

Leveraging and Integrating Vital Ecosystems for Sustainable Blue Economy in Indonesia (LIVE-SEA)

Review PIF and Make a recommendation

Basic project information

GEF ID
12264
Countries
Indonesia
Project Name
Leveraging and Integrating Vital Ecosystems for Sustainable Blue Economy in
Indonesia (LIVE-SEA)
Agencies
IFAD
Date received by PM
1/7/2026
Review completed by PM

Program Manager
Hannah Fairbank
Focal Area
Biodiversity
Project Type
MSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

- a) Does the project meet the criteria for eligibility for GEF funding?
- b) Is the General Project Information table correctly populated?

Secretariat's Comments
HF 5/26/2026

Cleared.

HF 5/19/2026

1.) This comment has not yet been addressed. As requested, please select BD entry point 3 in the "indicative FA elements" table (see below, only 1-1 is selected).

2.) Cleared.

Indicative Focal Area Elements

Programming Directions	Trust Fund	GEF Project Financing(\$)	Co-financing(\$)
BD-1-1	GET	5,000,000.00	65,000,000.00
Total Project Cost (\$)		5,000,000.00	65,000,000.00

HF 4/23/2026

1.) Now aligned with BD focal area. Need to attribute to Objectives 1 and 3.

2.a) Given the "programming of funds" is now reflecting 100% BD focal area, please revise the "GEF Focal Area" box in the General Project Information table to read "Biodiversity", rather than "Multi Focal Area."

b.) Please redact AFLOU from the General Project Information table as this is no longer a CCM project.

RR (1/27/2026):

Project is not eligible as designed and needs restructuring. We noted some suggestions below on how to achieve this from various perspectives.

1. Please see further comments below for more details - this project would need significant revisions to be eligible under the CCM 1.4 objective on nature based solutions :

While restoration of mangroves and seagrass are among the priority areas of objective CCM 1.4 in the GEF-8 programming directions

(i) the PIF is missing a GHG target, which would be useful to include given expected impact of interventions

(ii) the hectare targeted is for now quite small, with less than a thousand ha restored, which means the GHG output is likely not to be cost-effective, which is a criteria for consideration under objective CCM 1.4.

Please see comments in project description on how to address (i) and (ii), including (a) verifying that the impact of the prospective joint co-financing loan is included in the core indicator calculation, (b) revising the hectare for more ambition in terms of investment (this is a 5M project almost exclusively TA), (c) there might also be some quantifiable benefits associated from the OECM establishment and coastal planning work.

(iii) there is already significant work being undertaken with GEF financing to pilot biodiversity positive blue carbon credit transactions both at pilot and at strategic level with the same executing partner (see comments below regarding baseline projects) which creates an issue of additionality (possibly this redundancy is due to this proposal being developed initially as a policy coherence window project with another one being selected on the same topic instead) - in addition, carbon credit transactions are not eligible under CCM focal area strategy. Given that proponents are also considering PES as an alternative financial instrument under component 3, would recommend to focus this proposal on this in the context of component 3 (this is with the understanding that this would not be carbon credit based PES mechanisms, otherwise the same comment applies here and the entire proposal would need reconsideration).

2. To be eligible for GEF biodiversity focal area financing

(i) the project must be designed to result in the conservation and sustainable use of globally significant biodiversity. Please see the GEF-8 Programming Directions Biodiversity Focal Area strategy for further information about establishing/identifying ?global significance?. Local or national-level significance and/or ecosystem services are not sufficient to address this standard. Please include this as the top criteria for site selection and revise sites accordingly. For proposed project sites please include evidence of the global biodiversity significance of target biodiversity/ecosystems.

(ii) the project also needs a TOC that is focused on actively addressing drivers/reducing threats to biodiverse ecosystems in target (OECM) geographies (BD-1), in concert with resource mobilization and sustainable finance options (BD-3).

(iii) Similarly as noted above for CCM, component 2/3 would need to be revisited. Funds would need to be spent on BD conservation and resource mobilization for BD. This could focus on the restoration of biodiversity and stewardship of highly biodiverse marine ecosystems, but given additionality issues the same comment applies on biodiversity positive carbon credits - forms of PES consistent with the above comment that are not based on carbon credits could be considered.

Agency's Comments

22/05/26

BD 3.1 is now reflected in the programming tables.

1) Objective 1 is included. We added **Objective 3 ? Increase mobilization of domestic resources for biodiversity:**

The Project will support sustainable financing mechanisms under Component 3 by integrating biodiversity performance standards into fisheries, aquaculture, and marine tourism value chains, attracting sustainable investment solutions, and establishing benefit-sharing mechanisms with communities to incentivize sustainable ecosystem management.

2a.) Addressed.

2b.) Addressed.

1. The PIF was restructured to be fully eligible as a biodiversity focal area project. This project now targets BD-1 and is focused on conserving and restoring globally significant coastal and marine biodiversity through Other Effective Area-Based Conservation Measures (OECMs) management and biodiversity-aligned with Community Biodiversity and sustainable finance (non-carbon).

