

Accelerating Community-Led Actions for Ecosystem Resilience and Biodiversity Conservation Through Integrated Landscape Management (ACT)

Review PIF and Make a recommendation

Basic project information

GEF ID	12066
Countries	India
Project Name	Accelerating Community-Led Actions for Ecosystem Resilience and Biodiversity Conservation Through Integrated Landscape Management (ACT)
Agencies	IUCN, UNDP
Date received by PM	9/17/2025
Review completed by PM	10/31/2025
Program Manager	Ulrich Apel
Focal Area	Multi Focal Area
Project Type	FSP

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

10/01/2025: Not fully.

1) The PIF is not correctly aligned with focal area objectives and inconsistently designed in several areas such as: Programming of funds (i.e. indicative focal area elements table), GEF-8 focal area strategies and objectives, theory of change, MEA/national strategy alignment, and core indicator targets.

If the project proponents intend to resubmit this project, please redesign into an eligible BD-LD-(CCM) MFA project with corresponding changes to the areas mentioned above.

Please note, that the PROGRAMMING of funds should reflect the allocation of funds for this project to the focal areas in which the project intends to produce results. This could be a different allocation than the SOURCE of funds given full flexibility in GEF-8.

2) Source of funds table: The table SOURCE of Funds in Portal is wrongly presented. Instead of presenting as is (broken down per the three focal areas), the SOURCE focal area of the funds being used for this project should be presented by AGENCY (assuming the source of funds reflected in the LOE is accurate-then the source of funds table in the Portal needs to match that. If for some reason the LOE doesn't accurately depict the SOURCE focal area of the funds used, in that case the LOE needs revision.

3) The executing agency listed in the project information table is different from the one listed in the LOE. Please correct one or the other.

4) A complete, consolidated review will be provided once a fully eligible PIF, in line with LoE source funding and correctly aligned with focal area objectives is re-submitted. Please also address initial comments made further below in this first partial review.

10/31/2025: Partly addressed.

a) The GEF project grant in Portal (\$6,478,899) is higher than the allocated amount in LoE (\$6,466,700) - please amend.

b) This is a Multi-Focal Area project that includes Climate Change Mitigation, reason why the field Project Sector in the General Project Information Table must be completed.

c) It is noted that a LoE signed by the new OFP is required.

12/08/2025: All addressed.

Agency's Comments

IUCN, 4 December 2025

a) Thank you very much for your comment. Kindly note that the uploaded updated LoE signed by the new OFP now reflects the same figures as those in the portal.

b) Thank you very much for your comment. As advised the Project Sector in the General project Information Table is now completed in the portal consistent with the PIF word version

c) Thank you very much for your comment. The updated LoE signed by the new OFP is now uploaded

IUCN, 22 October 2025

1) Thank you for your feedback. We have changed the entire results framework and the ToC to align with the multi-focal area objectives.

Kindly note that we have uploaded the updated LoE with the correct budget allocations. However, since then we have changed the title and objective of the project; which needs to be reflected in a further updated LoE. Due to the Diwali festival holidays, we were not able to obtain the further updated LoE in time and will submit with the next resubmission.

2) Thank you very much for the feedback. We have updated the portal to reflect the LoE. We have also requested MoEFCC to amend the LoE to align with the project's new title. There are no changes to the funding source or the total amount.

3) Thank you for flagging this. We have corrected the name to "Ministry of Environment, Forest and Climate Change (MoEFCC)" in both the PIF and the portal.

4) Noted with thanks. We have made amendments addressing all comments from the GEF Secretariat.

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

10/01/2025: Please make revisions as needed in line with comments made above.

10/31/2025: Addressed.

