Safeguarding the future of Namibia?s Protected Area Network through Financing4Future

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID
11523
Countries
Namibia
Project Name
Safeguarding the future of Namibia?s Protected Area Network through Financing4Future
Agencies
WWF-US
Date received by PM
6/23/2025
Review completed by PM

Program Manager
Jean-Marc Sinnassamy
Focal Area
Biodiversity
Project Type
FSP

PIF
CEO
Part I - General Project Information

1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?

Secretariat comment at CEO Endorsement Request

July 07, 2025

Yes. The Ministry of Environment, Forestry, and Tourism is listed as executing partner, as refered in the LoE.

Agency Response

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

Secretariat comment at CEO Endorsement RequestYes

Agency Response

2. Project Summary.
a) 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 outcomes?
b) Does the summary capture the essence of the project and is it within the max. of 250 words?

Secretariat comment at CEO Endorsement RequestAddressed.

Agency Response

3. Project Description Overview
a) Is the project objective statement concise, clear and measurable?
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?
c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
e) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

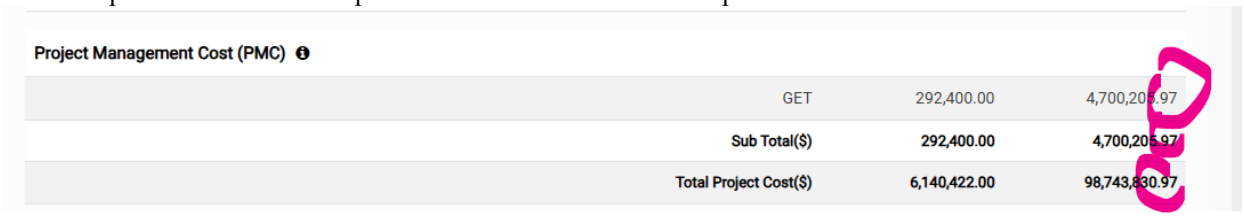
Secretariat comment at CEO Endorsement Request

November 1, 2025

Addressed.

November 20, 2025

- The last point is not addressed: please remove the decimals in the portal.

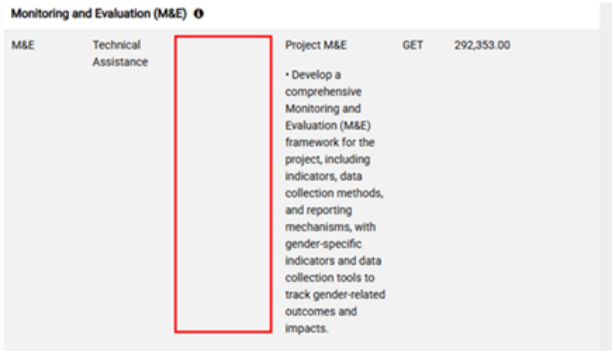


October 29, 2025

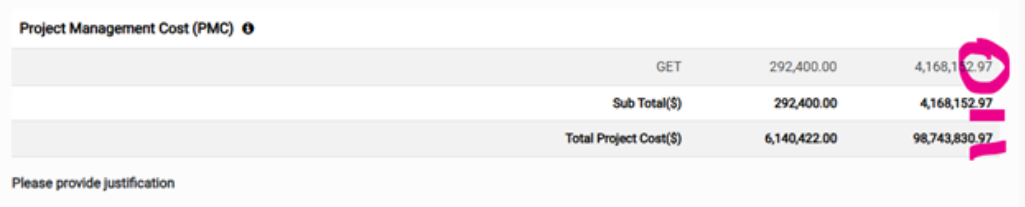
- We take note of the improvements. However, all GEF project components should show a certain level of cofinancing, including M&E. Here, there is no cofinancing in front of M&E. Please, correct.



- Additionally, we would like to add that the M&E component is missing the project outcomes.

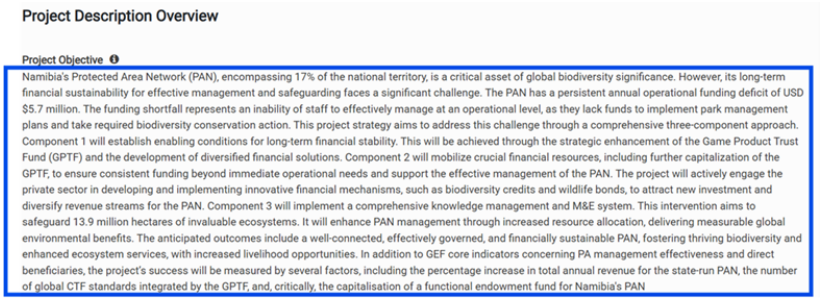


- For the technical components, the cofinancing ratio is 1:16. It should be in the same range for pmc - here the ratio is #1:14 and you included two digits after the comma - something that does not make sense for this kind of amount. Please, correct.

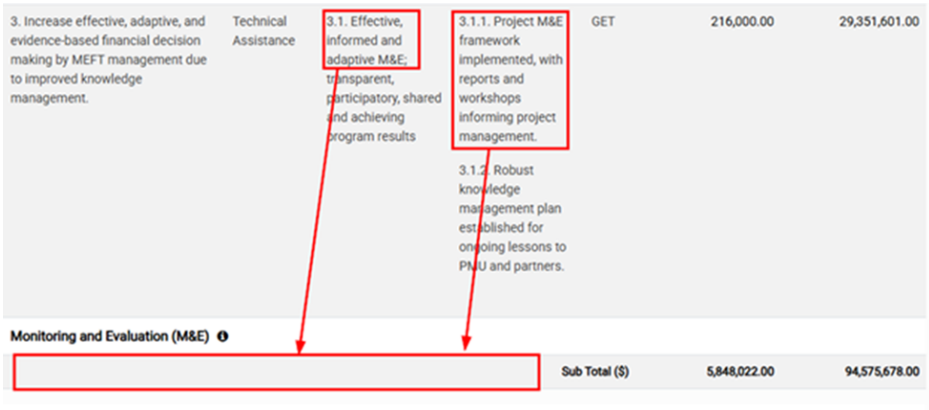


September 3, 2025

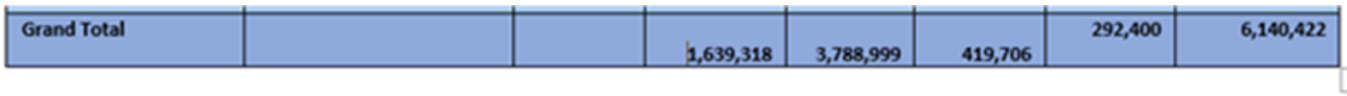
Control Quality: The Agency failed to follow the guidance to write the objective in a ?concise, measurable, and that can be achieved at completion?. Instead, it is a summary. Please ask the Agency to amend.



- M&E has been added as one component within the other components, leaving the stand-alone M&E component empty. Please ask the Agency removing it and add all M&E information to the M&E section that is currently empty. See screenshot below for ease of reference.



- The total for each component in the overview table does not match the total for each component presented in the budget table. Please request the agency to amend.



July 07, 2025

- The result framework is aligned to the PIF.

- GEF financing and cofinancing represent a ratio of 1:16.17.

- For pmc, GEF financing and cofinancing represent a ratio of 1:14.25.

