

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

**Review PIF 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   |
| 3/19/2024   |
| Review completed by PM  |
| 3/29/2024   |
| Program Manager   |
|   |
| Jean-Marc Sinnassamy  |

| Focal Area   |  |  |
|--------------|--|--|
| Biodiversity |  |  |
| 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 May 2, 2024

Addressed.

April 26, 2024

**Financing:** You did not interpretate our comment the right way. We did not ask to change the table "Sources of Funds for Country Allocation" that is correctly filled in. We asked to apply the flexibility mechanism by adjusting , the table ?Indicative Focal Area Elements? and include a single line with BD1.1. Do not hesitate to contact us if the comment is not clear to you or if you are facing further difficulties. Please, revise.





Financing

We take note that this project is financed by resources from BD, CCM, and LD allocations, as confirmed in the LoE and reflected in the table ?Sources of Funds for Country STAR Allocation.

However, as the proposed is a pure BD project, the table ?Indicative Focal Area Elements? is not filled the right way. We should read a single line with BD1.1. This is the way to apply the full flexibility mechanism. Please, revise.

General Project Information

- Please, fill in the following cells in the General Project Information, about the executing partner:

| <b>Executing Partner:</b> | Execut | ting | Partn | er: |
|---------------------------|--------|------|-------|-----|
|---------------------------|--------|------|-------|-----|

- In the letter of endorsement, we understand that the project will be executed by the Ministry of Environment, Forestry, and Tourism (MEFT).

- Please, check the Agency ID (MEFT?). It looks awkward and seems a typo. Please, correct.

Agency's Comments WWF GEF Agency Response:

May 1, 2024

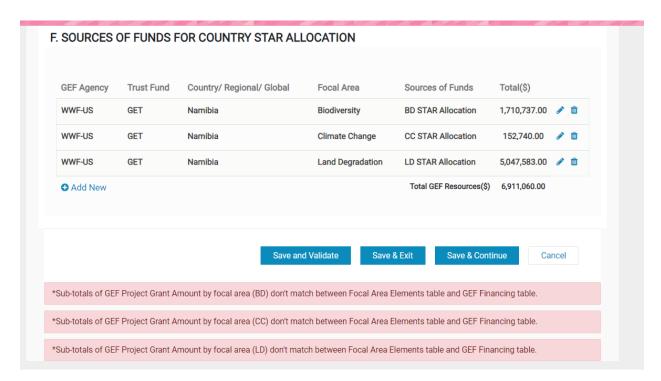
Noted. This has been addressed.

WWF GEF Agency Response:

April 23, 2024

<u>Financing</u>. As suggested, we reviewed the "Indicative Focal Area Elements" table to have only 1 line: BD 1-1. However, when doing this in the portal, we received an error saying that ?Subtotals of GEF Project Grant Amount by Focal Area don?t match between Focal Area Elements table and GEF Financing table? (see screenshot below) that didn?t allow us to do that change in the end.

<u>General Project Information</u>. The General Project information table in the portal has been updated to state that the MEFT is executing partner for the project. The GEF Agency ID has been updated to read: G0053.



#### 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 April 26, 2024

Addressed.

March 29, 2024

Please shorten the summary (current summary is more than double the indicated limit of 250 words). Please see comment on GEBs that are to be directly generated by the project and revise accordingly.

Agency's Comments

WWF GEF Agency Response:

April 23, 2024

The summary has been edited to fit the word limit. With respect to GEBs, as noted below, the focus of the project will be on achieving certain finance-related milestones that will take time

to translate into improved management on the ground, generating impact on the PAN effective management in the medium- to long-term, but that could not be claimed as directly generated by the project during its life time.

# **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 April 26, 2024

Addressed.

### March 29, 2024

1) Please simplify the log-frame by removing the examples and list of anticipated items to be considered under output 1.2.1, 1.31).

2) The entire project is built under the assumption that removing the financial barrier will be sufficient to ensure effective management of the existing PAN. Please confirm explicitly in the PIF that it is has been assessed that there is no need to improve the institutional arrangements, planning or operations of PAN management. Otherwise, please consider including a review and project activities to that end, as necessary.

