

Philippine Rise Integrated Conservation for Enduring Legacies through Ecosystem Support Services (PRICELESS)

Review PIF and Make a recommendation

Basic project information

GEF ID

10568

Countries

Philippines

Project Name

Philippine Rise Integrated Conservation for Enduring Legacies through Ecosystem Support Services (PRICELESS)

Agencies

CI

Date received by PM

3/24/2020

Review completed by PM

10/28/2020

Program Manager

Leah Karrer

Focal Area

Biodiversity

Project Type

FSP

PIF

Part I – Project Information

Focal area elements

1. Is the project/program aligned with the relevant GEF focal area elements in Table A, as defined by the GEF 7 Programming Directions?

Secretariat Comment at PIF/Work Program Inclusion

LK 11/2/20 Cleared. Thank you.

LK 10/29/20 No.

Co-financing: All the co-financing from the Government (US\$ 10M) is classified as “in-kind, recurrent expenditure” that refers to operations costs. Table B indicates the project includes substantial investments. Please provide the definition used to differentiate between the “recurrent expenditure” and “investment mobilized”, and review the co-financing against that criteria.

JS 9/29/2020

Thank you for your revisions throughout the PIF and responses in the review sheet.

The project aims at strengthening the management of a recently declared MPA that meets KBA criteria. It is thus well aligned with the BD-2-7 entry point of the biodiversity focal area strategy. Cleared.

JS 4/3/2020

The PIF proposes to use BD-1-1 as entry point (“Mainstream biodiversity across sectors as well as landscapes and seascapes through biodiversity mainstreaming in priority sectors”). Yet, the project’s main objective is to strengthen the management, or actually set up, a recently announced MPA of 352,290 ha. The project is thus rather aligned with the BD-2-7 (“Address direct drivers to protect habitats and species and Improve financial sustainability, effective management, and ecosystem coverage of the global protected area estate”) entry point of the BD focal area strategy.

Please revise accordingly.

Please clarify that the target area meets the KBA criteria and clarify the GEF increment in terms of global biodiversity benefits. The PIF currently does not make a strong case for a \$4 million investment. It states that the Philippine Rise region is not overexploited (thanks to weather conditions closing the area for half the year) and does not provide documented evidence of impact or projected increases in pressures on biodiversity of global relevance. It is also targets an MPA that apparently would be set up even without a GEF grant and, with its very low co-financing, does not explain how the MPA would reach financial sustainability.

Agency Response

We agree to use BD 2-7 and the change has been made in the PIF. There will be some elements related to mainstreaming, referenced in the document as co-benefits.

The target area (PRMRR) meets KBA criteria and has been submitted. It is also designated as an Ecologically or Biologically Significant Area (EBSA). Information about EBSAs was added to the PIF in Section “1a Project Description”. More can be obtained once the govt. reopens after COVID shut down.

More information was also provided to help justify the case for investment – impacts due to overuse do exist, which we addressed in more detail in the revised PIF, as well as pressure on globally relevant biodiversity. The “establishment” of the MPA is moving it from on paper to in practice. These revisions are included in section “1a Project Description” of the PIF. Hopefully this clarifies the status of the MPA now.

Indicative project/program description summary

2. Are the components in Table B and as described in the PIF sound, appropriate, and sufficiently clear to achieve the project/program objectives and the core indicators?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/27/20 Cleared. The PPG points will need to be addressed.

LK 10/26/20

The following remaining points need to be addressed:

2- During PPG please elaborate on how being part of the NIPAS, including 75% of user fees, ensures financial stability.

4 - The explanation of conservation agreement is useful; however, CAs do not prevent new fishers from entering the area with unsustainable practices. In the CER please elaborate on how the project will ensure the new livelihoods and greater fishing productivity does not lead to greater pressures on the resources.

*6 - While the PMC cost of the co-financing has been increased, it is still only slightly above half of the total PMC costs. Given the GEF: co-financing ratio is 1:2.6, the ratio should be similar for the PMCs. If GEF PMC is 5% then the co-financing should be similar.

7 - More detail on the Theory of Change is needed in the CER, including the connections between barriers, components and outcomes.

*8 - This explanation needs to be incorporated into the text.

JS 9/29/2020 & LK 10/16/20

Thank you for the revisions.

1- outcome 1.1: Please set a target for the MPA's METT score after the project. We note the baseline score is 51.

2-output 1.1.2: thank you for having added financing explicitly as part of the outputs. However, please clarify how financial stability is ensured by being part of the NIPAS. We note that it allows to retain 75% of user fees, but please clarify who are the targets of the fees (fisherfolks? tourist divers? only those using the PRMRR or is it mutualized across PAs?) and elaborate on how this would be sufficient to cover the management costs of an offshore MPA, which are bound to be more than that of a coastal MPA.

3- output 2.1.1: Please reformulate. Our understanding is that the whole area of the PRMMR is already in the process of being designated as a KBA when output 2.1.1, which deals with the strict protection zone only, mention some areas that are to be designated as KBAs. Please confirm that the whole PRMMR is to be a KBA and clarify what are the additional areas mentioned in this output. Are these outside of the PRMMR ?

4- outputs 3.1.1 and 3.1.2: Please clarify the theory of change that links interventions to increase fishing productivity and alternative livelihoods with global biodiversity benefits. The PIF remains unclear on these points. From what literature or past experience is the project drawing to ensure that increasing fishing productivity and providing the foreseen type of alternative livelihoods: 1) does not lead to a rebound effect and higher levels of resource exploitation, and 2) does actually lead to decreased pressure on biodiversity?

5- output 3.1.1: In addition, our understanding of the still rather limited literature on fish aggregating devices (FADs) does not point to FADs as a biodiversity-friendly fishing practice that could be supported by GEF BD funds. Unless authoritative and contextualized evidence shows that the FADs supported by the project would be beneficial for biodiversity, please remove the provision of FADs from the GEF funded activities.