Agency Response

WWF-GEF Agency Response (11.19.2025):

- Thank you for this comment. The total has been rounded down by 1 dollar. The decimals in the portal will appear as ".00" now. The portal cannot display figures without the decimals in this table. We have worked previously with the GEF ITSOP team to attempt to remove the decimals on the back end but this was not possible.

WWF-GEF Agency (11.19.2025):

-Thank you for the comment, we regret the oversight. The project description overview table (Table B) and relevant portal entries have been corrected so that they now include co-financing proportionate to the GEF?s contribution to the project?s M&E costs.

-Thank you for the comment. The M&E component in the project description overview table has been updated to include an outcome statement and better labelled outputs. An outcome statement and associated outputs have been added also in the project strategy section of the CEO Endorsement Request for the sake of consistency.

-Thank you for the comment. In response, the cofinancing amounts listed in the project description overview table (Table B) have been redistributed across the components so that the

ratio of GEF funds to cofinancing is 1:16 across the board. Also, the figures have been adjusted so that they no longer contain decimals.

WWF-GEF Agency (10.17.2025):

Thank you for your comment. In the previous submission, the project?s short description had been placed where the project objective statement should have been. The error has been corrected. The objective statement reads: ?**To ensure long term financial sustainability for effective management and safeguarding of Namibia?s existing state-run Protected Area Network (PAN).**?

Thank you for the comment, we regret the oversight. The ?Project Description Overview? table in the CER has been updated so that M&E has its own stand-alone section. The ?Project Description? has also been adjusted accordingly. Changes appear in pink highlight. They include: removing the M&E sections from Component 3 in section B.2 ?Project Strategy,? and adding content regarding the project?s M&E system at the end of Section B.2 of the ?Project Strategy.?

We have aligned the figures in the CER Overview Table with the budget. These adjustments to the ?Project Description Overview? table are now highlighted in pink for ease of reference.

4. Project Outline
A. Project Rationale
a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?
b) Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?
c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?

Secretariat comment at CEO Endorsement Request

Yes

About the stakeholders involved in this project, the terrestrial PAN is primarily managed by the Ministry of Environment, Forestry and Tourism (MEFT) through its Directorate of Wildlife and National Parks (DWNP) and Directorate of Forestry (DoF). This formal network is complemented by 86 communal conservancies, 48 community forests, private nature reserves, and freehold farms.

Agency Response

5 B. Project Description
5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?
b) 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?
c) Are the project components (interventions and activities) described and proposed solutions and

critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?
d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?
f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?
g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?
h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?
i) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?
j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?
k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?
l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

September 03, 2025

Addressed.

July 07, 2025

- Gender and women issues are absent from the result framework. Please, reformulate some outputs and eventually some outcomes: 1.2, 1.3, 2.1,

- The limited support from domestic finance to the protected area network is mentioned as a recurrent problem. However, we are not clearly seeing the strategy to change the situation: updating the assessments of the economic value of Namibia's protected areas and enhancing the capacities do not seem enough to change the situation. Please, clarify.

- To address the insufficient multisectoral coordination, we are not seeing a platform to gather the different sectors with private and non-governmental stakeholders. Please, explain and correct.

Agency Response

WWF GEF Agency Response 7.31.2025:

Thank you for your comments.

Gender Responsiveness:

Gender dimensions are explicitly and comprehensively integrated throughout the project components, outcomes, and outputs, and are fully budgeted for. The CER document, in the project description section, contains detailed information about the project?s gender and GESI-responsive activities. In response to the comment, we have reformulated specific outputs under Outcomes 1.2, 1.3, and 2.1 and updated the Results Framework. Additionally, please check the uploaded revised CEO ER document in the roadmap where the changes have been highlighted in yellow for easy review.

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These changes explicitly highlight gender considerations in economic valuation, institutional capacity building, financial management systems, and revenue generation strategies. The modifications make it clearer that gender equity is not merely an underlying principle but an actionable and measurable component of the project's results framework. This approach aligns with the detailed Gender Action Plan, which outlines specific gender-responsive activities, indicators, and timelines, and is further supported by dedicated budgetary allocations for gender-specific interventions. The project is committed to fostering inclusive and equitable outcomes, recognizing the vital role of women and diverse groups in natural resource management and conservation.

The project has a dedicated **Gender Analysis Framework**, which includes a detailed **Gender Action Plan (GAP)**. This GAP outlines specific gender-sensitive actions, indicators, and targets for *every outcome and output* across all three project components. For instance, under Output 1.2.1 (Forestry Decision-Making Tools), activities include developing a "gender-balanced comprehensive training program" and conducting a "gender-sensitive economic valuation of forest resources" to recognize the different uses and values for men and women. For Output 1.3.1 (GPTF Structure), the project explicitly ensures "gender equity in governance structure, policies and procedures" and provides "gender-responsive training" to GPTF staff and board members. Similarly, Output 2.1.1 (Institutional Reform for GPTF) details the establishment of a "change management team with gender balance and expertise in gender mainstreaming" to oversee implementation.

Furthermore, a full-time Gender, Environmental and Social (E&S) and Social Inclusion Specialist is a key budgeted position within the Project Management Unit (PMU) to ensure systematic implementation and monitoring of gender-responsive strategies throughout the project lifecycle. Budgetary allocations for gender-specific activities are also clearly outlined within the Gender Action Plan. ?

The project's approach to gender integration goes beyond mere inclusion; it is designed for comprehensive and transformative change. The detailed Gender Action Plan demonstrates how gender considerations are deeply embedded throughout the project design, from the methodologies for economic valuation (ensuring gender-disaggregated data collection) to the institutional reforms (promoting gender equity in governance structures) and the Monitoring & Evaluation indicators (incorporating gender-specific metrics). This holistic integration ensures that gender is treated as a fundamental, cross-cutting theme, rather than an isolated add-on. The dedicated Gender, Environmental and Social (E&S) and Social Inclusion Specialist further solidifies this commitment by providing continuous oversight and technical expertise to ensure gender-responsive implementation and monitoring across all project activities.

Limited Domestic Finance Strategy:

We agree that merely assessing economic value and building capacity, while crucial, is not be sufficient to fundamentally alter the funding landscape. Our project's core strategy goes beyond these foundational steps to actively transform the domestic financing model for the PAN.

Component 1 will actively advocate for and support the enactment of new or revised policies and legislation that will re-align national budget allocations towards conservation and to create the necessary legal framework for innovative domestic financing mechanisms (e.g., biodiversity offsets, direct retention of park revenues) to be effectively implemented and sustained. The economic valuation will provide an evidence base for the proposition that healthy biodiversity and robust conservation policies and practices are a sine qua non for healthy economies, and thus assist in the mobilization of political will and institutional change required to mobilize domestic resources for long term, sustainable conservation finance.

The project?s comprehensive and multi-pronged strategy to address the issue of limited support from domestic finance for the PA system. Includes:

Strengthening and Capitalizing the Game Product Trust Fund (GPTF): The GPTF is identified as the central, domestic long-term financing solution for the PAN. The project will enhance its institutional capacity to meet international Conservation Trust Fund (CTF) standards, improving its governance, financial systems, and resource mobilization capabilities (Outcome 1.3). Critically, a portion of the GEF grant will be used as initial capital investment to establish an endowment fund within the GPTF (Outcome 2.3, Output 2.3.1). This direct capitalization is intended to provide a stable, perpetual funding source for PAN management, reducing reliance on unpredictable, short-term funding [, page 1, Capital Investment (GPTF Endowment Fund)]. The project explicitly states that GEF funds supporting capitalization will only be disbursed once specific conditions regarding governance, safeguarding, and operational standards are met by the GPTF. ?

