results Framework
is available as Appendix 4 of the Project Document?.

5/12/2021:

Cleared

3/19/2021:

See comments on gender.

Agency Response

4/8/2021:

Kindly refer to our response under Section II, Gender equality and women?s
empowerment (page 12).

GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request

3/19/2021:

Yes

Agency Response

Council comments

Secretariat Comment at CEO Endorsement Request

5/12/2021:

Cleared

3/19/2021:

Yes

Agency Response

STAP comments

Secretariat Comment at CEO Endorsement Request

5/12/2021:

Cleared.

3/19/2021:

-Please include further information on the beneficiaries. See a similar comment above under the core indicators.

-As requested, please provide a few more maps in the main body of the portal submission (See similar comment above).

-Comments on climate change and resilience are similar to those provided above under the risk question.

Agency Response

4/7/2021:

- Kindly refer to our response to your comment above under Part I, 7, c.
- As requested, we have included further maps on pages 13 and 14 of the portal submission.
- Kindly refer to our response under Part II, Risks to achieving project objectives, c).

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

3/19/2021:

Yes

Agency Response

Project maps and coordinates

Secretariat Comment at CEO Endorsement Request

3/19/2021:

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

6/15/2021:

Please address the follow up comments on the budget, core indicators, Annex for the Results Framework and M&E plan.

6/9/2021:

The project is technically cleared and recommended for endorsement.

6/3/2021:

Not at this time. Please address the follow up comment on the PMC costs.

3/30/2021:

Not at this time. Please address the comments above.

Review Dates

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
First Review	3/30/2021	
Additional Review (as necessary)	6/3/2021	
Additional Review (as necessary)	6/9/2021	
Additional Review (as necessary)	6/15/2021	

**Secretariat Comment at
CEO Endorsement**

**Response to
Secretariat
comments**

**Additional Review
(as necessary)**