In this respect, we note that output 1.3.1 includes ?review of the architecture of the institutions [?] to improve income generation *and management of* the PAN?, but the ?management? part is not covered in any of the items that would be included in the review. Please either include explicitly or remove ?and management of?.

3) The project plans to work on biodiversity offsets:

- Please confirm the project would only work on a policy framework that integrates the full mitigation hierarchy and follows best international practices, and that no GEF funding would go to compensate any particular infrastructure or development.
- Please clarify how the biodiversity offset policy framework the project would help developing would contribute to generate net, positive GEBs, when offsetting only brings about no net less loss. Is the scheme to require net gains? Please note that contributing the generation of net, positive biodiversity GEBs is required for GEF BD FA funding eligibility.
- Please also clarify how the biodiversity offset policy framework would generate revenues for PA management as planned under the project. Directly funding the

management of existing PAs would not seem compatible with the necessary additionality of offsetting measures to yield at least no net loss.

4) The project plans to create an endowment or sinking fund:

- Please clarify in the PIF whether part of the GEF grant would contribute to capitalizing the fund, and if so, how much. Please note that a minimum 1:1 ratio is required between GEF funding and co-financing for any contribution to the capitalization of such funds, that is for every dollar from the GEF used for fund capitalization, at least 1 dollar of co-finance needs to capitalize the fund.

- Please clarify the anticipated scope of activities to be funded and the ESS and fiduciary standards that would be followed.

Agency's Comments WWF GEF Agency Response:

April 23, 2024

1) Thanks for your suggestion. The examples and list of anticipated items to be considered under output 1.2.1, and output 1.3.1 have been removed from the Indicative Project Overview / Table B.

2) Thanks for your comment. There is, indeed, a need for institutional strengthening (of the MEFT and associated entities) for improving the PAN management. Therefore, an analysis will be completed during the PPG phase to identify what elements within the PAN management system (legal, planning, etc.) require strengthening / improvement. Based on the results of this analysis, specific activities will be included in the project strategy to respond to the identified needs (under Outcome 1.3.). This text has been added in the Project Description Section, under Outcome 1.3. Output 1.3.1 includes now explicitly an ?Options study to review the current architecture of the institutions (MEFT & associated entities) responsible for managing and operating the PAN to improve income generation and to ensure its effective management?

3) We confirm that no GEF funding would go to compensate any particular infrastructure or development. Regarding biodiversity offsets and how those differ/align with ecological compensation need to be clarified in a clear policy framework, at the moment nonexistent in Namibia. We have updated the text in the CEO ER, (in the Baseline and Project Incremental Value section - Table 5 on Financial Mechanism Opportunities, and in the Project Strategy section - under Output 1.2.1 description) that now indicates that during the PPG phase, a study will assess if this project will be able to develop a biodiversity offset policy framework (that can be approved by the government) that integrates the full mitigation hierarchy, following best international practices, and that helps to generate net, positive GEBs, and revenues for PA management. If this feasibility assessment concludes these principles can?t be accomplished, the development of a Biodiversity Offset Policy activity will be removed from the project strategy.

4) US\$ 2.8M of the GEF grant will capitalize the sinking or endowment fund. The guidance regarding the 1:1 ratio between GEF and partner co-financing is noted and will be met. Other expected donors to the fund's capitalization include KfW and the Environmental Investment Fund of Namibia (EIF) (The PIF has been updated in row 3.1 of TAble 6, under GEF Project Baseline and Incremental Value Section to address this comment). The transition or endowment fund will finance activities for the effective management of the PAN, and those activities will be identified and detailed during the PPG phase. They could include, amongst others: preparation of PA management plans, PA management infrastructure and equipment, PA signalization, monitoring and surveillance, etc. Depending on if a transition or an endowment fund is finally selected, on-the-ground implementation of activities would not start after the GEF project had finished, but, in any case, WWF GEF safeguards and fiduciary policies would apply to the entire Fund. This has been added in Row 3.1 of Table 6 in the PIF.
3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's Comments March 29, 2024

April 26, 2024

Addressed.