Diversifying Revenue Streams: Building on the enhanced GPTF, the project will actively design and implement new sustainable financial solutions (Outcome 2.2). This includes exploring and piloting mechanisms such as biodiversity credits, wildlife bonds, and landscape financing, which are identified as priorities from Component 1's feasibility assessments (Output 1.5.1). The project will also work to increase existing revenue sources, notably through the development and implementation of an increased conservation fee (Output 2.1.2). ?

Policy and Institutional Reforms: Beyond direct financial mechanisms, the project addresses systemic issues. It will identify and recommend broader institutional reforms within MEFT and associated entities (like Namibia Wildlife Resorts - NWR) to optimize income generation and management across the entire PAN (Outcome 1.4). A key policy output is the development of a Biodiversity Offset Policy Framework for Namibia (Output 1.5.2), which will create new finance streams from compensation mechanisms related to economic development impacts. ?

Private Sector Engagement: The project actively involves the private sector as both a stakeholder and a financier, leveraging their expertise and investment to attract new capital and diversify revenue streams for the PAN. This strategic collaboration is crucial for moving beyond traditional government and donor funding models. ?The goal of Component 2 is not just to mobilize resources, but to ensure these funds are channelled directly and predictably to on-the-ground PAN management activities. This addresses the historical issue of funds being diluted or diverted. The enhanced GPTF will be explicitly geared towards managing and efficiently disbursing these dedicated revenues.

Fostering Institutionalization of New Mechanisms: The project's approach will ensure that the new domestic financial solutions (e.g., biodiversity credits, wildlife bonds) are not just piloted but are fully designed, implemented, and eventually institutionalized within Namibia's financial architecture, with dedicated legal and financial structuring expertise. This establishes a permanent, diversified funding base from within the country. *Leveraging Private Sector Investment:* The strategy explicitly details how partnerships with the private sector will lead to direct investment into conservation, moving beyond co-financing commitments to actively engaging in revenue-generating mechanisms that benefit the PAN's long-term sustainability.

These elements underscore the project's commitment to creating a sustainable, domestically-driven financial model for Namibia's PAN, thereby reducing its reliance on unpredictable external donor support and ensuring the long-term safeguarding of its globally significant biodiversity assets. New content has been added to the SEP regarding private nature reserves, and a map of Namibia?s system of private nature reserves added to the CEO ER.

The project?s comprehensive approach, combining direct capitalization, diversification of funding sources, systemic policy and institutional reforms, and robust private sector engagement, goes significantly beyond mere assessments and capacity building. It creates a resilient and diversified funding base for PAN management, fundamentally transforming the financial model and reducing reliance on unpredictable funding sources.

Insufficient multisectoral coordination

The review comment highlighted a perceived gap in multisectoral coordination, specifically regarding a platform to gather different sectors, including private and non-governmental stakeholders. To address this, a number of changes have been made to clarify and strengthen the project's commitment to inclusive multisectoral engagement. The key changes are described below. Please note that the original submission explicitly addressed the issue of insufficient multisectoral coordination by establishing and leveraging a dedicated platform designed to gather different sectors, including private and non-governmental stakeholders. This platform is the **Collaboration Advisory Group (CAG)**.

Under Output 1.4.1, the project commits to "Establish a gender-balanced Collaboration Advisory Group (CAG) comprising representatives from MEFT (including the Directorate of Wildlife and National Parks and the Directorate of Forestry), the Environmental Investment Fund (EIF), KfW Sustainable Financing Mechanisms Project (SFP), and other relevant institutions as needed, such as Namibia Wildlife Resorts (NWR), Namibian Association of Community-Based Natural Resources Management Support Organisations (NACSO), and the National Planning Commission (NPC)". This CAG is specifically designed to be a crucial platform for the GEF project's strategic review of the broader institutional landscape beyond just the GPTF, fostering alignment and coordination among diverse stakeholders. ?

Furthermore, as relates to multisectoral coordination with respect to the domestic financial solutions that the project will help to implement (e.g., biodiversity credits, wildlife bonds, or landscape financing) under Output 2.2.1, diverse, gender-balanced Implementation Task Teams (ITT) will be established, comprising members from the CAG and other relevant stakeholders.

The ITTs will be supported by specialized consultants (e.g., legal advisors, financial structuring experts, community engagement specialists) contracted by the Project Management Unit (PMU) under MEFT, housed within the GPTF. who will drive the design and implementation of the selected financial solutions. ITTs will develop and execute detailed implementation plans for each selected finance solution.

In direct response to the review comment highlighting a perceived gap in multisectoral coordination, the following key changes have been made:

Explicitly broadening the Project Steering Committee (PSC) mandate: The project's "Institutional Arrangement and Coordination with Ongoing Initiatives and Project" section details the establishment of a **joint Project Steering Committee (PSC)**. This PSC will represent both this GEF project and the KfW/MEFT Sustainable Financing Project (SFP), and potentially other aligned projects such as UNDP?s BIOFIN. The PSC, chaired by MEFT, will serve as the primary strategic and decision-making body, responsible for "Coordinating different donor interventions and ensuring synergies between various Namibian trust funds" and "Facilitating the dissemination of lessons learned from the project implementation". Its composition includes representatives from MEFT, KfW, NACSO, GPTF, and the Conservancies Alliance, with invited participants from EIF, NPC, and UNDP (as an observer). ?

The PSC will formally invite representatives from key private sector entities and NGOs as observers or co-opted members for relevant discussions. This ensures that their perspectives on sustainable finance mechanisms and landscape-level conservation, for example, are directly considered at the strategic decision-making level. See CEO ER and PSC ToR.

Enhancing communication in the Stakeholder Engagement Plan: The SEP is updated to reflect how various stakeholder groups (government, private sector, NGOs) will be engaged through these broadened multisectoral platforms, ensuring their expertise and investment opportunities are integrated. Allocating budget for multisectoral coordination facilitation:

Budget simplification. The budget notes for "Professional Fees" are amended to include specific funding for external consultants or facilitators to support the establishment and ongoing operation of these multisectoral coordination platforms. This ensures that the mechanisms for cross-sectoral engagement are adequately resourced. These changes demonstrate a robust and explicit strategy for multisectoral coordination, ensuring that the project effectively gathers and integrates input from all relevant sectors, including private and non-governmental stakeholders, to achieve its objectives.

These structures, particularly the CAG and the joint PSC, are specifically designed to overcome the barrier of insufficient multisectoral coordination. They provide formal and active platforms for public, private, and non-governmental stakeholders to engage, align efforts, and build effective partnerships, ensuring that Namibia is united behind a financially sustainable park network. The inclusion of diverse stakeholders, including private sector entities like NWR and civil society organizations like NACSO, directly addresses the need for a platform to gather these different sectors, fostering a collaborative environment essential for project success and long-term sustainability.

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project

a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?

b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?
c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).

Secretariat comment at CEO Endorsement Request

September 03, 2025

Addressed.

July 07, 2025

WWF-US is the GEF Agency; the MEFT is the main executing partner. All partners are members of the Project steering committee.

There is no proposed agency execution support.

- We are surprised to see only consultants in the budget and no partnerships with national or local entities. Please, justify.