6- The PIF proposes that the GEF covers 54% of the PMC cost, which is disproportionate relative to the co-financing ratio (1:2.6). In accordance with Council decision GEF/C.39.9, please revise to ensure “proportionality” between the PMC covered by co-financing amounts and the PMC covered by the GEF funding.

7 - With regard to the Theory of Change, the figure needs an explanation regarding the relationships between boxes. The Theory of Change also needs to be related to the barriers. In addition, the outputs and activities need to be incorporated and arrows need to be included to indicate the relationships between the noted items. Also Appendix I, which is noted in the text as providing an explanation of the Theory of Change, is missing.

8 - Component 2 is noted to focus on the Strict Protection Zone; however it would seem that most of the outputs noted would be appropriate for the entire Reserve, including Outputs 2.1.1, 2.1.2, 2.1.3 and 2.1.4, which are related to data collection, information management, education and awareness raising. Please provide a justification for only focusing these outputs on the SPZ.

9 - Regarding the Component 3 outputs related to increasing fish productivity, please clarify that these will be related to promoting sustainable fishing. For Outputs related to livelihood alternatives, please explain how the project will ensure these are alternative – and not additional – livelihoods to what stakeholders are already undertaking.

JS 4/3/2020

We note the project does not contain any specific outcome/output related to the financing of the PRMRR and there is no indication in the baseline of how its long-term management is to be funded. Please clarify the financial sustainability plan for the PRMRR and how the project relates to it.

While they don't have to be totally defined at PIF stage, please add indicator to monitor the biodiversity outcomes of the project. Current indicators are all indicator of means.

Please clarify which outputs depend on the adoption of a Republic Act.

Component 1:

The budget for component 1, which reads as entirely composed of organizational and planning work seems high. It is higher than the components that include actual work on the ground. Please justify.

Output 1.1: please clarify why new and different arrangements are necessary compared to other MPAs. We note the explanation in the last paragraph of the section on barriers mentions that distance to the shore demands different arrangements. However, it is somewhat lost in the PIF. The feasibility, cost effectiveness and

practically of a new structure, which would probably have to at least partly rely on existing structures (e.g. patrolling from coast guards, oversight on fisheries by DA-BFAR), should also be discussed.

Output 1.3: Please clarify the added value of a legislative enactment.

Component 2:

Please

- clarify what "strict protection zone" means in the PRMRR.
- clarify why the component is marked as TA when it seems it includes significant investments (enforcement measures, CEPA material).
- consider revising or at least complementing targets with outcome targets, not just indicator of means.

Output 2.1.3 : please clarify what, in the description of this output, “security measures” means and what “informed by CEPA activities” means for security and enforcement measures. Please clarify also the indicator related to collaboration on “at least 80% of illegal activities”. Is it meant to measure collaboration on types of illegal activities?

Component 3:

Please :

- clarify what multiple-use zone means for the PRMRR and clarify why enforcement measures are foreseen only in the strict protection zone.
- clarify why the component is marked as TA when it seems it includes some investments (at least capacity building).
- clarify the theory of change linking the livelihood interventions (3.1.1 and 3.1.2) with biodiversity benefits, including relevant references the project will build upon to ensure it will lead to reduction of pressures on biodiversity. Please do so while considering explicitly the specifics of a remote MPA which will likely preclude the development of usual types of BDFE developed around terrestrial and coastal PAs.
- Clarify the indicator/target related to the “% of users not engaged in any extractive uses within the strict protection zone”. Is it an indicator to measure compliance with the strict protection zone or some extraction is/will be permitted there?
- Measuring the mere *number* of benefit-sharing scheme would not provide a indication of their utility and added-value. Please consider revising.

Output 3.1.1 : Please confirm that the project will also contribute to implementing the strategies and revise the formulation accordingly. Please provide a solid case for the feasibility of value chains based on marine genetic resources from PRMRR. Please also clarify what “localized” stands for in “localized management strategies” and the expected number of municipalities / people to be supported.

Output 3.1.2 : Please clarify why there would be “qualified” beneficiaries (those that accept to comply with rules) when all fishers will have to comply with PRMRR regulations. Please clarify what would be the contribution of the GEF project to this output, and how it would be sustained beyond the project’s lifetime. Please also clarify what “educational support” is in this context.

Output 3.1.3: please clarify this output and consider revising its formulation. What “promoting the use” of the multiple-use zone and “generate options” for sustainable enterprises mean? It is unclear what 3.1.1 would do for institutional development and enterprises beyond what is already covered in 1.1.1, 1.1.4 and 3.1.1.

Agency Response

CI-GEF response 10/26:

2- We confirm that during PPG phase, the project will include information on how being part of the NIPAS, including 75% of user fees, ensures financial stability.

4 - Confirm that during the PPG phase, the project will elaborate on how the project will ensure that new livelihoods and greater fishing productivity does not lead to greater pressures on the resources.

*6 - Co-financing for PMC has been increased to 5%.

7 - The Theory of change will be expanded in the CEO endorsement submission

8. Explanation included in the description of Component 2 in the Alternative Scenario section.

CI-GEF response 10/20:

1. Outcome 1.1: Target was increased by at least 20 points.

2. Output 1.1.2: 75% of the user fees that are retained are used for the entire operations of the protected area. The management plan will detail how this funding will be utilized (e.g. for PA maintenance and logistics, equipment procurement and maintenance, sub-projects with stakeholders). Note that financial sustainability will be expanded during the PPG phase.

3. Output 2.1.1.: the PRMRR is in the process of being designated as a KBA. Output 2.1.1 reformulated.

4. Output 3.1. and 3.1.2: Conservation agreements

5. Output 3.1: FADs deleted from Output 3.1.1

6. Co-financing for PMC adjusted

7. Theory of change updated. Note that the diagram does not include outputs and activities. This will be included in the expanded ToC that will be submitted in the CEO endorsement/ProDoc.

8. The SPZ is almost the entire plateau of the Benham seamount where the benthic (or bottom) biodiversity features are concentrated. Information gaps and communication strategy is particularly needed to further inform policy/management, strengthen enforcement, and gain support from stakeholders with improved appreciation of the Benham Rise.