# March 29, 2024

- We take note of the Annex H on gender.

- We can understand it is not an easy task to integrate gender dimensions in a project on conservation finance. However, please, better include the need for gender equality and women empowerment.

- Please, find below some examples to better integrate gender perspectives:

• \* Ensuring that the policies and financial mechanisms and structures to be developed are gender-responsive (e.g., Outputs 1.1.1, 1.2.1, 1.2.2, relevant outputs in Outcomes 2.2 and 2.3);

• \* including women-led organizations / gender experts in decision-making (e.g. Outputs 1.1.1, 1.3.1 and 1.3.2.);

• \* in all stakeholder engagements, ensure women's and gender experts' representation.

• \* Under M&E, please ensure that gender-related results are monitored and reported on, and the GAP is budgeted.

•Please correct.

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Agency's Comments WWF GEF Agency Response:

April 23, 2024

The language of the following outputs has been adjusted (1.1.1, 1.2.1, 1.2.2, 1.3.1, 1.3.2, 2.2.1, 2.3.3) in the project logframe (Table B) and strategy sections to address this comment and ensure that gender equality and women's empowerment are considered in the development of policies and the operation of mechanisms supported by/developed under the project as well as in decision making with respect to these. The project will be designed to ensure that gender is a cross-cutting theme in the project and that gender dimensions are central to all stakeholder engagements. The Stakeholder Engagement section of the PIF notes that : "Throughout the life of the project, the stakeholder engagement plan will be implemented, and will represent one of the main mechanisms of addressing gender mainstreaming in the project. Stakeholder engagement will be conducted in a way to ensure participation of men and women, considering constraints for women?s participation, such as those related to their heavy domestic responsibilities, as well as any other marginalized groups such as the elderly, young or other minorities including, but not limited to, indigenous populations." Finally, gender-related indicators will be integrated in the project Results Framework in PPG stage. A gender analysis will be completed during the PPG phase, and will inform the development of gender-specific indicators. Towards the goal of all project activities being gender responsive, annual workplans and budget will reflect gender-related activities as per the GAP.

# 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 April 26, 2024

We understand you meant 37.8 million in cofinancing.

Addressed.

March 29, 2024

- The budget allocation to component 1 seems high and disproportionate for studies and policy work, when component 2 dedicated to implementation and setting up a Fund would seem to be more resource intensive. Please justify or revise.

- Cofinancing of 43.1 million is welcome, especially from so many grants considered as investment mobilized.

- The breakdown of cofinancing per component is relatively surprising and need some clarifications: \$16.4 million for the component 1 on the enabling environment, 23.2 million for the component 2 on the mobilization of financial resources, \$1.2 million form M&E. We would expect a higher cofinancing for the component 2. Could you please justify this breakdown and explain what the cofinancing will contribute?

Agency's Comments WWF GEF Agency Response:

April 23, 2024

In the Indicative Project Overview (Table B), the distribution of GEF funding and cofinancing across the two components has been adjusted to emphasize implementation and Fund set up, with Component 1 decreasing to 1,807,741 (~30% of resources available under Components 1&2) and Component 2 increasing to \$3,841,449 (~70% of resources available under Components 1&2). During PPG, a detailed budget will be prepared, based on the PPG situation analysis, stakeholder consultations, on the ground assessments and detailed project strategy, and a more detailed assessment of the baseline and co-finance contributions will allow for a more exact distribution of the cofinance per component. Co-finance sources have been reassessed, and adjusted from 43.1MUSD to a total of 378MUSD because some of the originally considered were indicative sources. We have indicated only confirmed sources at this time. Those co-finance sources include public funds supporting the PAN operation, and donor projects supporting the management and sustainable finance of the PAN, such as the MEFT/KfW ?Sustainable Financing Project? (SFP) which will be dovetailed with this GEF project.