Agency's Comments

IUCN, 22 October 2025

Thank you for the comment. We have revised the PIF and updated the project summary to concisely state the problem (multi-driver biodiversity loss and degradation: fire, invasive species, edge agriculture/erosion, and unsustainable extraction), the objective, and the strategy to deliver GEBs . The summary now explains that the project will institutionalize a cross-sector ILM architecture in each state, with state ILM strategies mainstreamed into 10 instruments with budget-tagging to raise ILM-aligned public spending. It will also implement locally led ILM across 167,899 ha of critical PA landscapes and 300,000 ha of priority forests/production lands using ILM approaches and presents the key targets of the GEBs.

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

10/01/2025: Please make revisions as needed in line with comments made above.

10/31/2025: Addressed.

Agency's Comments

IUCN, 22 October 2025

Well noted with thanks. We have amended the PIF following the revised results framework, including the objective and ToC.

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

Secretariat's Comments 10/31/2025: Yes.

Agency's Comments

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

10/01/2025: Not fully.

- PMC funding / co-funding is not proportional.

10/31/2025: Not addressed.

While the Review Sheet response indicates proportionality between the GEF and the co-financing resources allocated to PMC, the current level allocated from co-financing is 4.4% compared with the 5% from GEF resources. Specifically, for a co-financing of \$48,800,367, the 5% should be \$2,440,000. Please amend.

12/08/2025: Addressed.

Agency's Comments

IUCN, 4 December 2025

Thank you very much for your comment. As advised, the cofinancing is now corrected and shows as USD 2, 440, 000 in the word version of the PIF and in the portal version of the PIF. Accordingly the cofinancing has been adjusted against Component 2.

IUCN, 22 October 2025

Thank you for your feedback. We have amended the co-financing figures, increasing the PMC's co-finance to \$2,159,633 (which equals to 7x the PMC).

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 10/31/2025: Yes.

Agency's Comments

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 10/31/2025: Addressed.

Agency's Comments

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

10/01/2025: May need revision based on revised focal area objectives alignment.

10/31/2025: Addressed.

Agency's Comments

IUCN, 22 October 2025

Thank you very much for your feedback.

We have amended the results framework, and hence the ToC of the project. The project has now emphasized on mainstreaming and implementation of ILM solutions/strategies into forest restoration and biodiversity conservation actions.

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 10/01/2025: Yes.

Agency's Comments

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

10/01/2025:

- Please provide a rationale for the proposed arrangement of two GEF agencies being selected to implement the project. While such an arrangement is not in violation of GEF policies, it is nevertheless very rare and not considered best practice. Please explain the advantages of this proposed arrangements compared to the enhanced complexity and transaction costs in project

oversight. Further, please note that the implementing agencies cannot execute the project and that any changes during the project implementation may be considered major amendments.

10/31/2025: Addressed.

- Rationale has been provided and is noted.

Agency's Comments

IUCN, 22 October 2025

Thank you for your feedback.

Selecting UNDP and IUCN together is intentional and complementary. UNDP brings long-standing policy integration and systems capacity with MoEFCC and states (NBSAP formulation, NDMA's National Forest Fire Programme, SAPCCs, risk-informed planning, Van Panchayats/JFM support, BIOFIN, and upcoming GEF GBFF/OECM projects), enabling cross-sector governance, financing convergence, and scalable, state-owned delivery. IUCN contributes globally recognized technical leadership on protected and conserved areas (IUCN categories, Green List standard and certification), OECM recognition, restoration science, invasive-species management, and Protected Planet/Wdpa data stewardship; plus in-country experience on forest landscape restoration and 'sustainable agriscapes.' Both agencies have an established presence in multiple states and at the grassroots level?UNDP through state offices and community-driven programmes, and IUCN through state partnerships and restoration pilots?enabling effective global-to-local integration and translation of policies into on-ground outcomes. Together, this co-implementation bridges policy and finance (UNDP) with ecosystem science and standards (IUCN), which is precisely what ILM across PAs and production landscapes requires to deliver BD-1, LD-1/2 and CCM-1.4 outcomes.