While outputs are indeed applicable to the MUZ also, this area is mainly for sustainable fisheries for stakeholders involved or complying with the management measures. The MUZ surrounding the SPZ is already with deeper waters (several hundred meters) not easily accessible to conventional scientific studies.

9. With regards to ensuring that activities are focused on alternative and not additional livelihoods, during consultations, it was noted that stakeholders are mainly fishers. Fishers identified lack of alternative livelihood to support them when they are unable to go fishing.

DENR has guidelines for biodiversity-friendly livelihoods (BDFE) and this has been identified as part of the project's intervention. BDFEs seek to make resource utilization more sustainable or even altogether veer away from natural resources exploitations for livelihood activities. The types of BDFEs will be detailed during the PPG since BDFEs can be very specific to the opportunities at the local area.

Further, BDFEs can also be used as part of conservation agreements to ease pressure on fisheries and biodiversity. In the GEF SMARTSeas Project in the Verde Island Passage, marine resource exploitation even outside MPAs was reduced through BDFEs. In one area, the MPA stakeholders were provided with start-up equipment to run their catering services. In another, a business enterprise was improved with training to create new designs of women's accessories (bags, earrings, bracelets, slippers, and the like) from plastic wastes. Another group was provided with training and equipment to produce virgin coconut oil based products such as soap, shampoo, and different massage oils.

CI-GEF response 09/22

Financing was added to output 1.1.2, to make it more explicit that financing for the PRMMR is included in the PRMR management plan for output 1.1.2. More details about how financing will be provided are described in the section "2. Baseline" of the PIF. Basically, there is an Integrated Protected Area Fund which has been set up by government for the collection of fees from fishing that will be used to finance protection. This is approved and will be implemented as part of the management plan. Also, the agencies comprising the PAMB for the Philippine Rise are key agencies with regular budgets who can provide additional commitments for long-term funding— which is also explained now in the PIF.

A few indicators were added, most notably related to hectares under improved management which protects important biodiversity habitat. Any exact numbers left out of the RF will be determined in the PPG phase.

The output was changed to specifically mention a Republic Act, with a back up plan also mentioned- which was how DENR advised us to phrase this. A contingent approach is to lobby to have these measures enacted through an executive issuance from the Office of the President, which is why this is also listed as part of Output 1.1.3.

Component 1:

We reduced the budget here and also reflected co-financing provided by BFAR.

Output 1.1:

After further conversation internally and with govt., we were able to change this and clarify in the PIF that the Protected Area Management Board, now interim, is to become the formal management entity with support from the Project. This does not incur additional costs, as once it is set up, costs are covered by government. How this works is explained better now in the PIF.

Output 1.3:

This is now clear in the PIF. What this does is add the necessary teeth/level of legal protection, beyond a marine resource reserve. There is a govt. process set up to achieve this level of attention, which the Project will help support the govt to move through. Once the legislation is in place, then the PA can receive technical, financial and enforcement related support. Without this legislation, the MPA won't be a govt. priority and is unlikely to receive funding for its management.

Component 2:

“strict protection zone” is where no-taking of resources is allowed. This was clarified in the PIF section “1a. Project Description”.

The component was changed from Technical Assistance to Investment in Table B.

Revised in Table B to reflect outcome targets.

Output 2.1.3:

This output was reworded to reflect enforcement needs. Security measures is basically enforcement, which includes patrolling as well as other means of monitoring who is entering and utilizing resources. The CEPA activities language we removed and this work was reframed to reflect engaging communities via awareness raising so that they better understand and then can better comply with laws. The indicator was also rephrased as the wording was confusing.

Component 3:

- Multiple-use zones are areas where fishing activities are allowed with certain limits as may be set by the PAMB. Strict protection zones are usually called “no-take” zones where no fishing and other extractive activities are allowed. This information is now included in the PIF section “1a Project Description”. Additional enforcement activities were added to the Multiple use Zone area. We agree this was an oversight.

- Changed from TA to Investment

- This is included in the Theory of Change, but more work will be done to further clarify BDFEs during the PPG phrase, which is mentioned in the PIF.

--Yes, this is for compliance, no extraction is permitted. Changed the wording of the indicators to reflect this better.

--This was initially changed to monetary benefits provided as the indicator, but then we opted to remove it as we are not sure we can track this. We will revisit during PPG phase.

Output 3.1.1:

--Yes the project will contribute in implementing the strategies – this language change was made to the output.

-- Value chain work will need to be done as part of the project, to further refine which of these are most viable, which was added into the section “3. Alternative scenario and outcomes”. Pertinent background was also added into the section “2. Baseline Scenario). The word localized was removed and the output made more specific by adding number of municipalities and number of people anticipated to be impacted. Information and context behind why and whom the project will engage various groups of people was also provided in section “2. Baseline scenario).

Output 3.1.2:

The term “qualified” was removed and the output was reworded to better capture the idea intended which is to develop programs for tuna fishers to incentivize compliance with rules and regulations. GEF funding will support the start up for existing government supported social protection schemes, as well as conservation incentive agreements (community based). These will be further developed in the PPG phase.

Output 3.1.3:

This was changed to reflect more of an information sharing, training and capacity building set of activities with the intent of making it more clear what is permissible in the multiple use zone, including various livelihood alternatives, and the importance of managing this area as part of protecting the no take or strict protection zone.

Co-financing

3. Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines, with a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/26/20. Cleared.

Seeking additional co-financing and clarifying existing amounts is a priority for PPG.

JS 9/29/2020 1- Table C (total co financing 4,364,000) is not consistent with table B (total co financing 4,364,000). It seems table C has not been updated since last submission. Please correct. Provided the \$10,364,000 figure is confirmed, we note the improvement in co-financing (1:2.6 ratio from 1:1 in the previous submission), the difficulties reported on securing co-financing due to the COVID-19 situation and that the project anticipates that "once allocations for enforcement

efforts, fisheries infrastructure/production support, and marine research efforts are fully captured, this figure may substantially increase". We however note that investment mobilized remains very low (1:0.05) and, alongwith co-financing, it would have to be consolidated during PPG.