# 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 April 26, 2024

Addressed.

# March 29, 2024

1) While we understand that their management is under the responsibility of different institutions, please clarify why resource mobilization for and financial sustainability of marine protected areas is entirely excluded from the scope of this project, especially as Namibia, with 1.7% of its EEZ currently under protection, may be considering expanding MPA coverage in its plans to achieve KMGBF Target 3.

2) Please see question on barriers related to governance, planning or operations of the PAN beyond funding and revise as necessary.

Agency's Comments WWF GEF Agency Response:

April 23, 2024

1) Given the available GEF 8 project funding, the opportunity of complementing KfW/MEFT?s Sustainable Finance project, and the existence of other projects/initiatives that are already supporting in Namibia the expansion of the MPAs towards achieving KMGBF Target 3 , the MEFT decided to focus this GEF project only on the terrestrial component of the PAN, to ensure focus and achievement of significant impact. However, Project Component 1 enabling conditions (institutional strengthening, enhanced policies, new SFMs, reformed GPTF) will also indirectly benefit the marine protected areas. See clarification in Table 6 ?Status of Namibia PA?s?, under Global environment significance, problems, and barriers Section.

2) There is a need for strengthening the MEFT and associated entities to overcome barriers related to the PAN governance, planning and operations, beyond funding. During the PPG, an assessment will identify what elements within the PAN management system (legal, planning, etc.) require strengthening / improvement. Based on the results of this analysis, specific activities will be included in the project strategy to respond to the identified needs (under Outcome 1.3.). This text has been added in the Project Description Section, under Outcome 1.3. Output 1.3.1 includes now explicitly an ?Options study to review the current architecture of the institutions (MEFT & associated entities) responsible for managing and operating the PAN to improve income generation and to ensure its effective management?. Output 1.3.2 would then implement institutional reforms and capacity building to overcome the priority barriers identified.

#### 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 April 26, 2024

Addressed.

March 29, 2024

1) This PIF does not come in a vacuum. Several donors, as KFW, in complement of the GEF have financed the protected network development for years. See the GEF portfolio in the country with the WB, UNDP, and WWF-US for instance: #2942, #3737, #4669, #4729, #9426, #10244, #11014?). We would be pleased to see already at PIF level a brief summary of key lessons.

Please, pay a particular attention at

- GEF ID 4729: Strengthening the capacity of the protected area system to address new management challenges (Short title: Protected Area System Strengthening Project ? PASS), 2014-2018, UNDP and

- GEF ID 2492 Catalyzing Sustainability of Protected Area Systems: Strengthening the Protected Area Network (SPAN), 2006-2012, UNDP.

Please, complete.

2) Please, explain how the current proposal will be articulated with the GEF7 PFP (GEFID 11014).

More accurately, please justify in the PIF why it is proposed to keep the PAN funding outside of the scope of the on-going PFP process supported by GEF ID 11014, especially when the PIF mentions a ?PFP approach may work well for Sinking funds? and there would probably be economies of scale in joining efforts. In any case, please explain how the mechanisms and/or funds that will be established for conservancies through the Namibia for life PFP, which include several funds according to the PIF (Endowment for

extension services, socio-economic fund, Endowment for Conservation Performance Payments), would relate institutionally, coordinate with and complement the ones envisioned in this project for the PAN.

3) Please clarify how this project will coordinate and avoid duplication with the ongoing GEF project to develop the national biodiversity finance plan of Namibia, which notably includes a national biodiversity finance policy and institutional review, a national biodiversity expenditure review, a national assessment of the financing required to achieve the Global Biodiversity Framework targets and identifying the optimal mix of prioritized finance solutions for Namibia (see GEF ID 11054, Umbrella Programme to Support Development of Biodiversity Finance Plans, UNDP).

Agency's Comments WWF GEF Agency Response:

April 23, 2024

1) The referenced projects have been reviewed, paying particular attention to 4729 and 2492, and a brief summary of key lessons of these two projects and other relevant KfW investments has been included in Annex I ?Lessons Learned?. Those lessons learned will inform the detailed design of the project during the PPG phase.