(i)GHG target. Clarified. GHG targets will not be added because the project is framed and reported under the biodiversity focal area, not CCM. Rationale: A mitigation core-indicator target is only required if the project is positioned for CCM objectives; this PIF will instead target CI3/CI5/CI11 for biodiversity outcomes.

(ii) Hectarage target. Agreed. The target area has been reconsidered and the pilot sites now cover a wider area through 1) Bintan, 2) Manggarai Barat and 3) Donggala, covering 74,000 ha of OECMs (CI-5) and restoration at <1,000 ha. However, the co-financed investment through IFAD-financed Blue Coast will drive significantly larger biodiversity outcomes, under CI3/CI5, bringing the total area of seascapes under improved management to 414,439 ha (CI 5).

(iii) Carbon credit transactions. Agreed. All carbon-credit transaction language has been removed. Component 3 was redesigned to support non-carbon biodiversity finance/ PES.

2. GEF biodiversity eligibility

(i) Conservation and sustainable use of globally significant biodiversity.

Agreed. Under Context and global environmental significance, ?global significance? profile is strengthened. Biodiversity focal area eligibility hinges on global significance (not only national ecosystem services). In addition, site selection has prioritised by global biodiversity significance, including endangered, threatened and protected species (e.g. dugong and other megafauna) i.e. The scale of loss of mangrove and seagrass habitats in Indonesia matters globally, as it jeopardizes global climate goals, as well as undermining fisheries, biodiversity, and coastal resilience, and then by threat intensity and feasibility of threat reduction, aligned with the National Biodiversity Strategy and Action Plan (NBSAP) target.

(ii) ToC. Agreed. The ToC now focuses on activities that address drivers and reduce threats to biodiverse ecosystems through enabling the effective and equitable management of OECMs (Pathway 1), nature positive livelihood transitions and strengthening local community stewardship to secure the long-term protection and enhancement of biodiversity within OECMs (Pathway 2), and sustainable financing for biodiversity (Pathway 3).

(iii) Component 2/3. Addressed. All carbon-credit transaction language has been removed. Component 3 was redesigned to support non-carbon biodiversity finance/ PES. Restoration of biodiversity and stewardship through Component 2 will be linked with non-carbon biodiversity finance/ PES.

2. Project Summary

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

Secretariat's Comments
HF 5/26/2026

Cleared.

HF 5/19/2026:

Please only include aggregate core indicator targets in the project Summary. The aggregate are the targets that will be achieved with GEFTF and co-finance combined, per GEF policy/results architecture specifies. The summary currently separates out targets by GEF and co-finance.

HF 4/23/2026:

Cleared.

RR (1/27/2026):

While the summary is twice longer than the expected length with 500 words, it is relatively clear.

1. Could you please reformat the summary for ease of flow, with first a paragraph on the global significance and environmental problem (first sentences up to "socio-economic and climate resilience"), then describe project objective and approach in a second paragraph (up to "Blue Coast activities"). Then the third describing causal pathways and associated benefits to finish.
2. Could you please include at the end a reference to all core indicators targeted, not just beneficiaries (including BD and GHG related benefits)
3. Please ensure at the end of the review process to reflect any change made to project design in the summary.

Agency's Comments

Addressed. The summary now mentions aggregated core indicator targets.

The Project Summary has been revised: First paragraph states global biodiversity significance and threats in the target seascapes. Second paragraph states the LIVE-SEA objective. Third paragraph states the approach, and BD focused CI targets.

3 Indicative Project Overview

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

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

Secretariat's Comments
HF 5/26/2026

Cleared.

HF 5/19/2026

a.) The objective of this project visa vis biodiversity (conservation, restoration or sustainable use) is still unclear. Please revise for clarity. Note that customarily the means to achieve the project objective shouldn't be included in the language objective itself (e.g. "through X, Y, Z action). Suggestion further revision to clarify: "To enable the effective and equitable scaling of marine OECMs for the conservation of biodiversity and achievement of GBF target 3." Less clean but clearer: "To enable the effective and equitable scaling of marine OECMs for the conservation of biodiversity while improving ecosystem integrity and sustainable livelihoods."

b.) Cleared

HF 4/23/2026:

a.) Suggest further simplification of project objective to highlight biodiversity dimension.

b.) Although generally the components and project outcomes are sound, it isn't entirely clear from the Indicative Project Overview why the project Components are organized how they are. For instance: Component 2 is livelihoods and MRV; while Component 2 is Sustainable finance; and Component 4 is capacity to achieve Components 1 to 3 plus scaling and KM. Further, the sound governance and management of the OECMs seems to get entirely lost in how these components and project outcomes are arranged. Suggest rethinking the Component/Outcome structure and clarifying to have a coherent theme/focus for each Component-maybe return to the TOC for some direction on this? For instance Component 2 is really about engaging communities to drive conservation and sustainable development, right? If so this could be the unifying theme for the component. Suggest mainstreaming capacity building by taking it out of Component 3 and embedding it within the other components as a means to an end for achieving project outcomes. Please revise.