JS 4/3/2020 Co-financing is very low (barely above a 1:1 ratio in table C) and is all in-kind. The PIF mentions an even lower level of co-financing in the section dedicated to incremental reasoning. The amounts of investments related to the Philippine Rise reported in the baseline are however in the order of 110 million USD, with 96.5 million from the proposed executing agency over 2018-2028 on the establishment of well-connected MPAs. Please consolidate co-financing or justify thoroughly this low level of financing and the project's viability under these terms, including its sustainability.

Agency Response

CI-GEF response:

The co-financing from the government is funding that will be provided for the management of the PMRR. Co-financing will contribute to the goals of this project and will be used during the duration of the project. Since these are government expenditures, these are considered in-kind and recurrent expenditures. Co-financing that is investment mobilized will be secured during the PPG phase.

CI-GEF Response 10/20:

The project recognizes that overall co-financing ratio is low (including investment mobilized) as compared to the baseline projects. Additional forms of co-financing will included at the time of CEO endorsement, including co-financing from the private sector.

Co-financing from CI are grants that will be mobilized for project implementation.

CI-GEF Response 09/22:

Co-financing has been updated. The amount included in the PIF is the absolute minimum level of co-financing. This number will be updated/increased during the PPG phase. Securing co-financing commitments from government partners was difficult due to COVID-19 and the lockdowns.

GEF Resource Availability

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

Secretariat Comment at PIF/Work Program Inclusion

JS 4/6/2020

Yes, cleared.

Agency Response

The STAR allocation?

Secretariat Comment at PIF/Work Program Inclusion

JS 4/6/2020

Yes, cleared.

Agency Response

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion

JS 4/6/2020

Yes, cleared.

Agency Response

The LDCF under the principle of equitable access

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Impact Program Incentive?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Project Preparation Grant

5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)

Secretariat Comment at PIF/Work Program Inclusion

JS 4/6/2020

Yes, cleared.

Agency Response

Core indicators

6. Are the identified core indicators in Table F calculated using the methodology included in the correspondent Guidelines? (GEF/C.54/11/Rev.01)

Secretariat Comment at PIF/Work Program Inclusion

LK 10/16/20

Cleared

JS 4/6/2020

Please clarify the status of the MPA. If it has been created but is not yet registered in WDPA please clarify in the PIF that it will be duly registered as part of the project. Please report the baseline METT score, which is provided in table B, in table F.

Please add a target for core indicator 11, dis-aggregated by gender, and explain in the PIF the methodology used to set the target.

Agency Response

BMB submitted this to IUCN, should be reflected in upcoming updates. The METT has been assessed. The baseline score is included in Table B.

Core Indicator 11 added
Project/Program taxonomy

7. Is the project/ program properly tagged with the appropriate keywords as requested in Table G?

Secretariat Comment at PIF/Work Program Inclusion
LK 10/16/20
Cleared

Agency Response

Part II – Project Justification

1. Has the project/program described the global environmental / adaptation problems, including the root causes and barriers that need to be addressed?

Secretariat Comment at PIF/Work Program Inclusion
LK 10/16/20
Cleared

JS 4/6/2020
Please:

- clarify from the onset that all project activities are to take place in the EEZ.

- justify explicitly that the targeted area meets the criteria of the global KBA standard

- clarify the extent of the pressure on the target area, with references. The PIF mentions IUU as the main pressure but refers to the draft PRMRR management plan that is not available. Clarify notably the status of the “proposal” to make the Philippine Rise a “protected food supply exclusive zone: to what extent prospection

and exploitation of mineral resources has already been banned and to what extent bioprospecting and the exploitation of genetic resources, which is part of the project, is limited by this “proposal”.

- clarify the status of the draft PRMRR management plan. The PIF criticizes its content but it is not clear to what extent this document has been already been agreed upon and when it is supposed to be adopted.

-revise the barrier analysis. The 3 institutional barriers mentioned do not seem to justify a \$4 million investment on their own, and the project proposal goes beyond addressing these three barriers (enforcement, livelihood options, etc.)

-clarify in barrier 2 what are the security measures in place / considered and how they (would) contradict conservation efforts in the PRMRR.

- clarify in barrier 3 why the PRMRR would provide blue carbon options. It is not clear from the environmental impacts described in the PIF how ecosystem management could increase mitigation.

- clarify also in barrier 3 what are the existing benefit-sharing mechanisms for genetic resources in the Philippines, that a new dedicated system could put in place, and to what extent it is anticipated that the PRMRR could give rise to significant benefits.

- Clarify in barrier 3 what is meant by “The aspired institutional procedure is distinct and separate from the institutional mechanism referred to by the agencies consulted during the barrier analysis consultation that ensures effective inter-agency collaboration.” Does it mean the agencies consulted during the barrier analysis are not interested in a benefit-sharing mechanism?

Agency Response

-- Yes, PRMRR and FMA1 are all in the EEZ. And this is further shown in the map. And the targeted area meets criteria of KBA standard and has been submitted formally to be listed as a KBA. This information is now also mentioned in section “1a Project Description”.

--Most of the threats and pressures information needs to be further assessed/information is limited, and has not been forthcoming from the govt. during COVID, but what could be found has been referenced and included. More digging will be done in the PPG phase.

-- PR’s declaration as a Fisheries Management Area is confirmation of such “proposal”. At present the Interim PAMB is drawing up plans to delineate the zones where various levels of activities will be allowed. This information, and more details about other government commitments relevant to this topic is now clarified in the PIF.

--The PRMRR management plan is a draft as it has not yet been approved by the Interim PAMB, it has gaps and will be improved through results from this Project, but it is important because it represents the updated summation of official thinking on PRMRR – we will be able to state more definitively where it stands in coming months. The govt. has been largely shut down under COVID and non responsive to this among other key questions..

--Barrier analysis has been completed revised and expanded to include enforcement, livelihoods and other issues addressed by the Results Framework that were missing in this section.