We recognize the added coordination burden and will minimize transaction costs through a single national executing modality under MoEFCC, one Project Steering Committee chaired by MoEFCC, and one Joint PMU with a unified Annual Work Plan & Budget, harmonized safeguards, a single results/MRV system, joint supervision missions, and consolidated reporting (PIR) to the GEF.

Also to avoid duplication, the project will adopt a clear division of labor: UNDP leads component 1 and partially component 3 (policy/coordination, convergence financing, capacity development and knowledge systems); while IUCN leads component 2 and partially component 3 (landscape level ILM implementation). Any material changes to roles or scope will be treated as major amendments and cleared with the GEF in line with policy. This arrangement preserves the benefits of complementary technical strengths of both agencies, while containing oversight complexity and assuring national ownership, efficiency, and scale.

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

10/01/2025:

- The project is requesting LD focal area funding and is partly aligned with LD-1 focal area objectives. Therefore, it would be expected that the project generates LD related GEBs under sub-indicator 4.3. Please consider listing the 73,900 ha targeted under CI 4.1 under CI 4.3 instead, if those areas are in production landscapes outside PAs.

- Please make sure that GHG emission reduction targets are based on actual activities that generate carbon benefits (as opposed to fire management planning only).

10/31/2025: Above comments have been addressed. In addition, Under core indicator 1, please provide the WDPAs IDs for listed protected areas.

12/08/2025: Addressed. The MoEFCC has confirmed that the three target PAs are not yet listed in the WDPAs.

Agency's Comments

IUCN, 4 December 2025

Thank you for the feedback. The MoEFCC has confirmed that the three target PAs are not yet listed in the WDPAs. At present, only about 6% of India's designated protected areas are registered in the WDPAs.

IUCN, 22 October 2025

Thank you very much for your feedback.

We have amended the core indicator targets, as follows:

1) Core Indicator 1: Originally, a total of (722,400 ha) was designated as Elephant Reserve in West Singhbhum under Project Elephant of the Government of India ? and hence during the first PIF submission in September 2025, the project indicated this total as the target PA area for improved management in Jharkhand State. However, as of October 2025, out of this Project Elephant area, the Supreme Court of India has directed the Jharkhand Government to declare approximately 31,486 hectares (about 314.86 km²) as a wildlife sanctuary (Protected Area under the Wildlife Protection Act).

We have included this explanation on p.28 of the PIF.

2) Core Indicator 4: the target for this indicator has increased from 73,900 ha to 300,000 ha, consisting of:

- 200,000 ha of critical/degraded forest landscapes under improved management to benefit biodiversity (Sub Indicator 4.1). The project intends to contribute to the objectives of BD-1-1, 1-3 and 1-4 in additions to LD-1, LD-2 and CCM-1-4. Most of the delivery for BD objectives will be delivered through the implementation of interventions across these 200,000 ha.

- 100,000 ha of critical/degraded landscapes under sustainable land management in production systems (Sub Indicator 4.3). The interventions across these 100,000 ha will predominantly contribute to objectives under LD-1 and LD-2.

3) Core Indicator 6: Thank you for the feedback. We have revised the GHG emission calculations to adopt a conservative approach. The mitigation estimates are derived from the following:

- Improved management through ILM implementation facilitated by the project across 25% of the target PA landscapes (core indicator 1), which equals to 41,975 ha. Improved management in the remaining PA landscapes will be done through government's co-financing.

- Improved management through ILM implementation facilitated by the project across 25% of the critical/degraded forest landscapes (core indicator 4.1), which equals to 50,000. Improved management in the remaining PA landscapes will be done through multi-parties' co-financing and scale-up planning.

However, due to the absence of the baseline information on the production landscapes, the current carbon estimate does not take into account the mitigation potential of these areas.

At the PPG, the project will re-assess carbon mitigation potential, especially once the baseline information on the target productive landscapes has been obtained.

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

Secretariat's Comments n/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

10/31/2025: Revisions & clarification requested.