RR (1/27/2026):

Please see comments in theory of change and core indicator sections regarding soundness and eligibility of logical framework.

1. It would be useful to de-jargonize and simplify the project objective and ensure it is in line with revised scope and theory of change consistent with the BD/CCM focal area strategies after design revisions.

Agency's Comments

22/5/2026

The second suggestion is applied as the objective: "To enable the effective and equitable scaling of marine OECMs for the conservation of biodiversity while improving ecosystem integrity and sustainable livelihoods".

18/05/2026

a) The project objective has been revised as follows to highlight the biodiversity dimension:

To enable the effective and equitable scaling of marine OECMs in Indonesia, through biodiversity-linked financing, improving ecosystem integrity supporting sustainable livelihood transitions, and advancing GBF Target 3-

Capacity building is now incorporated under each of the first three components, and Component 4 includes knowledge management and translation of the lessons learned into policy for replication and scalability of the OECM model.

Agreed. The objective is simplified in line with the revised scope the BD focal area

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

Secretariat's Comments

HF 4/23/2026:

Clear

RR (1/27/2026):

1. Please clarify how gender equality and women's empowerment aspects are reflected in the design of outcomes 1,2 and 3. This can be further detailed during PPG as needed.

Agency's CommentsAgreed. This will be further detailed during the PPG stage. A Gender Action Plan will be prepared during the PPG phase to ensure the project embeds gender sensitivities throughout. A gender sensitive lens will be applied to the management planning process under Component 1, including among others participatory mapping, FPIC validations, preparation of co-management plan, governance frameworks. The same will apply under Component 2 for the citizen science monitoring programme design and nature positive livelihood enterprises to be support. Gender sensitivities will also be reflected in Component 3

3.3 a) Are the components adequately funded?

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

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

Secretariat's Comments

HF 4/23/2026:

Cleared

RR (1/27/2026):

PMC at 5% and contributions proportional

1. Component 2 and 3 are labelled as investments but contain technical assistance work - could you please clarify the budget dedicated to the specific investment outputs (2.2, 3.2)?

Agency's Comments

Agreed. Budget will be split as follows: (a) TA (planning, training, governance) and (b) investment (restoration works, monitoring equipment, enforcement/management assets, finance mechanism capitalisation where eligible).

The budget dedicated for investment outputs under Component 2 is:

? 2.1.1 Community-based monitoring systems for tracking and reporting biodiversity designed for in pilot OECMs.

? 2.1.2 Nature positive livelihood programmes initiated supporting in pilot OECMs

? 2.1.3 Biodiversity monitoring platform established for tracking and reporting.

Component 3 is:

? Biodiversity performance standards integrated into fisheries, aquaculture, and marine tourism value chains.

? Benefit-sharing mechanisms tested ensuring equitable distribution of revenues to IPLCs.

The detailed costing allocated for each activity either from TA or investment will be clarified during the PPG stage.

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

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

b) Are the key barriers and enablers identified?

Secretariat's Comments

HF 5/26/2026

Cleared.

HF 5/19/2026

1.) Annex C of PIF noted. In the description of the project sites, please include a description of their global biodiversity significance. Currently the significance of the East Nusa Tenggara site has been included (e.g. presence of an Important Marine Mammal Area (IMMA)) but for the other two sites, please address/describe global biodiversity significance.

Please note that the presence of some threatened species is not sufficient to qualify for BD of global significance. It typically requires justifying the project's contribution to the persistence of biodiversity components- genes, species, or ecosystems - in relation to their worldwide extent or population size. Proponents are invited to use the Key Biodiversity Area (KBA) standard or other criteria commonly used to identify areas for biodiversity conservation, but other well justified criteria will be accepted with consideration for the specific project context and data availability. Please provide evidence that either the areas are recorded as KBA (or other such designations e.g. Ramsar sites etc) or that the targeted sites meet IBA/KBA criteria and, as relevant, include the related KBA assessment/registration process as part of the GEF interventions.

HF 4/23/2026:

1.) Appendix C cannot be located. Please include as an annex in documents tab.

In addition, please ensure that the file names for each document included in the documents tab are clear and descriptive so reviewers can easily discern what each document is from a quick scan of the file name.

RR (1/27/2026):

Barriers are well identified.

1. While the national level environmental problem and drivers of degradation are described in details, this is not the case for the three pilot sites targeted by this project. Could you please include a landscape description of these 3 sites outlining the global significance of their biodiversity and the drivers of degradation?

Agency's Comments

22/05/26

Addressed. The description is expanded including the below key elements:

Donggala: Donggala's Pasoso Island and surrounding marine ecosystems globally significant, part of the Wallacea biodiversity hotspot, supporting internationally recognized KBA and IBA values.