--This basically references situations where buoys were placed in sensitive reef areas, among other examples of unintended actions from enforcement agencies harming ecosystems.

--This barrier was changed and we removed the focus on blue carbon—seemed tangential, and not relevant to the project.

--The Philippines as a Party to the Nagoya Protocol has the established institutional and policy framework of which these benefit-sharing mechanisms are part and parcel. The dedicated system seeks to institutionalize this benefit-sharing mechanism in the organizational structure that will manage the PRMRR once the requisite policy issuance is put in place. Upon further reflect and discussion with got, inclusion of genetic resources was removed as it did not seem core to the project.

--This text has been removed. The earlier intent was to build in work on inter-agency procedures but this is already covered elsewhere.

2. Is the baseline scenario or any associated baseline projects appropriately described?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/16/20

Cleared

JS 4/6/2020

Please :

- remove the paragraphs that are duplicates of paragraphs in previous sections (para. 3-5)
- clarify the current status of the PRMRR, which is not yet registered in the WDPA. Clarify in the PIF what the Presidential Proclamation No 489 entails in practice (What activities are allowed in the current strict protection zone, what management measures have been put in place and what resources have been already allocated?)
- clarify the added-value of a “Republic Act” compared to current arrangements.

- expand the description of the relevant current and proposed programs and projects so that their nature, scope and size can be understood (for example what is supposed to mean “NSC-UPMSI Philippine Rise Program (2019)” or “(HEIs) the private sector counterpart of SUCs” ?).
- clarify what are “on-going conservation programs” by DA-BAFR that were considered relevant to the project to be added in Table 1.
- clarify links with relevant regional initiatives, such as under PEMSEA

Agency Response

- These paragraphs have been removed.
- PRMRR submitted to the WDPA May 2020.
- Republic Act value add has been clarified in the PIF, Section 1a about the Project Overview, and Section 2) baseline information. PRMRR Republic Act has value because it will allow for the establishment of a PAMB, it will secure yearly funding from the Government through the Government Appropriations Act, and help pay for the implementation of the PA Management Plan. All of the aforementioned including legislation through a Republic Act are requirements for the PRMRR to become a full-fledged NIPAS Protected Area. This detail was added to the section 2. Baseline Scenario of the PIF.
- These programs have been described more clearly.
- This has been added.
- links to PEMSEA have been added to the KM section.

3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/16/20

Cleared

JS 4/6/2020

Please address the comments of the second comment box in the alternative scenario description as appropriate.

Please also :

- confirm in the PIF that, as part of the project, the targeted areas will be classified as KBAs and registered in the global KBA database.

Agency Response Alternative scenario updated and confirmed that the required information was submitted to IUCN

4. Is the project/program aligned with focal area and/or Impact Program strategies?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/27/20 Cleared

LK 10/16/20

Please see above comments.

JS 4/6/2020

Please see comment in the first comment box.

Agency Response Updated

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

Secretariat Comment at PIF/Work Program Inclusion

LK 10/16/20

Cleared

JS 4/6/2020

The increment that the GEF grant would bring in terms of global biodiversity benefits is not clearly articulated. The PIF does not document strong pressures on biodiversity of global relevance (stating on the contrary that the target zone is not overexploited thanks to weather patterns) and the MPA to be strengthened is apparently already in the process of being set-up by the government without GEF's intervention. Solving supposedly inefficient institutional arrangements, which is brought forward as the main contribution of the project, does not seem to justify a \$4 million investment.

Please clarify the GEF increment in terms of global biodiversity benefits compared to the baseline scenario where the PRMRR is set up without the GEF grant.
Please also clarify:

- the likeliness of a “Republic Act” to be adopted without the GEF project.
- the added-value of the GEF project if “Republic Act” fails to be adopted during the project.

Please delete or make sure the co-financing amounts mentioned in the last paragraph of this section are consistent with that of table C.

Agency Response

--These concerns have been better addressed through rewriting this section. More information on the threats to BD, what is needed to strengthen protection that won't otherwise happen without GEF support, and a better rounded focus on the numerous gaps that exist and barriers that need to be addressed to improve management effectiveness are now included.

Co

-Incremental costs clarified, and strengthened.

-Likelihood of Republic Act discussed and options if it is not passed are presented too

--completed

6. Are the project's/program's indicative targeted contributions to global environmental benefits (measured through core indicators) reasonable and achievable? Or for adaptation benefits?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/16/20

Cleared

JS 4/6/2020

Since the project is to strengthen the management of an MPA being currently set-up, and thus with a low baseline METT score, the target under core indicator 2 should be achieved without difficulties.

Please add a target for core indicator 11.

Agency Response Core indicators updated

7. Is there potential for innovation, sustainability and scaling up in this project?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/16/20

Cleared

JS 4/6/2020

Please clarify why and how the management approaches that will be applied to PRMRR would catalyze innovation in other PAs?

We note that sustainability seems to rest on the adoption of legislative act containing institutional and financial provisions. Please clarify the likeliness of the adoption of such an act during the course of the project. Please also clarify what would happen and the project strategy for sustained results if it was not adopted during the project.

Comments for the box related to Map and Coordinates which is currently experiencing technical difficulties

A map is provided. Please provide coordinates.

Agency Response

Content was added to better show how the project would catalyze innovation in other PAS, which are planned for the Philippine EEZ. and also referencing the opportunities to provide lessons learned/cautionary tales. Over the past few months of 2020, the Committee on Natural Resources of the Congress of the Philippines has indicated their interest in the development of the Philippine Rise Bill establishing the Protected Area.

The sustainability of the PA does depend on the enactment of the legislative measure, or other measures which are now included in the PIF. The earlier thinking on sustainability has been refined in the revised PIF. It is more clear now how this will be achieved.