2) With respect to how this project will be articulated with the GEF-7 PFP project (GEF ID: 11014), the following language has been added in the PIF Section "Coordination and Cooperation with Ongoing Initiatives and Projects." The GEF7 PFP development process is led by NACSO ? the Namibian Association of Community Based Natural Resource Management (CBNRM) Support Organisations (NACSO); MEFT; and WWF Namibia. The focus of the GEF-7-supported PFP is community conservancies. While NACSO coordinates closely with the MEFT, and the MEFT supports CBNRM, conservancies are self-governed, non-governmental initiatives. The GEF-7 support will ensure effective management and foster economic development by guaranteeing the effective delivery of key services by CBNRM support organizations (NACSO and member organizations, including NGOs/Government/the University of Namibia) and the local Conservancies. Covered extension services will be enumerated in an extension services plan. Extension services support will complement the operational budgets of conservancies, funded through tourism and hunting ventures. Financing for extension services would be channeled through a Fund Administrator (still TBD).

This is distinct from the support that would be provided under this project to the national system of protected areas. While there is no expected institutional relationship between the sinking/endowment funds to be created under this project and the GEF-7 PFP, Namibia?s state PAs share more than 70% of their boundaries with conservancies. The operation of the GEF-7 PFP in areas adjacent to national parks or forming part of corridors between parks, conservancies may enhance the viability of PAs, and provide

scope for coordination of effort with individual conservancies. The operation of two conservation trust funds presents opportunities for lessons and experience-sharing.

3) With respect to coordination with UNDP's BIOFIN project, the following language has been added in the section "Coordination and Cooperation with Ongoing Initiatives and Projects": While UNDP's BIOFIN project focuses on developing a national biodiversity finance plan, aligned to the new Namibia NBSAP, WWF?s GEF 8 project focuses on the on-the-ground implementation of sustainable finance mechanisms to ensure the sustainable finance of the terrestrial component of the PAN network. There are several synergies and complementarities between both projects (including BIOFIN's SFM proposals), and a coordination with BIOFIN's project team has been initiated to ensure synergies and avoid duplication. Coordination mechanisms between the two projects will be implemented during the project PPG and implementation phases, and some ideas already discussed include a joint collaborative steering mechanism to oversee both projects, a joint collaborative learning and sharing (L&S) mechanism, etc. During the PPG phase, WWF?s project will periodically update BIOFIN?s Steering Committee on the progress of the project design, and will ensure discussions and contributions from Biofin?s team to the project strategy, institutional arrangements, KM, learning mechanisms, to ensure alignment of both projects.

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 April 26, 2024

Addressed.

### March 29, 2024

 a- 1) Please see previous comments on the absence of interventions related to PAN management governance, institutional arrangement, planning and operations and address accordingly in the ToC, as additional interventions or as assumptions.

2) Please include assumptions underlying the ToC in the ToC diagram.

3) Please explain why what is described as ?landscape financing approach? is labelled as a ?new revenue generation financial mechanism?. As described, this landscape financing

approach would reduce the needs for funding to the PAN, but would not generate any revenue for PA management. Please explain and revise the formulation as necessary.

4) Please clarify the two sources of seed capital for the endowment fund.

5) Outcome 2.2: Please clarify in the PIF what is meant by ?a stable and escalation infrastructure grant from the Treasury?.

Agency's Comments WWF GEF Agency Response:

April 23, 2024

1) There is a need for strengthening institutional capacities towards an effective management of the PAN. Further assessments will be completed during the PPG phase to identify elements within the PA system (legal, planning, etc.) that require strengthening / improvement. Based on the results of this analysis, specific activities will be included to respond to the identified needs (under Outcome 1.3). Outcome 1.3. has been adjusted and now reads: ?Outcome 1.3 Improved institutional capacities (of the MEFT and associated entities) to source finances and to effectively manage the PAN?. Under this Outcome, Output 1.3.1. will review the current architecture of the institutions responsible for managing and operating the PAN to improve income generation and the effective management of the PA and Output 1.3.3., based on the results of Output 1.3.1, will implement priority reforms and capacity building to increase domestic resource mobilization and to improve the effective management of the PAN.