1. Environmental and social safeguards: We note that IUCN attached Preliminary ESMS Screening, and an overall ESS risk is classified as Moderate. Both Jharkhand and Uttarakhand have significant Indigenous Peoples (Scheduled Tribes) populations with distinct identities, rights, and vulnerabilities, and it is critical to involve them in the project from early stage.

a. From the provided documents, it is not clear whether any consultations with Indigenous Peoples groups and representatives of marginalized populations take place to prepare PIF. Please clarify engagement with Indigenous Peoples groups and representatives of marginalized populations to develop this PIF. Did any consultations take place to develop the PIF?

b. Preliminary ESMS Screening said that "[a]n Tribal Peoples Planning Framework can convey the work carried out during the PPG phase, then providing the protocols to continue the

FPIC process and create a Tribal Peoples Plan during the first year of project implementation?. However, please note that first FPIC for project design of CEO Endorsement needs to be obtained at the CEO Endorsement stage and revise the Preliminary ESMS Screening.

c. The PIF states that "[d]uring the Project Preparation Grant (PPG) phase, SES risks will be reassessed, and appropriate safeguard instruments will be developed, including the Environmental and Social Management Framework (ESMF), Grievance Redress Mechanism (GRM) framework, Gender Action Plan (GAP), Stakeholder Engagement Plan (SEP), and an Indigenous Peoples Plan (IPP) or TPLC Plan, as applicable." Integrated Landscape Management projects in these states must be designed with robust social assessments, inclusive consultations, and tailored benefit-sharing mechanisms to avoid adverse impacts and to realize the potential for sustainable, equitable development. Please ensure that these measures are taken during PPG.

d. India's legal protections provide a strong foundation for this, but effective implementation depends on genuine participation, respect for Indigenous knowledge, and adaptive management throughout the project lifecycle. Please consider integrating traditional and local knowledge, and co-management with Indigenous Peoples and marginalized populations into project design.

e. Please also consider including some indicators related to integration of traditional and local knowledge and co-management of the landscape with Indigenous Peoples and other marginalized populations.

f. Please kindly provide summary of key risks and their management plans during PPG and project implementation in the environmental and social section of the Key Risks table.

2. Under Key Risk table, please explain how overall risk was identified.

12/08/2025: Addressed

Agency's Comments

IUCN, 4 December 2025

Many thanks for the thorough and helpful comments. Responses are provided below:

1a) Many apologies for the earlier lack of clarity. The team conducted consultations with local communities in Jharkhand, including with local CSOs whose boards include Scheduled Tribe (ST) representatives, and we have added these consultations to Table 1 of the stakeholder annex, as follows:

12/08/2025	Scheduled Tribe representatives	Chhotanaga and villages, West Singhbhum, Jharkhand	Meetings were held with 27 community members in Chhotanaga, West Singhbhum (Jharkhand) to discuss conservation, local livelihoods, and governance mechanisms. Participants included four members of the Mundas tribe and one representative of the Munda tribe (Munda) - both indigenous and Scheduled Tribes in Jharkhand. The Munda participants are involved in fire-fore creation, serve as fire watchmen, and are part of the Eco-Development Committee. Twelve women and one man from the Mukadam Ecosystem Group are members of the Eco-Development Committee - attended, they belong to the Munda community (Scheduled Caste). All participants are from marginalized social populations facing social and economic exclusion.
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Due to time constraints during PIF development, consultations with local communities in Uttarakhand could not be undertaken. However, more in-depth engagement and consultations - especially with ST and other marginalized groups - will be carried out in the next phase.

1b) The important clarification concerning FPIC is well-noted. The ESMS screening report has been revised and resubmitted to address this point.

1c) the comment is well-noted, and the project will ensure that the measures are fully implemented during the PPG phase.

1d) the PIF makes a concerted effort to highlight the important role for local and traditional knowledge in the development of co-management strategies for the project. By this, we absolutely include knowledge systems of Scheduled Tribes and marginalised groups in forest areas. Both IUCN and UNDP take this aspect seriously and affirm the intention that it is an integral component of project design.