Project/Program Map and Coordinates

Is there a preliminary geo-reference to the project's/program's intended location?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/16/20

Cleared

Agency Response

Stakeholders

Does the PIF/PFD include indicative information on Stakeholders engagement to date? If not, is the justification provided appropriate? Does the PIF/PFD include information about the proposed means of future engagement?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/26,20 Cleared

Strong stakeholder engagement, including consideration of indigenous groups, is critical to all GEF projects. The identification, inclusion of stakeholders and consideration of impacts during PIF were quite limited. Far greater effort is needed during PPG to be reflected in the CER.

LK 10/16/20

The Stakeholders section is sparse. Please:

- a) Provide a more detailed list of stakeholders. For example, more specific than “Private sector companies (fisheries related)”.
- b) Provide more information on Stakeholders engagement to date, including number of meetings and how many stakeholder groups were represented. Clarify if there are any Indigenous Peoples and if they have they been consulted.
- c) Provide at least a cursory idea of how each stakeholder group will be affected by the project and how they will be engaged in project execution.

JS 4/6/2020

Please provide information on stakeholder engagement to date.

We note that only broad categories “LGUs”, “Academic and research institutions” of stakeholders are mentioned, which is too coarse, even at PIF level. While it does not have to be totally defined at PIF stage, please refine the stakeholder analysis. Please note that there seems to be a copy/paste issue in the last column of the table.

Agency Response

CI-GEF response 10/20:

a) A list of stakeholders was included in the PIF, inclusive of fishing associations in the area. In terms of private sector companies, according to BFA (Capture Fisheries Division), there are no large scale fishing companies operating in Benham, only medium-scale operators that are privately owned. These private medium scale operators are also members of the fishing associations already identified.

b) The main local stakeholder consultations were made in Infanta, Quezon (21-23 May 2019) and Naga, Bicol (30 May 2019) where the different fishing associations were gathered by BFAR.

DENR was responsible to engage academic institutions (UP- MSI, UP-IMLOS, UP-NIGS, etc.), NGOs (CI, WWF, Rare, Oceana, Daluhay), and other relevant national government agencies (BFAR, PNP, PCG, DENR-MGB, NAMRIA, National Coast Watch, NEDA).

There was one round of consultations per major group and another one to gather everyone.

While IPs are present near the coast, they are mostly from the mountains and do not venture out to the PRMRR and were not identified as key stakeholders.

c) Column included on how each stakeholder group will be affected by the project

CI-GEF response 09/15:

Stakeholder section updated

Gender Equality and Women’s Empowerment

Is the articulation of gender context and indicative information on the importance and need to promote gender equality and the empowerment of women, adequate?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/27/20 Cleared. Further details on the role of women and how the project will impact them are anticipated in the CER/Pro Doc.

LK 10/26/20 No.

While the additional information is appreciated, it is not specific to the Philippines or to the project and was not added to the PIF. Please revise the PIF to include information on the role of women in fisheries in the region and how the project is likely to affect women.

LK 10/16/20

The PIF notes the importance of gender considerations for fisheries in general, but neglects to discuss related to the project. Please provide at least initial thoughts on gender considerations related to the project, such as the role of women in fisheries in the region and how they are likely to be affected by the project. Also please confirm that the project will further assess gender aspects during the PPG phase, including a description on planned gender responsive measures/activities to address gender gaps or promote gender equality and women's empowerment.

JS 4/6/2020

We note the intention to develop a gender mainstreaming plan during PPG. However, the integration of gender in project design and description is limited to part of output 3.1.1 at this stage.

As per GEF guidelines on gender equality (SD/GN/02), please provide:

-A summary of preliminary findings on gender, including the gender-specific context of the project, elaboration of any identified gender differences and gaps, and description of any potential gender differentiated impacts and risks relevant to the activity.

- Findings from initial stakeholder consultations relevant to gender, such as barriers/opportunities for women and men to participate as stakeholders, beneficiaries and decision makers in project development and subsequent implementation.

- an elaboration on how the planned project outcomes could be enhanced by attention to gender equality and women's empowerment,
- a list of any activities to be undertaken in the project development phase, such as gender analysis, plans to collect sex-disaggregated data and information, including any considerations about gender expertise in the project team, and associated resource availability.

Agency Response

CI-GEF response 10/26/2020:

Gender section revised. Note that the impacts of the project on women is plan of the gender analysis that will be done during the PPG phase.

CI-GEF response 10/20:

Gender section updated with the following information:

In most of the Asian countries, women are actively involved in many aspects of fisheries. Fishing, including aquaculture, and their associated downstream activities, like fish processing, are among the most depressed economic activities. Women from poor fisher households are involved in fish processing and distribution, aquaculture, small-scale artisanal fishing and fish mongering, but less often in commercial fishing using bigger vessels.

Women also contribute to the generation of wealth, the preservation of aquatic ecosystems, and the maintenance of households and communities in rural and coastal regions. They make up half the workforce and play a prominent role in fisheries and aquaculture economies around the world (Food and Agriculture Organization of the United Nations [FAO], 2018; The World Bank, 2012).

The project will consider the following gender specific interventions. Note that during the PPG phase, a gender analysis will be completed that will include a description on planned gender responsive measures/activities to address gender gaps or promote gender equality and women's empowerment.

- Sensitize and empower women as well as men to address underlying causes of coastal and marine biodiversity loss. Mainstream gender into coastal and marine biodiversity policies and programs, and coastal/marine biodiversity into national gender policy / programming as well as key sectoral policies, especially land, water, agriculture, fisheries.

- Build on women's primary roles in coastal resource and fisheries management, improve their access to coastal and marine resources and promote their equal voice in decision-making processes so as to incentivize more sustainable use of ecosystems and biodiversity.
- Engage women (as well as men) in coastal resource and fisheries management initiatives
- Ensure that alternative sustainable livelihoods work for women by taking account of their use of ecosystems
- Support women (as well as men) to further develop and apply their knowledge, capacities and voice in implementing biodiversity policies and programmes, including fostering women's leadership and scientific contributions.
- Alleviate the disproportionate burden for women by decreasing the time spent by women in performing certain tasks, such as collecting valuable resources including fuel, food and water, and increasing time for education and income generating activities.

CI-GEF response 09/22:

--This is content we will pursue at PPG. Additional detail was provided to this section to make it more clear what we will do in terms of activities.