2) Assumptions have been included in the TOC diagram.

3) Thanks for your comment. We have clarified in Table 5 ?Project?s Potential Financial Mechanisms and Conservation Finance approaches?, Row 2.2, that the landscape financing approach is not a new revenue generation tool, but a Conservation Finance solution that will significantly reduce PA management costs. It is considered that this approach will improve management over areas of important biodiversity and wildlife corridors without MEFT having to allocate resources for their ongoing management. This functional landscapes approach will create a net saving in PA management costs because of enhanced cooperation amongst landscape components towards mutually agreed objectives, strengthening/reviving former wildlife movement corridors which enhance wildlife dispersal and prevent local overpopulation, improve collaborative management of human-wildlife conflict, cooperation in fire management, fence maintenance, management of problem animals etc.

4) It has been clarified that the two sources of seed capital would be EIF and KfW, with further investigation occurring during the detailed planning phase of the project. This has been addressed in the PIF in the Project Description Section, under Outcome 2.3, and in the Baseline and Project Incremental Value Section, in row 3.1 of Table 5 ?Project?s Potential Financial Mechanisms and Conservation Finance approaches?.

5) Thanks for this comment. This reference had an error and has been deleted from the PIF.

# 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 March 29, 2024

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 April 26, 2024

Addressed.

# March 29, 2024

- Please, clarify the selected partners for execution.

- Please remove all closed projects and all projects that will close before the start of this one from this section dedicated to coordination.

- All relevant lessons learnt from older projects should be reflected in other sections of the PIF.

- Please add the GEF-8 project ID 11054, Umbrella Programme to Support Development of Biodiversity Finance Plans, UNDP.

Agency's Comments WWF GEF Agency Response:

April 23, 2024

 The PIF now clarifies that the Lead Executing Agency of this project is the MEFT. Additional executing partners will be identified during the PPG phase.
 All closed projects and all projects that will close soon have been removed from the Coordination section.
 Annex I (uploaded as a separated supporting document) includes a summary of lessons learnt from older projects that have informed the design of the current PIF and will continue to inform the design of the project during the PPG phase.
 The GEF-8 project ID 11054, Umbrella Programme to Support Development of Biodiversity Finance Plans, UNDP, has been added.
 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 May 2, 2024

Point taken. We expect progress on this issue at inception and during implementation.

# April 26, 2024

Don't you think that you could try to reduce the difference between male and female beneficiaries? After all the changes made in the result framework to propose better gender responsive actions, proposing 28% of female benefiaries seem quite low. Please, revise and explain the strategy you will deploy to identify and include female beneficiaries. Please, correct and explain.

March 29, 2024

 As per guidelines, only direct project impacts are to be reporting on core indicators. In this current formulation, the project will not have any direct impact on biodiversity or PA management. Please thus remove all core indicator targets, except the target on core indicator 11, which is mandatory.

- Just for information, please note that the creation of a NP of 11 ha looks surprising, as well as the targets of 11.9 million ha under improved management. Carbon gains (CI 6) are not needed for a BD project.

- What we recommend is including a narrative (under the core indicator table) on the anticipated indirect GEBs stemming from the project.

- If the project is modified to incorporate activities that directly impact PA management effectiveness, please maintain a target on core indicator 1, explaining how project interventions are to directly improve PA management effectiveness as measured by the METT.

- Core indicator 11 is a mandatory indicator. Please indicate the number of people benefiting from GEF-financed investments.

Agency's Comments WWF GEF Agency Response:

May 1, 2024

The gender balance of the project's direct beneficiaries reflects the current composition of the MEFT staff and the realities of the sector in Namibia which is characterized by a relatively low percentage of women in the staffing of MEFT and protected area management teams. The project has not yet defined the sustainable finance mechanisms that it will implement. Once those SFMs have been selected this figure will be updated. The project will be implemented with a gender transformative lens and will prioritize the participation of women in all project activities to increase the number of women directly benefitting from it.