Bintan: globally significant biodiversity values and are increasingly recognized under marine conservation and KBA-related frameworks; extensive seagrass ecosystems that serve as critical feeding habitats for the vulnerable dugong (*Dugong dugon*), green turtles (*Chelonia mydas*), and nursery grounds for commercially and ecologically important fish species.

18/05/26

Appendix C is included.

Addressed. A landscape description of the 3 sites is provided under the section of overview of target seascapes, and further details are provided in Appendix C.

4.2 JUSTIFICATION FOR PROJECT

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

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

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

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

Secretariat's Comments

HF 5/19/2026

Cleared

HF 4/23/2026:

1.) There are several other GEF-8 projects (both GEFTF and GBFF) in process focused on OECM policy, finance, management as well as MPA sustainable finance. Please provide sense of how this project fits into the broader portfolio and will work with these other projects. Initial level of detail is requested at PIF with further engagement during PPG and info at CER.

2-3.) Cleared.

RR (1/27/2026)

1. The rationale includes a list of initiatives and investments, but it would be useful if the agency could double check recent approvals of GEF projects on this topic in Indonesia to avoid overlap. Project 12073 - Enhancing Policy Coherence for a Sustainable Blue Economy in Indonesia (UNEP - Ministry of Marine Affairs and Fisheries) addresses a very similar scope of work as the present proposal, and with the same executing partner. It would be useful to look at the project PIF and draw on it for an updated mapping of relevant initiatives (including said project) and clarify the value added of another investment on this topic.

2. The objective and project approach are described too early in the rationale which is confusing as the justification arrives after. Please move the section on project objective and approach (from "the project objective is(...)" to "(...) high priority ?Blue Economy? geographies") to the very end of the project rationale (e.g. after describing the baseline initiatives and the stakeholder/sectoral mapping).

The part describing further justification of the objective should be split as part of it corresponds to the sectoral analysis (baseline) while another part describes the project approach.

- from "Indonesia has made significant progress in strategically linking biodiversity conservation(...)" to "to that of a conventional protected area." could be kept ahead of the baseline initiative and stakeholder mapping (or merged into the "baseline" section)

- from "In this context, the LIVE-SEA project will demonstrate (...)" to " Indigenous Peoples and Local Communities (IPLCs) and youth" can go after the formulation of the project objective.

3. Please see comments above about blue carbon credits - the baseline is already quite saturated on this topic with multiple ongoing GEF projects. Given that the project also includes an option to explore PES, would suggest to reframe the design to focus on this explicitly - the rationale can therefore be revised accordingly.

Agency's Comments

18/05/2026

Noted and addressed.

Within the broader GEF-8 and Global Biodiversity Framework Fund (GBFF) portfolio in Indonesia, LIVE-SEA fills a distinct implementation gap by operationalising community-led marine OECMs at the seascape level through integrated governance, participatory biodiversity monitoring and MRV, nature-positive livelihoods, and biodiversity-linked financing mechanisms. While other initiatives focus primarily on national policy frameworks, formally designated marine protected areas (MPAs), species conservation, ocean accounting, or large-scale financing structures, LIVE-SEA focuses specifically on the governance,

operationalisation, and financing of biodiversity-focused marine OECMs within locally managed seascapes.

Please see more details in the updated PIF.

1. **Avoid overlap with existing projects: Agreed.** Under the section of Coordination and Cooperation with Ongoing Initiatives and Project, it is explained that LIVE-SEA focuses on enabling site-level OECM operationalisation (co-management, monitoring, compliance, restoration, nature positive livelihoods, stewardship, and biodiversity finance pilots) in three seascapes, while project 12073 focuses on national policy/data/accounting coherence within formally declared MPAs not OECMs; the activities will be sequenced, complimentary, additional and non-duplicative.

2. Agreed and edited.

3. The activities around blue carbon credits are removed, and replaced with results-based / performance based / biodiversity focused financing/ PES.

5 B. Project Description

5.1 THEORY OF CHANGE

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

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

Secretariat's Comments
HF 5/26/2026

Cleared.

HF 5/19/2026

A.i.) & ii) Please upload a higher resolution TOC graphic. The current TOC graphic is blurry to the point of being illegible. If needed, redact the graphic from the PIF and include as an uploaded document in the documents tab.

iii.) Assumptions: These will need to be further developed during PPG to clearly articulate what causality is assumed/hypothesis about cause and effect between actions and what results are expected from those actions-this underpins the entire project design.

HF 4/23/2026:

A. i.) After a close review of the TOC and all the Components, it is unclear how this project will address/will support communities and other stakeholders to address identified threats to biodiversity in the project sites. Furthermore, support to the management and governance of OECMs is also absent. Please revise the TOC and project Components.

ii) Please make any other needed revisions to the TOC based on previous comments above regarding the logic of the Components and project Outcome structure/organization.

iii.) "Assumptions" that are listed under each causal pathway are more contextual factors (e.g. the government will stay stable) versus hypothesis regarding causality. Those are fine to include, but the assumptions that we are looking for in a TOC causal pathways are the assumptions/hypothesis (that are often hidden...) that links proposed action/activity to intended result. Include the hypothesized/assumed causal links between activities/outputs and outcomes so that these are specified and testable.

b.) Component 1: Output 1.1.3 assuming this is linked to livelihood development in Component 2? If so please cross-reference/demonstrate links.