1e) The comment is acknowledged. Indicators will be further developed during the PPG phase, and we will ensure the inclusion of indicators relating to use of local and traditional knowledge, and incorporation of co-management strategies.

1f) Well noted with thanks. We have updated the SES risk narrative in the Risk Table, which now summarizes the key risks and their management plans during the PPG and project implementation.

2. We have provided a brief narrative (in the Risk table) in the PIF, explaining how the key risks were identified and determined.

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 10/01/2025: Yes.

Agency's Comments

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

10/01/2025: No. Please address the the following points and re-design the PIF accordingly.

Alignment with BD focal area objectives:

The closest entry point is the GEF-8 BD-1 objective, which is dedicated to integrated landscape/seascape management approaches that use multiple tools and strategies to respond to the drivers of biodiversity loss within large landscape and seascape mosaics. The GE-8 BD strategy recognizes the need to address simultaneously multiple drivers to achieve benefits for biodiversity. While we recognize that changes in fire regimes have become a serious threat for biodiversity, it is unclear that addressing fire will be sufficient in the targeted landscapes for the persistence of globally significant biodiversity. Please revise to ensure that the project undertakes a truly integrated landscape approach, where fire will be addressed as one, and possibly the main, driver of biodiversity loss, or justify that fire has become the overriding driver of biodiversity loss in the targeted landscapes and a substantial number of other Indian landscapes hosting globally significant biodiversity.

In the revisions, please:

- clarify the boundaries of the targeted landscapes, how they have been determined and provide a comprehensive assessment of the drivers of biodiversity loss in these landscapes. In this context, please clarify if fire is the main driver of biodiversity loss or only one among others,

- ensure all sectors relevant to the identified drivers of biodiversity loss are addressed in the project design. The project is currently focused on changing practices in the restoration and conservation sectors to prevent fires, when it seems that larger interventions in, e.g., the agriculture and forestry sectors would be required to ensure durable benefits for biodiversity, including in relation to fire regimes,

-make clear that wildfires are a fundamental ecological process, which continues to be a source of biodiversity across the globe, with many plants, animals, and ecosystems that depend on particular temporal and spatial patterns of fire. It is rather the detrimental impacts on biodiversity of changes in fire regimes due to the combined effects of human activities that the project is to target. Hence, please make sure to document how fire regimes have changed and have impacted or are projected to impact biodiversity of global significance in India, and in the targeted landscapes in particular,

-clarify what is meant in practice by 'fire-smart' management/practices/solutions in the context of this project, with evidence linking these to biodiversity outcomes as may have been demonstrated in other landscapes and contexts (see e.g., Kelly et al. 2020 <https://doi.org/10.1126/science.abb0355>).

Alignment with LD focal area objectives:

- While the PIF is correctly aligned with objective LD-1, the only output contributing to this alignment seems to be 2.4. If that is the case, the amount going towards LD-1 may be too high. Please clarify.

Alignment with CC-M focal area objectives:

- Please clarify what activities in practice are entailed in terms of nature based solutions as the word is used throughout the PIF without clarity on whether it entail CCM eligible activities - and what are the landscapes/ecosystems to be conserved and restored and how activities are expected to address underlying drivers of degradation and lead to a relative increase in biomass. CC-M objectives should only be selected if fire is indeed the main driver and the nature-based solutions are intended to address it.

- Furthermore, similarly to nature based solutions please clarify what is meant by climate smart agriculture activities in practice, in terms of agricultural/SLM techniques.

10/31/2025: Addressed.

Agency's Comments

IUCN, 22 October 2025

Thank you very much for your feedback.

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Alignment with BD and other focal areas:

The project has been reframed as an ILM operation in which fire is treated as one of multiple, interacting drivers - alongside invasive alien species, encroachment/unsustainable extraction, agriculture at forest?farm interfaces, and mining/linear infrastructure - now mainstreamed across state and landscape-level planning and implementation. Objective, outcomes and outputs have explicitly integrated fire-smart measures within broader ILM strategies rather than as a single-threat program.