- Coordination and cooperation will take place with the GEF7 Enduring Earth Project and UNDP/GEF projects, as the GWP project.

Agency Response

WWF GEF Agency Response 7.28.2025:

Thank you for your comments.

We would like to clarify that while the budget detail presented primarily categorizes expenditures by input type (e.g., consultants, staff, travel), it implicitly funds and enables significant partnerships with national and local entities. This has now been simplified in the budget under ?professional services? (see budget comment below).

The Ministry of Environment, Forestry and Tourism (MEFT) is the Lead Executing Agency and houses the Project Management Unit (PMU). The PMU staff, whose costs are reflected in the budget, will work directly with and through various national government entities.

Additionally, the role of overlapping and adjacent private nature reserves has been recognized, particularly in the context of a landscape-level conservation approach. These reserves stand to benefit from ? and contribute to ? integrated conservation efforts at the national scale. These clarifications and related amendments are reflected in Figure 2 of the CEO ER as well as highlighted amendments in the SEP.

Justification for Partnerships with National or Local Entities (Addressing "only consultants in the budget"): The perception of "only consultants in the budget" is understood and has been addressed under the professional services categorisation (See also response below on the project

budget). However, it is useful to stress that the project is fundamentally built upon robust partnerships with a wide array of national and local entities, which are integral to its design and implementation, and whose roles are clearly defined in the budget notes and will be further refined at the hiring stage in ToRs. Given the specialized nature of the subject matter of the project, the budget includes provisions for consultants to provide specialized technical expertise where needed, but these consultants work *with* and *through* established national and local structures, not in isolation. It is expected that a sizeable portion of this will be international even if national entities and individual professionals are sought first because of their bespoke nature in some cases.

The project explicitly identifies and collaborates with numerous national and local entities:

Government Ministries and Directorates: Beyond MEFT, the project directly engages the Directorate of Wildlife and National Parks (DWNP), Directorate of Forestry (DoF), Directorate of Scientific Services, Directorate of Administration, Finance and Human Resources, Directorate of Planning and Technical Services, and the Ministry of Finance and Public Enterprises. These are not merely "consulted" but are direct implementing partners through the PMC and specialist task teams and beneficiaries of the project?s capacity building.

Public Enterprises: The **Game Product Trust Fund (GPTF)** is a central national entity and the ultimate beneficiary of institutional strengthening and capitalization efforts under Components 1 and 2.

Local Community Groups and Indigenous Peoples: The project directly engages and supports **Traditional Authorities**, **Constituency Offices**, **Communal Conservancies**, and **Community Forests**. These are the primary local actors responsible for land administration, natural resource management, and community-based conservation. Over the medium- to long-term, the project will improve livelihoods for approximately 770,000 people living in or adjacent to PAs, including those in 29 communal conservancies, who are direct beneficiaries of future GPTF funds. The Indigenous Peoples Planning Framework (IPPF) and Process Framework (PF) further detail engagement with Indigenous Peoples and local communities. ? These relationships will be developed under component 2 as the GPTF is capitalised and will be involved in the identification of future areas of support.

Civil Society Organizations: Key national NGOs such as **Namibia Nature Foundation (NNF)** and the **Namibian Association of Community-Based Natural Resources Management Support Organisations (NACSO)** are members of the PSC (thus with an ability to advise steer and collaborate) and play significant roles in supporting community-based natural resource management. The Community Conservation Fund of Namibia (CCFN) is also a key PSC partner, thus with an ability to advise steer and collaborate. ?

Professionals, whether firms or individuals (sometimes called consultants, (national and international if needed) are engaged to provide specific, time-bound technical expertise (e.g., economic valuation, financial structuring, legal advice, specialized training) that may not be readily available internally within MEFT or its partners, or to accelerate specific outputs. For instance, a technical consultant with expertise in forestry, GIS, and economic valuation will lead capacity building for the Directorate of Forestry. Similarly, legal and financial experts will guide GPTF's institutional enhancement. These consultants work *with* and *to strengthen the capacity of* the national and local entities, ensuring knowledge transfer and sustainable impact, as will be prescribed in detailed terms of reference. The budget notes explicitly detail the rationale for professional fees, international consultants, and local consultants, outlining their roles in supporting various project activities. ?However, the composition of these has been changed to make the emphasis on local professionals clearer (budget notes).

The project explicitly acknowledges and details its reliance on a broad network of national and local partners, rather than solely on external consultants. The strategic engagement of consultants is to augment, not replace, the capacities of these vital national and local entities. This collaborative framework, coupled with robust coordination with ongoing and past GEF initiatives, ensures a synergistic approach that maximizes impact and fosters long-term sustainability.

5.3 Core indicators

a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?

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

Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

October 29, 2025

METT scores are available for 20 protected areas representing more than 13.9 million ha. Only three METT scores are missing for small protected areas (100ha, 50, 11.17). We can accept the point is addressed with the understanding that the GEF Agency will come back by the end of the year with the missing METT scores.

Addressed.

September 03, 2025

- In contradiction with the response below, METT scores are available for 10 protected areas among the 23 targeted. 13 are missing, including 5 national parks. Please complete and correct both in the portal and the project document.

- Also 4 WDPA IDs are missing for the listed protected areas. Please, complete of these IDs exist.

July 07, 2025

- Core Indicator 1.2 (PA under improved management effectiveness): the list of protected areas is available. METT scores are available for a number of protected areas, not all. Please, explain and complete.

- CI 11: The number of beneficiaries seems very low (199 female, 256 male) for a total of 455 beneficiaries. Please, clarify.

Agency Response

WWF-GEF Agency Response (11.19.2025):

Thank you. The missing METT scores will be provided as soon as received from the lead EA. These are expected, as previously noted, by the end of the calendar year.

WWF-GEF Agency (10.17.2025):

We regret the oversight that informed the initial response to the comment regarding the absent METT baseline scores. **Of the listed target areas for which scores were missing, METT scores have now been added in the core indicator worksheet and the portal for** the 2 NPs for which data is currently available (Mangetti and Khaudum) following a scoring exercise completed in 2025 (after first submission).

For the remaining 8, baseline METT scores are unavailable for 3 (Popa Falls, South West Nature Park (formerly Botanical Garden) and Gross Barmen), and are outdated for 5 (Waterberg, Hardap, Cape Cross, Daan Viljoen, and Von Bach). MEFT will oversee a scoring exercise in October 2025, and METT scores for these eight areas will be available by the end of 2025, at which time the core indicator worksheet and relevant portal entries will be updated accordingly.

Regarding the missing WDPA IDs: The WDPA IDs for Zambezi, Kanovlei and Hamweyi State Forest Reserves are now included. The South West Nature Reserve (previously known as the National Botanical Research Institute) does not have an ID . The area was earmarked as a park in 1970, but a lack of funding resulted in its IUCN status never being formally secured. The MEFT will soon submit the project to ICUN/Protected Planet Database for formal recognition, following which an ID will be issued.

WWF GEF Agency Response 7.31.2025:

The project aims for a comprehensive improvement across the entire 13.9 million hectares of Namibia's state-run Protected Area Network. The project's strategy (Components 1 and 2) is designed to establish the foundational financial sustainability and institutional capacity necessary to elevate management effectiveness across the entire network. Therefore, the reported 13.9 million hectares reflect the intended scope of improved management, and future METT assessments (at project close) will capture the network-wide enhancements resulting from the project's interventions. We have clarified this in the text of Core Indicator 1.2 to emphasize the national scope and the strategic approach to achieving widespread management improvements. METT scores provided are for all the state PA system, not for private or community conservancy PAs as they are not the primary focus of the project.