Components 2 & 3: Please see STAP guidance on PES and essential elements to guide GEF engagement and support in PES (pages 5-11) and align project design/components/outcomes accordingly, now and throughout PPG: <https://www.stapgef.org/resources/report/payments-environmental-services-and-global-environment-facility>

RR (1/27/2026)

1. Please see comments made in section 1 above about project eligibility and ensure project theory of change is adjusted accordingly to land on a scope that (i) is consistent with CCM and BD focal area strategies, (ii) removes redundancies with baseline investments and brings additionality.

Agency's Comments

22/05/2026:

- A. i) and ii) a higher resolution TOC graphic was uploaded.
- B. Noted. The assumptions will be thoroughly reviewed during PPG.

18/05/26

Ai) The revised ToC has been revised to address this and previous comments:

- The project will reduce key pressures on marine biodiversity including overfishing, destructive fishing practices, habitat degradation, unmanaged coastal development, and unsustainable resource extraction, through biodiversity-based zoning, participatory management, and strengthened governance.
- Nature-positive livelihood transitions and community stewardship mechanisms will reduce dependency on unsustainable marine resource use and strengthen incentives for long-term biodiversity conservation.
- Support to the management and governance of OECMs is also addressed. The revised Component 1 includes support for participatory planning, biodiversity zoning, OECM management plans, the establishment of governance bodies, adaptive management, spatial planning integration, institutional coordination, compliance and management systems.

At the national and sub national levels, the Ministry of Marine Affairs and Fisheries (MMAF) will coordinate activities to ensure that community managed Other Effective Area Based Conservation Measures (OECMs) in Indonesia are formally recognized and integrated into

marine spatial planning processes (RZWP3K). This formal recognition strengthens governance by embedding Indigenous Peoples and Local Communities (IPLCs) into decision making structures, thereby safeguarding globally significant biodiversity. The project will institutionalize community led OECMs, ensuring they are not only acknowledged but also effectively governed within Indonesia's marine policy framework.

To reinforce sustainability and replication, the project will deliver capacity building programs under Component 1,2 and 3. The lessons learned will be captured through Component 4, translated into knowledge products to inform national level policies. Furthermore, a replication toolkit will be developed to scale community led management of OECMs, biodiversity finance-enabled OECMs nationally, creating pathways for scaling and benefit sharing and long term financing. Together, these measures align with GEF safeguards and governance priorities, ensuring that Indonesia's OECMs contribute to both biodiversity conservation and inclusive community development.

i) ToC and the outcome structure has been revised based on previous comments.

iii) Noted. Assumptions have been revised

b) Component 3 Outcome has been changed to "Performance-based biodiversity financing mechanisms operationalized with credible MRV, conditionality, equitable benefit-sharing, and safeguards to ensure additional and sustained conservation outcomes". STAP guidance on PES has been integrated.

Agreed and addressed. The project is now focussed on BD-1.

5.2 INCREMENTAL/ADDITIONAL COST REASONING

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

Secretariat's Comments

HF 5/19/2026

Cleared

HF 04/23/2026

Please see previous question regarding ongoing/in preparation projects.

RR (1/27/2026):

1. At this stage the project is redundant with several ongoing baseline investments and initiatives and the additionality is insufficient. Thank you for revising the project to ensure additionality (please see comments above and below on this).

Agency's Comments

18/05/26

Addressed as above #4.3.

The PIF is revised.

5.3 IMPLEMENTATION FRAMEWORK

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

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

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

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

Secretariat's Comments

HF 5/19/2026

Cleared

RR (1/27/2026):

1. Could you please revise the situation analysis and corresponding project scope and implementation framework to ensure complementarity and avoid overlap with other GEF-8 projects that are working on OECMs (and/or blue economy) in Indonesia. There are several. Please work with the OFP to ensure that this project is strategic in the context of the current GEF-OECM portfolio in Indonesia.

2. Further, the section on 'Cooperation with ongoing initiatives' is empty - please amend as relevant.

Agency's Comments

Agreed and revised.

1. The situation analysis and project scope and implementation framework has been edit to ensure complementarity and to avoid overlap with other GEF-8 projects working on OECMs, and clarification from the government is included.
2. The section on Coordination and Cooperation with Ongoing Initiatives has been amended and will be further revised during the PPG.