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Landscape boundary:

The project targets West Singhbhum District (Jharkhand) and Nainital & Almora Districts (Uttarakhand). In these landscapes, forest fire is one of key drivers of biodiversity loss and land degradation. The PIF has been amended to describe the non-fire drivers and how they interact to exacerbate biodiversity loss and degradation in these districts.

The target landscapes comprise of the target PAs and non-PA landscapes. The boundaries of the West Singhbhum's Reserve and non-PA landscapes presented at the PIF stage are indicative. The delineation of the landscape boundaries will be refined during the PPG through more in-depth assessment and consultation with the state and other sub-national governments and stakeholders to determine precise landscape delineations. In finalizing the landscape boundaries during the PPG, the landscape selection will be based on the following criteria:

- ? Significant presence of critical/degraded forests and Key Biodiversity Areas (KBAs) under deforestation and degradation pressure; and
- ? High vulnerability to forest-fire risk and other drivers of biodiversity loss and land degradation.
- ? Potential to contribute to the achievement of the GEB targets.
- ? Baseline of existing investments, partners and capacities supporting ILM implementation.
- ? Presence of tribal and other marginalized groups.
- ? Presence of women-led CBOs (community-based organizations).

Multi-sectoral ILM approach:

The revised results framework ensures that all sectors contributing to biodiversity loss and land degradation are addressed. Each state will adopt cross-sector ILM strategies embedded in key policy and planning instruments of the states: SBSAPs, SAPCDs, State Fire Plans, forest working plans, CFR/community plans, and decentralized development plans. The strategy includes budget tagging to increase ILM-aligned public spending by at least 25%, and establishes clear convergence pathways with the agriculture, rural development, mining, and infrastructure sectors (e.g., CAMPA, MG-NREGA, Green India Mission, NRLM, CSR and so on).

Intersection of fires-human activities:

Thank you for the feedback. We have revised A.1. Baseline Situational Analysis & Threats - specifically paragraphs 275 (pp. 678) - to explicitly recognize fire as a natural ecological process while documenting shifts in fire regimes driven by human activities and climate stress (earlier onset, longer seasons, higher frequency/intensity, and expanded burn extents). The text now clarifies that the project targets these detrimental regime changes through ILM solutions, including interactions with invasive fuels, forest-farm edge pressures, and fragmentation.

At the PPG stage, we will strengthen this baseline with landscape-level field assessments.

Fire-smart + Regenerative agriculture approaches:

Fire-smart measures are embedded inside ILM plans and include community SOPs that link the national EWS to village protocols; strategic fuel-breaks and fire-line restoration; assisted natural regeneration and native, fire-resilient planting; pine-needle removal/use; controlled grazing/biomass management; and stewardship agreements. We have included in the description of Outcome 2.1 the description of the project's fire-smart approach as follows:

At the landscape level implementation, the project will enable community-driven ILM implementation through integrated, biodiversity-friendly and fire-smart restoration-conservation and livelihood measures:

- ? *Fuel-load management using ecological methods, such as selective removal of invasive fire-prone species (Lantana, Eupatorium), enrichment planting with native broadleaf species (e.g., Quercus, Bauhinia, Myrica, Terminalia), and promoting mixed-species mosaics that reduce flammability and enhance habitat quality.*
- ? *Creation of bio-buffers and green firebreaks using native grass belts, fodder banks, and less-flammable shrubs (e.g., Carissa, Dodonaea, Rhus), which both interrupt fire paths and provide habitat and fodder for wildlife and livestock.*
- ? *Community-managed fire lines reinforced with green cover, organic mulching, and moisture retention features to minimize soil exposure and erosion*
- ? *Sustainable fuel and fiber alternatives, including pine-needle briquettes, biomass pellets, and resin waste recycling, reducing forest extraction pressures while generating circular-economy livelihoods.*
- ? *Fire-resilient livelihood systems, such as agroforestry with, beekeeping, non-timber forest produce value chains, and silvi-pasture systems that maintain ground cover and prevent invasive spread.*
- ? *Community-based early warning and response through Van Panchayats and JFMCs equipped with mobile-based alerts, local fire squads, and village contingency funds, ensuring biodiversity-friendly suppression actions that avoid unnecessary damage to wildlife habitats.*