The language of the PIF has been updated in the Core Indicators section to include the following note.

"Note that this figure is based on actual number of female and male government staff that at this stage the project proposes to directly work with. During project development and implementation, the team will proactively aim to engage a higher proportion of women across all project activities with the goal of increasing the total number of beneficiaries, and the percentage of women beneficiaries."

WWF GEF Agency Response:

April 23, 2024

Thanks for your clarification. It is expected that impacts on the effective management of the PAN due to the project?s activities would occur only after the project has closed. Consequently, the core indicator targets have been removed (for core indicators 1.2 and 6). Only core indicator 11 remains, and now presents a reduced number of people directly benefiting from the GEF project. This indicator target has reduced from 5,500 to 700, because we are eliminated the number of beneficiaries from the on the ground implementation of PA management activities, that will occur after the project has finished. A narrative (under the core indicator table) describes the anticipated indirect and medium term GEBs stemming from the project.

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

Secretariat's CommentsNA

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 April 26, 2024

Addressed.

March 29, 2029

•Risks: In the Key Risk section, please consider moving the Moderate rating under the ?Environmental and Social? risk category to Low, in line with the ESS risk category which is already marked as Low. Doing so would be in line with the description of the

?Environmental and Social? risk category in Annex B of the GEF Risk Appetite document (GEF/C.66/13) stating that: ?The rating reported by project under this category is identical to the Overall Safeguards Risk rating provided at PIF, CEO Endorsement, MTR and TE stage.?

- Please, confirm you applied the new provisions from the recent Council Document on Risk Appetite (GEF/C.66/13).

- Basically, it means to have well articulated the assessment of risk and the identification of mitigation measures under each relevant risk category. Please, confirm.

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

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

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Agency's Comments WWF GEF Agency Response:

April 23, 2024

The entire Risk section has been redrafted and now aligns with the provisions of the new Council Document on Risk Appetite (GEF/C.66/13). We confirmed the rating provided reflects the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures. We confirm ES risks, impacts and management measures have been assessed and rated following the requirements set out in SD/PL/03. We note that the ES rating has been adjusted to "moderate," because the project will establish an endowment or sinking fund that will finance on the ground interventions that may present risks that should be proactively managed by following the protocols and procedures outlined in an ESMF. The safeguards prescreen has been uploaded to the portal.

### 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 March 29, 2024

The development of long-term financing mechanisms for protected area networks is welcome. There are huge opportunities for innovation and scaling up. There is a coherence with the PFP process. The project is perfectly aligned with the national policies.

# 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 May 2, 2024

Addressed.

# April 26, 2024

See our comment above. You tried to adjust the wrong table. There is a confusion between two tables: Sources of Funds for Country Star Allocation and Indicative Focal Area Elements. The first table is right. Please, modify the second table on Indicative Focal Area Elements.

# March 29, 2024

Yes, if the table on indicative focal areas is corrected.

Agency's Comments WWF GEF Agency Response:

May 1, 2024

Noted. This has been addressed.

April 23, 2024

As suggested, we reviewed the "Indicative Focal Area Elements" table to have only 1 line: BD 1-1. However, when doing this in the portal, we received an error saying that ?Subtotals of GEF Project Grant Amount by Focal Area don?t match between Focal

Yes

Area Elements table and GEF Financing table? (see screenshot) that didn?t allow us to do that change in the end.

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 CommentsYes

# Agency's Comments

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 April 26, 2024

Addressed

March 29, 2024

No

Please, identify among the 23 targets of the Kunming-Montreal Global Biodiversity Framework, those who are applicable to this project.

Agency's Comments WWF GEF Agency Response:

April 23, 2024

The project will contribute to Kunming-Montreal Global Biodiversity Framework Targets 3, 18 and 19. Those have been referenced in the PIF summary section.