--Activities were added, along with some information explaining how gender is relevant, but more work needs to be done during PPG phase.

Private Sector Engagement

Is the case made for private sector engagement consistent with the proposed approach?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/27/20 Cleared.

LK 10/26/20 No.

Please include this point in the PIF under the Stakeholder and Private sector sections.

LK 10/16/20

Please note that the private sector will be engaged in determining how to ensure the alternative livelihoods are *alternative* and not *additional* livelihoods.

Stakeholders need to switch out of unsustainable practices and the private sector stakeholders need to be engaged in figuring out how to do that.

JS 4/6/2020

This section is embryonic. Please refine the private sector analysis.

Agency Response

CI-GEF response 10/26:

Stakeholder and private sector sections updated

CI-GEF response 10/20:

Confirm that the private sector will be engaged in determining how to ensure alternative and not additional livelihoods.

CI-GEF response 09/22:

Private sector description has been expanded.

Risks to Achieving Project Objectives

Does the project/program consider potential major risks, including the consequences of climate change, that might prevent the project objectives from being achieved or may be resulting from project/program implementation, and propose measures that address these risks to be further developed during the project design?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/27/20 Cleared. Much more detail will be needed regarding how the project area has been affected by COVID19 and climate change and plans to address through the project.

LK 10/26/20 No.

The additional information on COVID19 below is interesting, but does not address the request. Please revise the PIF to consider how the project area has been (or the teams' best idea) affected by COVID (e.g. less or more fishing, more IUU fishing?). Below you mention reductions in tourism - has that affected the project area?

The climate change information in the ESSD is quite limited. Much more information will be expected for the CER/Pro Doc.

LK 10/16/20

The PIF discusses how the project process will be affected by COVID19, but not how the region and subsequently activities may be affected. Please discuss these aspects, including for example if there have been changes in fishing activities (e.g. increased fishing as people have lost other sources of income) and tourism activities. Also please consider how the financing may be affected, which is not addressed in the Financing subsection under the Risks section. The subsection notes there will be increased access to government funds once the Reserve is institutionalized, but does not consider if government priorities might have shifted due to COVID19.

The risks associated from escalated climate change impacts were found to be low-moderate and an assessment will be conducted during PPG. Please see STAP guidance on climate risk screening (link below) and provide at least a basic climate risk screening at PIF stage. At a minimum, at PIF stage, the climate risks should be identified, listed and described. This can include:

- a.) Outline of the key aspects of the climate change projections/scenarios at the project location (or as close to it with data available), which are relevant for the type of intervention being financed (e.g. changes in temperatures, rainfalls, increased flooding, sea level rise, saltwater acquirer contamination, increased soil erosion, etc).
- b.) Time horizon if feasible/data available (e.g. up to 2050). Please refer to list of examples from STAP guidance.
- c.) List of key potential hazards for the project that are related to the aspects of the climate scenarios listed above (describe how the climate scenarios identified above are likely to affect the project, during 2020-2050).
- d.) Plans for climate change risk assessment and mitigation measures during PPG.

(<https://stapgef.org/sites/default/files/publications/Climate%20Risk%20Screening%20web%20posting.pdf>)

JS 4/6/2020

As per GEF's updated Policy on Environmental and Social Safeguards (SD/PL/03), please provide in the PIF the overall project/ program risk classification. We note it is rated as C (minimal or no adverse environmental and social Impacts) in the attached screening report.

Please clarify why poaching by foreigners is specifically targeted here and not all IUU in general.

Please clarify the risk that the legislative act targeted by the projected is not adopted, the impact it would have on the project and provide some mitigation measures.

Agency Response

CI-GEF response 10/20:

The full impact of COVID-19 on the region is still largely unknown due to there being no clear end date to the crisis.

Fisheries/Aquaculture: In 2018, FAO estimated that 30.8 million people in Asia were engaged in the primary sector of marine and inland capture fisheries (FAO,2018). Millions more were involved in secondary activities, such as post-harvest processing and marketing, in which women predominate. The pandemic has directly impacted almost all of these people (FAO, 2020). According to the South East Asian Fisheries Development Center (2020), the rapid spread of the COVID-19 pandemic during the first quarter of 2020 not only in the region but also throughout the world, has impacted the region's fish production from marine capture and aquaculture. Fishing operations at sea encountered difficulties due to the national lock-down measures in many countries that prohibit fishers from going out to sea to fish. Meanwhile, fish farmers have also been limited to work outside of their homes to halt any further spread of the virus.

Tourism: South Asia is highly dependent on travel and tourism, especially as a generator of jobs (estimated at 47.7 million in 2019). In May 2020, the World Travel and Tourism Council predicted the crisis will result in at least a 42 percent drop in international tourist arrivals and a 25 percent drop in domestic tourism across SAR. Based on these assumptions, the region as a whole could lose 10.77 million jobs and US\$52.32 billion in GDP from the impact of COVID-19 (World Bank, 2020).

Financing: In terms of financing, overall government budgets have increased to emphasize on COVID-19 recovery. However, for the Department of Natural Resources, the proposed 2021 budget is consistent with 2020 numbers (2020: 25.495 billion pesos; 2021: 25.5 billion pesos).

Note that climate risk is included in the attached ESS documents.

CI-GEF response 09/20:

Overall risk classification added to the PIF

Text has been change to reflect IUU fishing in general but with focus on external poachers

This risk and information related to how to mitigate it was added

Coordination

Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined? Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/26/20 Cleared

LK 10/16/20

Please revise the diagram to include the various entities discussed in the text and ensure the font is big enough to read. For the Steering Committee, please consider including CSOs and private sector stakeholders or justify why they are not included.

JS 4/6/2020

Please provide in this section the institutional structure of the project (e.g. composition and mandate of steering committee, technical committee, etc.)

Please provide a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives.

Agency Response

CI-GEF response 10/20: The diagram has been updated to include the various entities discussed in the text. There is the possibility to include CSOs and private sector partners as part of Steering Committee. This will be further explored and documented as part of the PPG phase.