For Core Indicator 11: "We appreciate the comment regarding the number of beneficiaries. The figure of 455 (256 men and 199 women) specifically refers to direct beneficiaries, which aligns with GEF's core indicator reporting requirements for individuals directly engaged in or receiving benefits from project activities. These include MEFT and GPTF staff, as well as representatives from local communities and Indigenous Peoples participating in specific project interventions (e.g., training, direct benefit-sharing mechanisms). We have further clarified that the project anticipates significantly broader indirect benefits for approximately 770,000 people living in or adjacent to Protected Areas. These indirect benefits will stem from improved PA management leading to increased income and diversified livelihood opportunities from enhanced nature-based tourism, sustainable nature-based value chains, and job creation.

5.4 Risks

a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?

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 assessed and rated and consistent with requirements set out in SD/PL/03?

Secretariat comment at CEO Endorsement Request

July 07, 2025

- There is a risk analysis with mitigation measures

- The overall risk rating is "moderate", as confirmed in the Environmental and Social Management Framework.

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response
6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities
6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?

Secretariat comment at CEO Endorsement RequestYes

Agency Response
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 comment at CEO Endorsement RequestYes

Agency Response
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 comment at CEO Endorsement Request

July 07, 2025

Yes, the project is aligned to the Kunming-Montreal Global Biodiversity Framework and specifically its target 3 (ensuring that at least 30% of terrestrial, inland water, coastal, and marine areas are effectively conserved and managed by 2030).

Agency Response
7 D. Policy Requirements
7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement RequestYes

Agency Response
7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

September 03, 2025

Addressed,

July 07, 2025

- There is a document entitled "SAFEGUARDING THE FUTURE OF NAMIBIA?S PROTECTED NETWORK THROUGH FINANCING4FUTURE (NAM-GEF F6 SPA), GENDER IN CONSERVANCIES: A GLOBAL, AFRICAN, AND SADC PERSPECTIVE WITH A FOCUS ON NAMIBIA".

- Not sure if this document is the Gender Action Plan. Please, clarify.

- It seems that there is a missed opportunity to do more for women and gender equality in this project. The result framework completely ignores women and gender issues. To be corrected.

Agency Response

WWF GEF Agency Response 7.31.2025:

Addressing "Missed Opportunity" and "Results Framework Ignores Gender" Comments:

The review comment correctly identified that the document titled "Gender in Conservancies: A Global, African, and SADC Perspective with a Focus on Namibia" serves as the Gender Action Plan. We have clarified the title of this document to explicitly state that it is the Gender Action Plan. Furthermore, we acknowledge the feedback that there was a missed opportunity to more fully integrate gender equality into the project's results framework which has now been addressed through cross-referencing from the RF to the GAP (highlighted in the response). While the underlying Gender Action Plan (GAP) extensively proposes clear actions, the project results framework, as initially presented, did not explicitly reflect these commitments with gender-sensitive indicators. To address this, the project has made those results framework adjustments which are also reflected in an updated theory of change (new diagram attached and in the CEO ER). Additionally, please check the uploaded revised CEO ER document in the roadmap where the changes have been highlighted in yellow for easy review.

.

Moreover, the project's commitment to gender equality is systematically integrated into its design, implementation, and monitoring mechanisms, ensuring that women and marginalized groups are active participants and equitable beneficiaries throughout the project lifecycle as detailed below.

The Gender Action Plan (GAP) is uploaded as part of the project documentation. The document titled "SAFEGUARDING THE FUTURE OF NAMIBIA?S PROTECTED NETWORK THROUGH FINANCING4FUTURE (NAM-GEF F6 SPA), GENDER IN CONSERVANCIES: A GLOBAL, AFRICAN, AND SADC PERSPECTIVE WITH A FOCUS ON NAMIBIA"

contains the comprehensive **Gender Analysis Framework**, and it explicitly contains the **Gender Action Plan (GAP)** within its Section 9.0, starting on page 20. The analysis identified key gender differences in access to and control over natural resources, participation in decision-making, and access to financing opportunities, particularly affecting women and marginalized gender groups in target areas. These insights informed the development of specific project components.

For example:

Capacity-building activities include targeted support for women and underrepresented groups within government and community structures.

Financial mechanisms will be designed to ensure inclusive access and benefit-sharing, considering the needs and constraints of different gender groups.

Monitoring and evaluation frameworks will disaggregate data by gender and track gender-specific impacts, ensuring accountability to gender equity goals.

These measures are reflected in the design and description of Components 1?3 to ensure the project delivers equitable benefits and supports inclusive participation. Enhancements are found in yellow highlight in the CEO ER and RF and GAP.

The project has a robust and systematic approach to gender integration, ensuring it is a cross-cutting theme throughout the project's design and implementation.

Comprehensive Integration of Gender: The Gender Action Plan (GAP) is not a standalone addendum but is deeply embedded within the project's core structure. It outlines specific gender-sensitive actions, indicators, and targets for *every single outcome and output* across all three project components. This ensures that gender considerations are integrated into all facets of project implementation, from economic valuation to institutional reforms and financial mechanisms.

Examples of Gender Integration in Outputs and Outcomes:

Outcome 1.1 (Compelling Business Case): Output 1.1.1 ensures "gender-disaggregated data and analysis" in the economic valuation of Namibia's PAN, and Output 1.1.2 tailors communication materials for diverse audiences, including women and marginalized groups.

Outcome 1.2 (Improved Government Capacity): Output 1.2.1 includes a "gender-balanced comprehensive training program" for Directorate of Forestry staff and a "gender-sensitive economic valuation of forest resources". It also outlines the development of "A Gender-Responsive Strategy for Tackling Sexual Harassment, Childcare, and Workplace Inequities in MEFT".

Outcome 1.3 (GPTF Institutional Capacity): Output 1.3.1 ensures "explicit integration of gender equity in governance and financial management practices" of the GPTF, with gender-responsive training. Output 1.3.2 ensures the budget allocation system "explicitly incorporates and ensures gender equity in fund allocation" and conducts financial gap analysis considering "gender-differentiated needs".

Outcome 1.4 (Improved Systems for Sustainable Finance): Output 1.4.1 mandates establishing a "gender-balanced Collaboration Advisory Group (CAG)".

Outcome 1.5 (Diverse Financial Solutions): Output 1.5.1 ensures "gender equality considerations" are integrated into strategic feasibility assessments. Output 1.5.2 requires a Biodiversity Offset Policy Framework that ensures "benefit-sharing mechanisms, including gender-sensitive aspects".

Outcome 2.1 (Enhanced GPTF Revenue): Output 2.1.1 ensures "at least 40% female representation in the reform team and sufficient gender-responsive training for staff". Output 2.1.2 engages women and marginalized groups in consultations for the new fee structure and assesses how reinvested revenues can support "gender-sensitive PAN management".

Outcome 2.2 (New Sustainable Finance Solutions): Output 2.2.1 ensures "gender expertise and at least 40% female representation in relevant teams" for implementing new financial solutions. Output 2.2.2 develops M&E systems with "gender-specific indicators and disaggregated data".