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

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

Secretariat's Comments

HF 5/26/2026

1.) According to the previous review sheet response we understood that the total area of impact for this project (GEF + co-finance) is **414,439 hectares**. Therefore, please update the core indicator targets accordingly. They still read 74,000ha which is a really different return on investment ratio for a \$70 million investment (e.g. \$5 m GEF + \$65 m co-finance): "The CI-5 target is now 74,000 ha for the three pilot sites included in the project (Bintan, Magarrat and Donggala. The co-financed investment through IFAD-financed Blue Coast will drive

significantly larger biodiversity outcomes, bringing the potential total area of seascapes under improved management to 414,439 ha (CI 5)."

HF 5/19/2026

1.) The Core Indicator table in the PIF and related text have not been updated with the aggregate figures. Core Indicator target 5 is still 74,000 hectares. Please revise the table and the related text under it with aggregate targets, and anywhere else the targets arise in the PIF and related documentation.

2.) Cleared.

HF 04/23/2026

1.) Please note that the GEF-8 core indicator results architecture/guidelines specifies that the core indicator targets should be inclusive of those achieved by co-finance as long as those activities/results are aligned with GEF results management/monitoring architecture. Therefore please revise accordingly.

2.) Please review/revise core indicator targets-per GEF-8 indicator definitions/results architecture-given previous comment/question regarding project TOC, components and outcomes and the extent to which what is planned will tangibly improve the management and abate threats to these marine OECMs.

RR (1/27/2026):

1. Core Indicator Targets should be revised as site selection is revised. The current hectareage targets are quite low for a \$70 million investment (GEFTF \$5 m; co-finance \$65 mil), please ensure the ambition and return on investment/cost effectiveness of this project is increased.

Agency's Comments

28/05/2026

Apologies for confusion, the actual total area of impact is 174,000 ha - this includes the 74,000 breakdown in the 3 pilot sites, plus 100,000 ha targeted by the wider investment program. The text has been revised to reflect this explanation.

22/05/2026

Updated with the aggregate figures.

18/05/26

1) The core indicator results have been updated for the activities including those to be achieved by co-financiers, aligned with GEF results.

2) The ToC and component descriptions have been updated. Improved zoning plans, strengthened community stewardship, nature-positive livelihood transitions, and sustainable financial flows from innovative financing mechanisms will enhance management effectiveness and help abate threats to these marine OECMs.

Agreed and revised.

The CI-5 target is now 74,000 ha for the three pilot sites included in the project (Bintan, Magarrat and Donggala. The co-financed investment through IFAD-financed Blue Coast will

drive significantly larger biodiversity outcomes, bringing the potential total area of seascapes under improved management to 414,439 ha (CI 5).

Final spatial targets for CIs will be revisited and revised during PPG based on confirmed co-financed intervention areas and management actions; revised targets will be attached as GIS-based calculations consistent with the GEF core indicator guidance.

Indonesia has a national register of OECMs (<https://sidako.kkp.go.id/sidako/oecm>).

During the PPG, once the OECM areas are confirmed, the name, size and identification of the OECMs to be supported will be indicated and the OECM pilot sites registered on the WDPA-OECM database at the earliest possible opportunity, as per the Biodiversity Focal Area guidance.

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

Secretariat's CommentsN/A

Agency's Comments

5.6 RISKS

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

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

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

Secretariat's Comments

HF 04/23/2026

Cleared. Please further address during PPG and at CER.

RR (1/27/2026):

1. Institutional and Policy risks seem underappreciated, given the clear redundancy of this project with several GEF-funded initiatives with the same executing partner. Could you please elaborate on this risk and expand on related mitigation measures?

Agency's Comments

Agreed. Mitigation measures improved including:

The communication and coordination with relevant ministries have been completed and clarified with the Ministry of Marine Affairs and Fisheries (MMAF), Bappenas, and the respective local governments at the three proposed locations. These engagements confirmed institutional alignment, clarified roles and responsibilities, and ensured that the proposed activities are consistent with national priorities and local development plans. OFP-endorsed

coordination plan, signed activity boundaries with related GEF projects, and annual independent check that deliverables remain non-duplicative (reported in PIR).

5.7 Qualitative assessment

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

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

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

Secretariat's Comments

HF 5/19/2026

Cleared

HF 04/23/2026

Please address comments on TOC and components.

RR (1/27/2026):

Please see comments above in project rationale and description

Agency's Comments

18/05/2026

Addressed. Please see #5.1

Yes - revised and updated in sections on:

? Policy Coherence,

? Transformative

? Innovative

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

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

Secretariat's Comments

HF 05/26/2026

Cleared.

HF 5/19/2026

Not yet fixed. See previous related comment. Indicative FA entry point needs to also include BD 3.

HF 04/23/2026

Given the significant focus of this project on sustainable financing for BD conservation, please select **Objective 3 of the BD strategy as well as Objective 1**. Ensure that this change is made throughout the document.

RR (1/27/2026):

1. Please remove reference to alignment with the GEF-8 STAR Competitive Window. This is a focal area project so in this case it would not be relevant to clarify alignment with other windows. This being said, we appreciate addressing redundancy with the just approved competitive window project for Indonesia.