Alignment with MFA:

We have amended the project's results framework so that interventions now align with GEF-8 objectives BD-1, LD-1, LD-2, and CCM-1.4. Section D (Alignment with GEF-8 programming strategies and country/regional priorities?) includes a table that maps each outcome/output to these focal areas and summarizes the project's contributions.

CCM focal area alignment:

NbS (or India's context ? Ecosystem-based Approaches/EBAs) under Outcome 2 comprise refers to landscape and ecosystem management actions that (i) reduce the frequency/severity/extent of damaging fires and other degradation pressures, and (ii) increase living biomass and carbon stocks through restoration and sustainable use. The project will consider the following NbS/EBAs interventions, which details are provided in the narratives of Outcome 2 of the PIF:

? Restoration of sal-dominated forests (Jharkhand) and pine-oak/broadleaf mosaics (Uttarakhand);

? Fire-smart, conservation agroforestry and agriculture in productive lands;

? and practices that reduce burn frequency/severity and rebuild biomass (ANR, native enrichment, agroforestry woodlots/fodder banks, soil-moisture conservation).

These avoid combustion emissions and increase living biomass, contributing an estimated

As for the target landscapes, the project will focus on the following:

? Jharkhand (West Singhbhum): sal-dominated dry deciduous forests (inside PAs and buffers), community forests at the forest-farm interface, riparian corridors, and selected mining-affected compartments targeted for ecological reclamation.

? Uttarakhand (Nainital & Almora): mid-elevation chir-pine?oak/broadleaf mosaics, oak-rhododendron belts, PA cores and buffers, springsheds and riparian strips, and community forests/farm edges.

? As for agriculture landscapes, the project will conduct in depth landscape identification at the PPG to ensure alignment with *Nature-based solutions and/or Ecosystem-based approaches* focus of this project.

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Climate smart agriculture clarification:

The project has now used the term 'regenerative agriculture', which will work on establishing sustainable and nature-positive multifunctional agricultural landscapes, ones which sustainably and equitably use, conserve and restore biodiversity and ecosystem integrity, and safeguard food security, nutrition and local livelihoods. Integrating regenerative agriculture into the ILM framework will strengthen both biodiversity and livelihood outcomes while reducing landscape-level fire vulnerability. Below is a set of regenerative agriculture interventions that will be embedded in the project's community-driven ILM activities, particularly in buffer zones, forest fringes, and production landscapes of the project sites.

The proposed regenerative agriculture activities include- Fire-smart agroforestry and integrated land-use systems, soil and water conservation with regenerative practices, diversified and climate-resilient cropping systems, livelihood-linked regenerative enterprises, capacity building and extension for regenerative farming,

Specifically, we added the following explanation in the PIF under Outcome 2.1:

?...On production lands, the project will promote regenerative agriculture and agroforestry systems at forest?farm interfaces to rebuild soils, cut erosion, and lower fire risk while diversifying incomes. The project will facilitate a shift from residue burning to mulching/cover crops with minimum tillage, stabilize slopes with contour/terrace bunding and rainwater harvesting, and adopt diversified intercropping. Field edges and terrace risers will add agroforestry and silvopasture (fodder banks, fruit/native trees) to reduce open grazing in forests, while invasive biomass and pine needles are converted to compost/biochar and briquettes rather than burned. Together these measures raise soil organic carbon and on-farm biomass, reduce fine-fuel loads at forest edges, and strengthen nature-positive value chains)?