Outcome 2.3 (GPTF Capitalization): Output 2.3.1 ensures GPTF capitalization considers "gender equity" and fundraises for "gender-specific activities". Output 2.3.2 ensures asset managers are appointed through a "gender-equitable process" and the investment strategy is "gender-responsive". Output 2.3.3 outlines an operational manual that integrates "gender-specific initiatives".

Outcome 3.1 (Knowledge Management & M&E): Output 3.1.1 ensures "integration of gender-specific indicators and data in all project M&E activities". Output 3.1.2 ensures "inclusive participation and gender disaggregation in annual reflection workshops" and develops knowledge products that "integrate gender considerations".

Gender-Sensitive Indicators in Results Framework: The CEO Endorsement Request explicitly confirms that the project's results framework or logical framework includes gender-sensitive indicators. The GAP provides a detailed table of these indicators and their targets. ?

Dedicated Gender Specialist and Budget: A full-time Gender, Environmental and Social (E&S) and Social Inclusion Specialist is a key position within the Project Management Unit (PMU), dedicating 100% of their time to ensuring the overall implementation of the ESMF, Gender Action Plan (GAP), and Stakeholder Engagement Plan (SEP), and providing technical support for gender integration across all safeguards processes and project components. Specific budget lines are allocated for gender-specific activities, workshops, strategy development, and expert consultants. ?

The project's commitment to gender equality is systematically integrated into its design, implementation, and monitoring mechanisms, ensuring that women and marginalized groups are active participants and equitable beneficiaries throughout the project lifecycle.

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

October 29, 2025

See the Stakeholder Engagement Plan: p8, 9, 10, and tables p27, 28, and 29 on NGO/local and international CSO and p49 on private nature reserves.

Addressed.

September 03, 2025

Quality control: On stakeholder engagement: It is well noted that the SEP has been updated to reflect how various stakeholder groups (government, private sector, NGOs). However, while the SEP clearly identifies Local CSO and CBOs, including IP, women, and youth groups as important stakeholders these are not named in the SEP. Please ask agency to name specific groups and organizations to be engaged and consulted in project implementation as well as their specific roles related to project components and outputs.

July 07, 2025

Yes

We are surprised to not see partners, NGOs, private companies,..., empowered through this project. Would it not be an option for better sustainability?

Please, clarify.

Agency Response

WWF-GEF Agency (10.17.2025):

Thank you for this comment. The list of stakeholders in the SEP (Section 5) has been updated and now explicitly names actors within Namibia?s civil society networks that are directly relevant to this project, including NGOs, CBOs, youth and women?s groups, and Indigenous Peoples? representatives.

Section 5 of the SEP now describes how these CSOs will be engaged, the frequency of engagement, their prospective interest in the project, and roles related to project components.

All changes to the SEP appear in yellow highlight. For ease of reference we have also included a listing of stakeholders in the body of the CER after the description of baseline initiatives.

WWF GEF Agency Response 7.31.2025:

Clarification on Empowerment of Partners, NGOs, and Private Companies for Better Sustainability:

We appreciate the valuable comment regarding the empowerment of partners, NGOs, and private companies. We agree that fostering stronger capabilities and direct involvement among project stakeholders is crucial for supporting the project?s long-term sustainability.

The project design explicitly and systematically integrates the empowerment of partners, NGOs, and private companies, recognizing that their active involvement and strengthened capacities are crucial for long-term sustainability of the project?s outcomes. The project's approach goes beyond mere consultation to foster genuine collaboration, capacity enhancement, and shared ownership.

Direct Capacity Enhancement for Government and Public Entities:

MEFT and Directorates: The project aims to improve the institutional capacities of various MEFT directorates (e.g., Directorate of Forestry) to make informed decisions and implement effective policies for sustainable natural resource management (Outcome 1.2). This includes gender-

balanced comprehensive training programs in forest inventory techniques, data analysis, economic valuation, and sustainable finance. ?

Game Product Trust Fund (GPTF): A central focus is the significant empowerment of the GPTF. The project will enhance its institutional capacity to meet global Conservation Trust Fund (CTF) standards, strengthening its governance, financial/technical systems, and revenue mobilization/disbursement (Outcome 1.3). This involves revising its legal framework, establishing a multi-stakeholder governing board, and providing gender-responsive training to staff and board members. The project also supports the implementation of institutional reforms for enhanced GPTF revenue generation (Output 2.1.1). ?

Namibia Wildlife Resorts (NWR): As a state-owned enterprise, NWR is included in the strategic review of the broader institutional landscape (Output 1.4.1) to identify reforms that can optimize income generation and management across the PAN, such as improving revenue generation from its facilities. ?

Active Role of NGOs and Civil Society Organizations (CSOs):

Partnership in Governance: NGOs and CSOs, such as the Namibian Association of Community-Based Natural Resources Management Support Organisations (NACSO) and the Community Conservation Fund of Namibia (CCFN), are identified as key stakeholders and are members of the Project Steering Committee (PSC). This direct involvement in the highest decision-making body ensures their voices are heard and their expertise contributes to the project?s strategic direction and oversight. ?

Leveraging Existing Initiatives: The project explicitly states it will leverage strong civil society partnerships, including WWF-Namibia and Namibia Nature Foundation, and learn from previous GEF investments in the country. This indicates a reliance on and strengthening of existing NGO capacities. ?

Community-Based Natural Resource Management (CBNRM): The project recognizes the vital role of community-based organizations (CBOs) like communal conservancies and community forests in managing natural resources. These CBOs are instrumental in mobilizing communities and coordinating consultation logistics.

Empowerment and Integration of the Private Sector: The private sector will play a number of roles in the project, as detailed below:

Financier and Investor: The private sector is seen as a crucial financier. The project aims to mobilize new investment through innovative financial mechanisms like biodiversity credits and wildlife bonds, which will entail actively engaging private sector entities, financial institutions, and investors. This directly empowers them as key actors in conservation finance. ?

Policy Development and Technical Expertise: Private sector stakeholders, including the Hospitality Association of Namibia (HAN), Tours and Safari Association of Namibia (TASA), PA Tourism Concessionaires, and the Chamber of Mines of Namibia, will provide input on policy development (e.g., Biodiversity Offset Policy Framework) and offer technical assistance in financial structuring and market analysis, e.g. through the CAG and ITTs. Their active participation in these processes empowers them to shape the enabling environment for sustainable finance. ?

Collaboration Advisory Group (CAG): The establishment of a gender-balanced CAG includes private sector representatives, ensuring their perspectives and capabilities are integrated into strategic reviews and the identification of sustainable financial solutions. ?

Contribution to Sustainability: The empowerment of these diverse partners, NGOs, and private companies is central to the project's long-term sustainability strategy. By strengthening their capacities, integrating them into governance structures, and fostering direct partnerships, the project aims to:

Diversify Funding: Reduce reliance on unpredictable government and donor funding by building a resilient and diversified funding base for PAN management, with private sector and enhanced national funds playing a larger role. ?

Institutionalize Best Practices: Ensure that enhanced financial management systems, governance standards (e.g., CTF standards for GPTF), and adaptive management approaches are embedded within national institutions, ensuring their continuity beyond the project lifespan.?

Foster Shared Ownership: Encourage a broad coalition of stakeholders to invest in and benefit from conservation, creating a collective incentive for sustained effort and improved outcomes. ?

Replicate and Scale: Enable the replication and broader adoption of successful pilot initiatives in revenue generation or efficient resource allocation across other protected areas, leveraging the strengthened capacities of partners. ?