2. Could you please see above comments on alignment with BD and CCM focal area strategies and reflect the outcome of the revisions in this section as well.

Agency's Comments

22/05/2026. Now addressed

18/05/2026

Agreed and updated.

Agreed and revised.

1. We have deleted STAR competitive window alignment language.

The project has been aligned with the biodiversity focal area and not CCM.

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

Secretariat's Comments

HF 04/23/2026

Cleared

RR (1/27/2026):

1. Project alignment/coherence with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors) is missing under this section. Thank you for including a justification text.

Agency's Comments

Agreed and revised.

See section C. Alignment with GEF-8 Programming strategies and country/regional priorities
6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat's Comments
HF 04/23/2026

Cleared.

RR (1/27/2026)

Please ensure to update based on any revisions to project design.

Agency's Comments Yes.

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments
HF 04/23/2026

Cleared

RR (1/27/2026)

See below

Agency's Comments

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

Secretariat's Comments
HF 04/23/2026

Cleared.

RR (1/27/2026)

1. A list of stakeholders consulted during PIF development, including dates of these consultations, is not provided. the Agency prodoc includes information on some of the stakeholders consulted, but this is not reflected in the portal view version - in addition, it does not include dates of these consultations. Could you please revise?

2. Could you please also include a summary of the finding of these consultations and plans to engage and consult these stakeholders in project development, including civil society organizations, indigenous peoples and local communities?

Agency's Comments
Agreed and updated

1. The list of stakeholders has been mapped, and detailed engagement plans will be further developed during the PPG phase.

2. A table showing the consultations held and a summary of findings is included in the PIF.
8 Annexes

Annex A: Financing Tables

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

STAR allocation?

Secretariat's Comments
Cleared

RR (1/27/2026)

Yes

Agency's Comments
Focal Area allocation?

Secretariat's Comments
Cleared

RR (1/27/2026)

Yes

Agency's Comments
LDCF under the principle of equitable access?

Secretariat's CommentsN/A

Agency's Comments
SCCF A (SIDS)?

Secretariat's CommentsN/A

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

Secretariat's CommentsN/A

Agency's Comments
Focal Area Set Aside?

Secretariat's CommentsN/A

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

Secretariat's Comments
Cleared

RR (1/27/2026)

Yes - 150k

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

Secretariat's Comments
HF 04/23/2026

Cleared

RR (1/27/2026)

1. Could you please clarify what the co-financing as investment mobilized corresponds to (both the IFAD and MMAF ones)? For IFAD, it is noted that the loan amount is 100M but the reported amount is 60M\$ - does this correspond to a portion of the loan that will be coordinated with the GEF grant? For the MMAF financing, what investments would this correspond to?

Agency's CommentsClarified. Of the IFAD sovereign financing envelope, US\$60m represents the portion geographically and programmatically aligned with LIVE-SEA pilot seascapes and outputs; MMAF co-finance (US\$5m) supports enforcement/monitoring and restoration-related investments in the same sites

Annex B: Endorsements

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

Secretariat's Comments
Cleared

RR (1/27/2026)

Yes

Agency's Comments

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

Secretariat's Comments-

Agency's Comments

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

Secretariat's Comments-

Agency's Comments

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

Secretariat's CommentsN/A

Agency's Comments

Annex C: Project Location

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

Secretariat's Comments

Cleared

RR (1/27/2026)

Yes

Agency's Comments

Annex D: Safeguards Screen and Rating

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

Secretariat's Comments

HF 5/19/2026

Cleared

HF 04/23/2026

1. & 2.) Cleared.

3.) Noting that the following Safeguards/FPIC provisions are included/budgeted for in the project components: Output 4.1.2 ? Safeguards frameworks implemented: Environmental and social safeguards?including FPIC procedures, grievance mechanisms, and benefit-sharing arrangements?will be established to ensure equitable and responsible implementation.

RR (1/27/2026)

Yes - moderate risk, consistent with risk table

1. Could you please confirm whether Indigenous Peoples are considered among the Key stakeholders in table 1: Key stakeholders and their roles? (page 19)? And if so, how they would be engaged in project governance?

2. In relation with comments above about stakeholder engagement, could you please clarify whether vulnerable populations including small scale fishermen and women and Indigenous Peoples were consulted during development of the project concept (PIF) and if so how results of such consultations were integrated into the project concept (PIF)?

Agency's Comments

1. Yes. Under Component 1, IPLCs will be directly engaged in the OECMs management planning process, through the baseline assessment surveys, participatory mapping, to inform boundary and biodiversity zoning plan preparation and co-management design. The project will use Free, Prior and Informed Consent (FPIC) processes, to support the recognition of community-led marine OECMs.
2. Yes. Please see the stakeholder consultation table, which includes a high level summary of the meetings held and the key outcomes.