CI-GEF response 09/22:

Section 6: Coordination has been updated.

GEF financed projects for possible coordination has been added.

Consistency with National Priorities

Has the project/program cited alignment with any of the recipient country's national strategies and plans or reports and assessments under relevant conventions?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/16/20

Cleared

JS 4/6/2020

Please note that there is a typo on the climate SDG (it is SDG 13).

Please add projects contribution to the SDS-SEA IMPLEMENTATION PLAN 2018–2022.

Agency Response Typo is fixed and the project contributions to SFS-SEA implementation plan 2018-2022 has been added.

Knowledge Management

Is the proposed “knowledge management (KM) approach” in line with GEF requirements to foster learning and sharing from relevant projects/programs, initiatives and evaluations; and contribute to the project’s/program’s overall impact and sustainability?

Secretariat Comment at PIF/Work Program Inclusion

LK 10/26/20 Cleared.

LK 10/16/20

KM plans are explained in the KM section with respect to sharing lessons among project stakeholders and beyond. Please indicate how the project will learn from other projects. Please include KM in Component 4 in addition to M&E plans to ensure it is addressed in the project activities.

JS 4/6/2020

Please clarify why a program and a project levels are mentioned in this section ?

Please clarify the projects’ intentions with regards to learning from and sharing knowledge with other projects and other international initiatives and processes, such as under PEMSEA.

Agency Response

CI-GEF response 10/20:

KM has been included in component 4

The PRICELESS project will learn from existing initiatives (e.g. SMARTSeas project), specifically looking at lessons learned to design an effective and efficient steering committee. In addition, the project will learn from existing initiatives on how to best coordinate with government agencies.

CI-GEF response 09/22:

--this was removed as it does not belong in this section.

--See additions made re SDS-SEA implementation plan in the PIF.

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 PIF/Work Program Inclusion

LK 10/16/20

Cleared

Agency Response

Part III – Country Endorsements

Has the project/program been endorsed by the country's GEF Operational Focal Point and has the name and position been checked against the GEF data base?

Secretariat Comment at PIF/Work Program Inclusion

JS - 3/25/2020 -The LOE provided corresponds to another project. Please provide a valid LOE.

JS - 4/1/2020 - The total sum of the submitted project is 4,000\$ above that of the LOE (\$4,160,000 instead of \$4,156,000). Please provide a new LOE or revise the PIF so that the LOE and the PIF are consistent.

JS 4/6/2020 Thank you for the revisions. Cleared.

Agency Response

Termsheet, reflow table and agency capacity in NGI Projects

Does the project provide sufficient detail in Annex A (indicative termsheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table in Annex B to assess the project capacity of generating reflows? If not, please provide comments. After reading the questionnaire in Annex C, is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is the PIF/PFD recommended for technical clearance? Is the PPG (if requested) being recommended for clearance?

Secretariat Comment at PIF/Work Program Inclusion

JS - 3/25/2020 - Unfortunately the submission is not accompanied with a valid letter of endorsement and we cannot proceed with the the review at this stage, Please resubmit with a valid LOE.

JS - 4/1/2020 - Thank you for submitting a new LOE. However, the project's budget is not consistent with the LOE. Please revise the project's budget or provide a new LOE.

JS 4/6/2020 - Not at this stage. Please address comments above and resubmit.

LK 10/16/20 - Please address remaining comments.

LK 10/26/20 - Please address the few remaining comments.

LK 10/27/20 - Cleared.

ADDITIONAL COMMENTS

Additional recommendations to be considered by Agency at the time of CEO endorsement/approval.

Secretariat Comment at PIF/Work Program Inclusion

Review Dates

	PIF Review	Agency Response
First Review	3/25/2020	
Additional Review (as necessary)	4/1/2020	
Additional Review (as necessary)	4/8/2020	

PIF Review

Agency Response

Additional Review (as necessary)

10/16/2020

Additional Review (as necessary)

10/27/2020

PIF Recommendation to CEO

Brief reasoning for recommendations to CEO for PIF Approval

The *Philippine Rise Integrated Conservation for Enduring Legacies through Ecosystem Support Services (PRICELESS)* project is designed to conserve and better manage the Philippines Rise Marine Reserve (PRMR), which covers 352,390 hectares, including 49,684 hectares Strict Protection Zone and a 302,706 ha Multiple Use Zone. The project will protect the Reserve’s significant global biodiversity, facilitate the sustainable use of its marine resources, and generate livelihood benefits for adjacent communities.

As the first offshore MPA to complete the e-NIPAS (Expanded National Integrated Protected Area System) process, achieving increased legislative protection for the PRMR will represent a significant innovation. This will set an important precedent for MPA establishment, thereby expanding access to financial, technical and enforcement resources. Moreover, the marine ecosystems and biodiversity targeted by the Project are under-represented in the Philippines and the global MPA network, including seamounts, nutrient upwelling areas, and highly productive fisheries among other resources. The Protected Area Management Board (PAMB) will also offer an instructive model for formalizing co-management and ensuring that multiple interests are involved. Specific innovative features of the PAMB mandate include balancing competing agency agendas, and incorporating biodiversity and ecosystem management into shared priorities across those agencies.

Experience gained by all agencies and stakeholders involved in the PRICELESS project will generate numerous lessons learned to inform scale-up of offshore and onshore marine resource conservation efforts, as well as transboundary efforts (e.g. Biodiversity Beyond National Jurisdiction). In particular, mechanisms and strategies to coordinate enforcement over large areas and to engage the fishing sector are highly pertinent to marine conservation at scale elsewhere.

Financial and institutional sustainability of the PRICELESS project will be a direct result of declaration as an e-NIPAS protected area. With this status, the PAMB of the PRMRR will retain 75% of user fees to cover management costs (25% accrues to the government), and receive direct support for employee salary coverage from government. The PAMB will have the authority to raise funds through other forms of financing, and to collect fees from the public and from the private sector, including ecotourism, fishing, and mining, oil and gas exploration.