The project's design strategically targets and empowers partners, NGOs, and private companies as active participants, beneficiaries of capacity building, and contributors to sustainable financing mechanisms, which is fundamental to ensuring the long-term viability and impact of conservation efforts in Namibia.

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request Yes

Agency Response

8 Annexes

Annex A: Financing Tables

8.1 GEF Financing Table and Focal Area Elements: 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 comment at CEO Endorsement Request Yes

Agency Response

Focal Area allocation?

Secretariat comment at CEO Endorsement Request Yes

Agency Response

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement Request NA

Agency Response

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement RequestNA

Agency Response
SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat comment at CEO Endorsement RequestNA

Agency Response
Focal Area Set Aside?

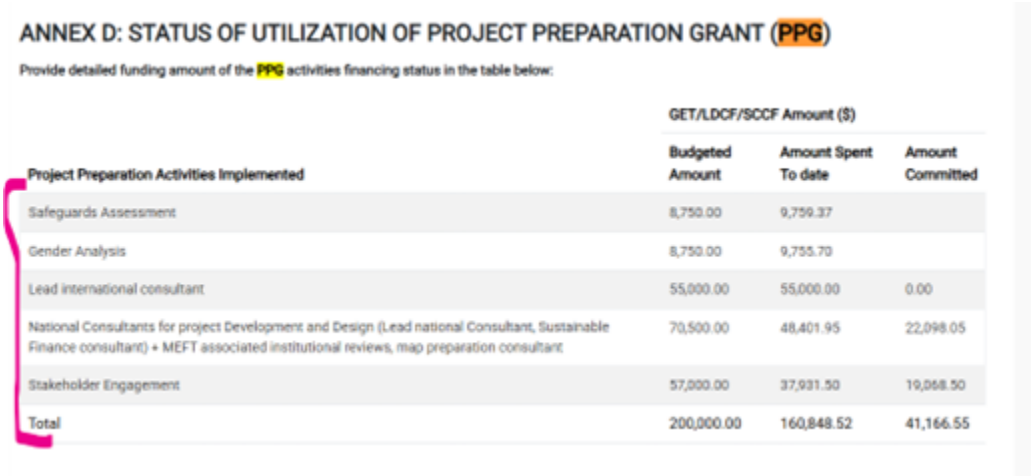
Secretariat comment at CEO Endorsement RequestNA

Agency Response
8.2 Project Preparation Grant (PPG)
a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement Request

October 29, 2025

Addressed. see table below.



ANNEX D: STATUS OF UTILIZATION OF PROJECT PREPARATION GRANT (PPG)

Provide detailed funding amount of the PPG activities financing status in the table below:

	GET/LDCF/SCCF Amount ($)		
Project Preparation Activities Implemented	Budgeted Amount	Amount Spent To date	Amount Committed
Safeguards Assessment	8,750.00	9,759.37	
Gender Analysis	8,750.00	9,755.70	
Lead international consultant	55,000.00	55,000.00	0.00
National Consultants for project Development and Design (Lead national Consultant, Sustainable Finance consultant) + MEFT associated institutional reviews, map preparation consultant	70,500.00	48,401.95	22,098.05
Stakeholder Engagement	57,000.00	37,931.50	19,068.50
Total	200,000.00	160,848.52	41,166.55

September 3, 2025

Control Quality: Please request the agency to list the activities implemented during the PPG phase to better assess the validity of each. These items require more details to be validated: ?Project Design?, to ensure does not fall into project start-up costs.

Agency Response
8.3 Source of Funds
Does the sources of funds table match with the amounts in the OFP's LOE?
Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement Request Yes

Agency Response

8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?
e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement Request

October 29, 2025

Addressed.

September 3, 2025

Control quality: Public investment and Grant are investment mobilized normally. Please request the agency to revise where they are classified as ?recurrent expenditures? to ?investment mobilized?.

Agency Response

WWF-GEF Agency Response (10.17.2025):

The CER Table describing ?Confirmed Co-financing for the project, by name and type? has been revised to address this comment. The Public Investment cofinancing from the MEFT has been recategorized as ?Investment Mobilized.? Likewise, the ?Public Investment? cofinancing from the GPTF has been recategorized as ?Investment Mobilized.? New co-financing letters from the MEFT and GPTF reflecting this change have been uploaded.

Annex B: Endorsements
8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:
Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?

Secretariat comment at CEO Endorsement Request Addressed at PIF stage

Agency Response

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

Secretariat comment at CEO Endorsement Request Addressed at PIF stage

Agency Response

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

Secretariat comment at CEO Endorsement RequestAddressed at PIF stage

Agency Response

Annex C: Project Results Framework
8.6 a) Have the GEF core indicators been included?
b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of total project financing (too high? Too low?)
c) Are all relevant indicators sex disaggregated?
d) Is the Project Results Framework included in the Project Document pasted in the Template?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Annex E: Project map and coordinates
8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Annex G: GEF Budget template
8.8 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?
b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?
c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement Request

November 20, 2025

Addressed.

October 29, 2025

Thanks for the modifications.

- We may still be surprised with the costs of some meetings, from 10,000 to 40,000 USD, for more than 440,000 US (including some trainings though).

- The costs of the project manager is financed half on the technical components and half on pmc. We suggest revising the terms of reference to better highlight the technical role related to the different components or increase the part covered by pmc. If the TOR clearly states a division of 65/35 between managerial and technical role, it should be reflected in the budget table.

Salary and benefits / Staff costs									MEFT
	Project Manager	34	65,000	56,875	8,125		130,000	260,000	MEFT

- Additionally, a ?Communications Specialist? is being charged to the M&E component. The M&E budget should be reserve the monitoring and evaluation activities. Please request the agency to correctly allocate these funds.

	Communications Specialist	37			60,000	45,000		105,000	MEFT

September 03, 2025

Quality Control:

- We kindly suggest the agency to use the template provided in the Guidelines on the Project Cycle.

- The budget is missing the stand-alone M&E component.

Expenditure Category	Detailed Description	Budget Notes	TOTAL COMP. 1	TOTAL COMP. 2	TOTAL COMP. 3	PMC	TOTAL PROJECT COSTS (USD)

- Agree with the PM comments on the ?Professional Fees? item. Please ask the Agency to present a budget with individualized items (activities / positions / expenditures), with concise shorter information, to assess the validity of each item. As presented, it looks like the cost of personnel amounts up to 62% of the GEF Financing (hint: what is explained in footnote [3], must be translated into individual positions / activities / expenditures).

Professional Fees	Fees for specialized external consultants to provide technical expertise, conduct studies, lead capacity building, and support various project activities, including safeguarding protocols.	[3]	1,265,000	1,687,528	160,000	190,000	3,302,528
External Fees (Legal, Structuring)	Specific legal and financial structuring fees required for detailed policy or financial solution development. These costs are anticipated to be recovered from specific activities.	[5]	-	150,000	-		150,000
Total Contractual Services - Company			**1,265,000**	**1,837,528**	**160,000**	**190,000**	**3,262,528**
	Project Manager		-	-	70,000	130,000	
	Gender and Social Inclusion Specialist		44,118	51,471	14,706		110,294
	Communications Specialist				120,000		120,000
	Finance and Administration Officer		-	-	-	100,000	100,000
Total Staff Costs (Salary & benefits/Staffing costs)			**44,118**	**51,471**	**204,706**	**230,000**	**530,294**

Technical Review:

- Thanks for the revised budget. However the last column (responsible entity for execution) stayed empty. Please, correct.