## 7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's CommentsYes

Agency's Comments 7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided? Secretariat's CommentsYes (annex G)

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 CommentsYes

Agency's Comments Focal Area allocation?

Secretariat's Comments May 2, 2024

Addressed.

# April 26, 2024

Not addressed.

Please see our comment above: You need to adjust the right table on indicative focal area elements, not the table on Source of funds.

March 29, 2024

Please, see the comments above about the table on focal areas

Agency's Comments WWF GEF Agency Response:

May 1, 2024

Noted. This has been addressed.

April 23, 2024

As suggested, we reviewed the "Indicative Focal Area Elements" table to have only 1 line: BD 1-1. However, when doing this in the portal, we received an error saying that ?Subtotals of GEF Project Grant Amount by Focal Area don?t match between Focal Area Elements table and GEF Financing table? (see screenshot) that didn?t allow us to do that change in the end.

LDCF under the principle of equitable access?

Secretariat's CommentsNA

Agency's Comments SCCF A (SIDS)?

Secretariat's CommentsNA

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

Secretariat's CommentsNA

Agency's Comments Focal Area Set Aside?

Secretariat's CommentsNA

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 CommentsYes

Agency's Comments

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

Secretariat's CommentsYes

Agency's Comments Annex B: Endorsements

8.4 Has the project been endorsed by the country?s(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 March 29, 204

Yes

The Letter of Endorsement is signed by Mr. Teofilus Nghitila, GEF OFP since 6 September 2012.

# Agency's Comments

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

Secretariat's CommentsYes

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 CommentsYes

Agency's Comments

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

Secretariat's CommentsNA

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 CommentsNA

Agency's Comments

Annex D: Safeguards Screen and Rating

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

Secretariat's Comments April 26, 2024

Addressed.

March 29, 2024

Environmental and Social Safeguards: We note that the overall ESS risk of the program is classified as low. However, there is no ESS screening information in the PIF. 1) Please provide ESS screening information. Also, the environmental and social risk in the Key Risk section is moderate. 2) Please make these two environmental and social risks consistent and revise them.

Agency's Comments

WWF GEF Agency Response:

April 23, 2024

1) ESS screening information has been uploaded and inconsistencies between the Environmental and Social Safeguards and Risks section have been addressed. 2)The environmental and social risk in the Key Risk section is now Moderate.

Annex E: Rio Markers

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

Secretariat's Comments April 26, 2024

Addressed.

March 29, 2024

- Please, remove the Rio Marker on Climate Change Mitigation: there is no objective or outcome related to CCM.

Agency's Comments WWF GEF Agency Response:

April 23, 2024

The reference to the Rio Marker on Climate Change Mitigation has been adjusted in the PIF document from "Significant Objective - 1" to "No Contribution - 0"

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's CommentsYes

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 CommentsNA

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments May 2, 2024

The PIF is recommended for clearance and inclusion in the Work Programme.

April 26, 2024

The PIF cannot be recommended yet. Please, see the comments on the tables and the core indicator 11, related to gender issues.

March 29, 2029

The PIF offers a high quality and we are not seeing any major obstacle to a next recommendation for clearance if the GEF Agency can address the points raised in this review.

Agency's Comments GEF Agency Response:

May 1, 2024

Noted. The suggested changes have been made. Thank you.

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

# Secretariat's Comments

- Confirm cofinancing
- Confirm the aspects related to any biodiversity offset policy framework
- Confirm the strategy and options to reach female beneficiaries.
- Confirm the project implementation arrangements.

- At inception and during implementation, please, increase the importance of gender issues.

# Agency's Comments Review Dates

|                                  | <b>PIF Review</b> | Agency Response |
|----------------------------------|-------------------|-----------------|
| First Review                     | 3/29/2024         | 4/23/2024       |
| Additional Review (as necessary) | 4/26/2024         | 5/1/2024        |
| Additional Review (as necessary) | 5/2/2024          |                 |
| Additional Review (as necessary) |                   |                 |
| Additional Review (as necessary) |                   |                 |