The aforementioned matters are also further addressed under Component 4, output 4.1.2 Safeguards frameworks implemented including FPIC, grievance mechanisms, and benefit-sharing arrangements.

Through the Social, Environmental, and Climate Assessment Procedure (SECAP), we identified that Free, Prior and Informed Consent (FPIC) and Grievance Redress Mechanisms (GRM) are integrated across all project components. This is particularly emphasized under Outcome 1.1, where Marine Other Effective Area-Based Conservation Measures (OECMs) are recognized and effectively governed by Indigenous Peoples and Local Communities (IPLCs), ensuring the protection of globally significant biodiversity. Additionally, under Output 4.1.2, safeguards are implemented, including FPIC, grievance mechanisms, and benefit-sharing arrangements, in line with GEF requirements.

Annex E: Rio Markers

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

Secretariat's Comments

HF 5/19/2026

Cleared

HF 04/23/2026

Unclear how CCM and CCA are significant objectives of this project. If they are, suggest articulating how this is the case in the project description. If not, please redact and retain biodiversity.

RR (1/27/2026)

1. Rio Marker of 1 is selected for CCA, but the project logical framework does not reflect adaptation as a significant objective with supporting evidence. Could you please clarify throughout project design what specific climate related risks are considered by this project and how project interventions are designed to enhance adaptive capacities of vulnerable communities and ecosystems to identified risks.

Agency's Comments

18/05/2026

CCM and CCA have been redacted.

We propose corrective action: retain CCA marker 1 as a co-benefit only if the PIF explicitly states climate risks and adaptation co-benefit pathways; otherwise downgrade to 0.

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's CommentsN/A

Agency's Comments

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to

assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's CommentsN/A

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments

HF 6/8/2026

Cleared. Please see issues to address during PPG. This is a GEF-8 2-step MSP that must be approved prior to **June 17, 2026**.

HF 5/26/2026

Please address remaining comment regarding core indicator targets in review sheet and resubmit as soon as possible.

Note that there is significant time pressure to conclude this review given the impending end of GEF-8. All MSPs must be GEF CEO approved (having gained technical and policy clearance) **no later than June 17th, 2026**. Please note that there will be a GEFSEC project review/approval blackout period during the GEF Constituency, Council and Assembly May 29-June 8th.

HF 5/19/2026

Please address remaining comments in review sheet and resubmit as soon as possible.

Note that there is significant time pressure to conclude this review given the impending end of GEF-8. All MSPs must be GEF CEO approved (having gained technical and policy clearance) **no later than June 17th, 2026**. Please note that there will be a GEFSEC project review/approval blackout period during the GEF Constituency, Council and Assembly May 29-June 8th.

HF 04/23/26

Please address comments in review sheet and resubmit as soon as possible.

Note that there is significant time pressure to conclude this review given the impending end of GEF-8. All MSPs must be GEF CEO approved (having gained technical and policy clearance) **no later than June 17th, 2026**. Please note that we expect there will be a GEFSEC project review/approval blackout period during the GEF Constituency, Council and Assembly May 30-June 6th.

RR (1/27/2026)

Thank you for considering comments and resubmitting. Thank you for highlighting changes made to the PIF for ease of tracking for the rest of the review.

Agency's Comments18/05/2026

Noted.

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

Secretariat's Comments

1. During PPG, in the development of the Gender Action Plan, please ensure that the findings from the gender analysis informs the preparation of the GAP and that these are reflected in the project components, including in Outcomes 1, 2 and 3. Please ensure that in the development of the results framework, gender-specific indicators are included to facilitate monitoring and reporting. Please indicate measures to facilitate and support the implementation of the GAP (e.g., budgets, regular monitoring, adaptive management, etc.). Please make a reference to include in PIRs, MTRs and TE, reports on gender-specific results, including the implementation of the Gender Action Plan.

2. If GHG emission reductions are expected via the restoration or conservation work please calculate and submit at CER.

3. Further developed during PPG to clearly articulate what causality is assumed/hypothesis about cause and effect between actions and what results are expected from those actions-this underpins the entire project design.

4. The detailed costing allocated for each activity either from TA or investment will be clarified during the PPG stage.

5.) Core Indicator 3 includes the OECMs and hectarage which totals 74,000 hectares but the total target is 100,000 hectares more than that total. During PPG please further refine Core Indicator Targets and do not separate out the hectares with GEF finance vs co-finance. Please include total and target geographies.

6. Register OECMs in the WCPA database.

7. Ensure alignment of any PES activities with STAP guidance on the matter: <https://www.stapgef.org/resources/report/payments-environmental-services-and-global-environment-facility>

Agency's CommentsWell noted.

Review Dates

	PIF Review	Agency Response
First Review	1/27/2026	3/12/2026
Additional Review (as necessary)	4/23/2026	5/18/2026
Additional Review (as necessary)	5/19/2026	5/22/2026
Additional Review (as necessary)	5/26/2026	

	PIF Review	Agency Response
Additional Review (as necessary)	6/8/2026	