- The use of the word "fees" is unfortunate in the GEF context, as it refers to a part of the GEF grant. We suggest finding another word.

- Moreoever this new notion of "professional fees" does not help for the transparency of the budget, as for now, 57% of the project budget is on this line, without any mention of an executing partner, without making the distinction between international and national consultants and national partners. We invite you to get closer to WWF-US's GEF coordination unit to propose an acceptable budget with usual items and a minimum of information that allows us to check the proportion of international, national consultants, and national partners. Please, revise.

July 7, 2025

Budget

- Please, clarify and justify the amount of USD 1,676,821 for external consultants for a broad range of support (technical expertise, conduct studies, lead capacity building, support various project activities, including safeguarding protocols).

- Please, clarify the budget of USD 845,000 for international consultants for relatively broad and vague activities: ?technical knowledge?, ?guidance?, ?training??

- For a GEF grant of USD 6,140,422, the share for consultant is too high and not acceptable: The different budget lines for consultants show a total of 1,676,821 +150,000 + 845,000 (international) + 536,000 (national consultants), or 43.5% only for international consultants and 8.7% for national consultants. Please, revise.

- This high share of international consultants may reflect a problem of strategies and sustainability. Please, clarify.

- The Project manager is covered by 65% by pmc and 35% by technical components. Please, reflect this breakdown in the terms of reference in being more explicit about the technical tasks.

Agency Response

WWF-GEF Agency Response (11.19.2025):

-Thank you for the comment. The Agency recognizes that the amount budgeted for trainings, workshops, and meetings ($442,000 out of a total project budget of $6,140,422 or ~7% of the project?s overall budget) appears to be high. After receiving this comment and reflecting on it, the GEF Agency and Lead Executing Agency nevertheless believe that the budget is suited to the delivery of the outcomes of the project. A number of key outputs will require multiple or recurring consultations with stakeholders both in Windhoek and at the PA site level, and have high associated costs (between $40 and $50k) as a result. Of note, these include: Outcome 1.1.1 (PA economic valuation); Outcome 1.5.1 (identification of sustainable finance mechanisms); Outcome 1.5.2 (development of biodiversity offsets framework)). The Agency and the lead EA recognize that the number of workshops could present administrative challenges / high transaction costs to the PMU. In annual work-planning the PMU will endeavour to rationalize the number of annual workshops / capitalize on synergies and thereby reduce costs as well as the administrative burden. ?

- Thank you for the comment. The terms of reference for the project manager role have been revised to highlight the PM?s technical contributions and accurately reflect the distribution of the project?s budget between PMC and other project components. The balance is now 50-50 (project management to technical / sustainable finance responsibilites).

-Thank you for the comment. We regret the error. The Agency has corrected the error by allocating the resources for this position to the project?s Knowledge Management component (Component 3). The funds have been retained in the M&E budget to cover the costs of annual reflection workshops. Room in the budget for the $45,000 cost of the communications staff has been found by reducing by approximately 10% the overall workshops and training budget.

WWF-GEF Agency Response (10.17.2025):

-Thank you for your comments. We confirm that we used WWF?s standard budget template which is aligned with and derived from the template provided in the referenced GEF guidelines. However, we mistakenly failed to include M&E as a stand-alone column in the budget, instead integrating it with component of the project. We have corrected the error.

- Thank you for the comment, we regret the oversight. The budget has been adjusted so that M&E has its own, standalone column in the budget, just as PMC does. The ?Project Description Overview? table in the CER has been updated accordingly.

-The budget has been updated to include the information in the last column concerning the ?Executing Entity? for each entry. We regret the oversight.

-Thank you for the comment. We have completed a wholesale revision of the project budget to align its format and presentation with the WWF GEF Agency?s usual approach, including individualized line items. This has resulted in substantive changes to the budget and small redistributions of funds across project components. We have eliminated the reference to ?professional fees.? Furthermore, we note that all consultancy expenses have been listed in the ?contractual services ? company,? category. The use of both local and international consultants is contemplated, with Namibian expertise being preferred by the lead Executing Agency. Where Namibian experts are not available, however, specialists from the South African Development Community will be sought in the first instance to help to boost regional expertise. External specialists will be asked to provide capacity building to Namibians in their teams.

With respect to the expected split between international and national consultants, the budget does not specify this. All things being equal, the lead executing agency prefers domestic / national consultants to international consultants, although significant expenditure on international consultants is expected given the specialized nature of the subject matter.

-We have aligned the figures in the CER Table with the budget.

WWF GEF Agency Response 7.31.2025:

Clarification on Budget

The budget has been revised for clarification following the review comments. The revised approach directly addresses the review comment by: Consolidating Consultant Categories: All external service provision is now categorized under "Professional Fees." This streamlines the budget presentation, avoiding the previous fragmentation into "Professional Fees," "International Consultants," and "Local Consultants." This change reflects that service provision, regardless of the nationality of the expert, is about acquiring specific professional skills and deliverables. Clarifying the Necessity of Specialized Expertise: The revised allocation firmly establishes a hierarchy in recruitment: **local professionals are prioritized**. International specialists will only be engaged when domestic expertise is demonstrably insufficient, and efforts will be made to pair them with local counterparts for knowledge

transfer and capacity building. This directly responds to the concern about the "high share of international consultants" and emphasizes sustainability by ensuring that expertise is embedded within Namibia. The total allocated amount ($3,057,821) now represents all external expertise required, which, while appearing substantial, is justified by the often lengthy, complex, specialized nature of the work required for systemic change and long-term financial sustainability of Namibia's Protected Area Network. See revised Budget and Budget Notes.

Clarifying Project Manager's Technical Role :

The explicit description of the Project Manager's ToR of technical tasks alongside management function provides justification for the allocation of 35% of their time to technical components, reinforcing that this is not solely for "Project Management Cost (PMC)" but includes direct technical contributions essential for project success and strategic alignment. This structure and explanation aim to provide a more coherent, transparent, and justified budget, demonstrating a strong commitment to local capacity building while ensuring access to the specialized expertise necessary for the project's ambitious objectives (see PM ToR in yellow highlight).

Annex H: NGI Relevant Annexes

8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.

b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.

c) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat comment at CEO Endorsement Request

NA

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

November 20, 2025

One point has not been addressed. Upon receipt of a revised version, the project will be recommended for CEO endorsement.

October 29, 2025

The project cannot be recommended yet. Please address the remaining comments above.

(Comments from the US, Germany, and CBD Secretariat have been addressed. See annex I).

September 03, 2025

The project cannot be recommended yet. Please address the remaining comments above.

We did not find the responses to the comments made by the United States, Germany, and CBD in the matrix of responses. Please, complete.

July 07, 2025

The project cannot be recommended. Please address the comments above before we sent it to PO for the quality control.

9.2 Additional Comments to be considered by the Agency during the inception and implementation phase

Secretariat comment at CEO Endorsement Request

9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	**7/7/2025**	**7/31/2025**
Additional Review (as necessary)	**9/3/2025**	**10/21/2025**
Additional Review (as necessary)	**10/29/2025**	**11/19/2025**
Additional Review (as necessary)	**11/20/2025**	**11/20/2025**
Additional Review (as necessary)	**11/21/2025**	