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

10/01/2025: Not fully.

- the alignment with national policies will need to be revisited and linked closely to revised focal area objectives.

10/31/2025: Addressed.

Agency's Comments

IUCN, 22 October 2025

Well noted with thanks. We have revised the section describing alignment with national policies. It now includes relevant policies on biodiversity conservation, land degradation neutrality, and related areas, and is fully aligned with the project's multi-focal area objectives. **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 10/31/2025: Yes.

Agency's Comments

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments 10/01/2025: Yes.

Agency's Comments

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

Secretariat's Comments 10/01/2025: Yes.

Agency's Comments

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

10/01/2025: As mentioned above:

Please note, that the PROGRAMMING of funds should reflect the allocation of funds for this project to the focal areas in which the project intends to produce results. This could be a different allocation than the SOURCE of funds given full flexibility in GEF-8.

Source of funds table: The table SOURCE of Funds in Portal is wrongly presented. Instead of presenting as is (broken down per the three focal areas), the SOURCE focal area of the funds being used for this project should be presented by AGENCY (assuming the source of funds reflected in the LOE is accurate-then the source of funds table in the Portal needs to match that. If for some reason the LOE doesn't accurately depict the SOURCE focal area of the funds used, in that case the LOE needs revision.

10/31/2025: Addressed.

Agency's Comments

IUCN, 22 October 2025

Thank you for your kind guidance. We have amended the financing tables to both in the PIF and portal to reflect the LoE.

Focal Area allocation?

Secretariat's Comments 10/01/2025: See comments above.

Agency's Comments

IUCN, 22 October 2025

Kindly please refer to our response above

LDCF under the principle of equitable access?

Secretariat's Comments n/a

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments n/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

10/01/2025: Yes. However, the PPG breakdown is not in line with what is listed in the LOE.

10/31/2025: Addressed.

Agency's Comments

IUCN, 22 October 2025

Many thanks for flagging this out. We have amended the breakdown in the portal.

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 Comments10/31/2025: Yes.

Agency's Comments

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

10/01/2025: No.

Please submit a LoE signed by the official OFP.

12/08/2025: Addressed

Agency's Comments

IUCN, 4 December 2025

Thank you very much for the feedback. Kindly note that the updated LoE signed by the new OFP has now been uploaded.

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

Secretariat's Comments 10/01/2025: Yes.

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

10/01/2025: No.

- Please address inconsistencies with portal entries pointed out throughout the review sheet.

10/31/2025: Addressed. However, a signature by the new OFP is required on the LoE.

12/08/2025: Addressed

Agency's Comments

IUCN, 22 October 2025

Well noted with thanks. We have made changes in the portal entries.

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 Comments n/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 10/01/2025: 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 Comments10/01/2025: Yes.

Agency's Comments

Annex E: Rio Markers

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

Secretariat's Comments10/31/2025: Yes.

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments10/01/2025: Yes.

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

10/01/2025: No. The PIF needs to be redesigned to be considered for funding. A complete, consolidated review will be provided once a fully eligible PIF, correctly aligned with focal area objectives is submitted. Please address all initial comments made in this first partial review.

11/18/2025: No. Please address comments made in this review.

12/08/2025: Yes. The PIF is recommended for CEO clearance for a future work program, pending availability of resources.

Agency's Comments

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

Secretariat's Comments Please ensure that in the development of the project results framework, gender-specific indicators are included to facilitate monitoring and reporting. In the development of the Gender Action Plan, please indicate measures to facilitate and support its implementation (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

Agency's Comments

IUCN, 4 December 2025

Thank you very much for these comments which are duly noted for the PPG phase

Review Dates

	PIF Review	Agency Response
First Review	10/1/2025	10/22/2025
Additional Review (as necessary)	11/18/2025	12/4/2025
Additional Review (as necessary)	12/8/2025	
Additional Review (as necessary)		
Additional Review (as necessary)		