Conservation of Biodiversity, its Sustainable Use, Fair and Equitable Sharing of Benefits in India (CONSERVE)

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID
11784
Countries
India
Project Name
Conservation of Biodiversity, its Sustainable Use, Fair and Equitable Sharing of Benefits in India (CONSERVE)
Agencies
UNDP, World Bank
Date received by PM
9/10/2025
Review completed by PM
4/6/2026
Program Manager
Benjamin Singer
Focal Area
Biodiversity
Project Type
GBFF

PIF

CEO

1. General Project Information

a) Is the Project Information table correctly filled, including specifying adequate executing partners?b) Are the project tags properly selected, i.e. any tag on 'support to IPLCs' or KMGBF target is justified given the project description.

Secretariat comment at CEO Endorsement Request2025/09/16 cleared

Agency Response

c) Are the Rio Markers for CCM, CCA, BD and LD correctly selected with corresponding CCM, CCA, BD and LD benefits made explicit in the project objective, log-frame and/or theory of change?

Secretariat comment at CEO Endorsement Request2025/09/16 cleared

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 and other key expected outcomes?

b) Does the summary capture the essence of the project?

Secretariat comment at CEO Endorsement Request

2025/09/16

1. The components and outputs are numbered in a confusing way. The components are numbered 1, 1, 3, 2, 3, 4 and the outputs are similarly mixed up (e.g., component 3 has an outcome 4 and an output 4.2). Please number all of these in order.

2025/11/10 Thank you, this is cleared.

Agency Response

17 October 2025

As advised, the numbering of Components, Outcomes, Outputs have been revised as follows:

Component No.	Revised CEO-ER
Component 1 Strengthening Biodiversity Governance	Outcome 1.1: Biodiversity management integrated into spatial planning & 195000 ha improved mgmt. Output 1.1.1: Mapping Output 1.1.2: Management models
	Outcome 1.2: MIS strengthened Output 1.2.1: MIS portal Output 1.2.2: Knowledge products Output 1.2.3: Capacity building
Component 2 Community-Level Conservation	Outcome 2.1: OECMs established (5,000 ha) Output 2.1.1: OECM management plans Output 2.1.2: OECM knowledge products
	Outcome 2.2: Innovative financing for OECMs ? Output 2.2.1: Additional financing instruments mobilised
Component 3 Innovative Financing for NBSAP	Outcome 3.1: Financial resources mobilized through updated finance plans ? Output 3.1.1: Finance plans
Component 4 Monitoring & Evaluation	Outcome 4.1: M&E system strengthened ? Output 4.1.1: Steering committee + MTR/TE

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) For multi-Trust Fund projects with GEFTF financing, are the GEFTFT Project Financing and Co-Financing contributions to PMC proportional?
e) Is the PMC equal to or below 10% (for projects with GEF project financing less than or equal to $2 million) or 5% (for projects above $2 million)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

2025/09/23 cleared

2025/11/10 The project description overview is confusing as it has two "component 1" and two "component 2". Please make sure that all of component 1 (outcomes 1.1 and 1.2) are subsumed under a single component 1, and that all of component 2 (outcomes 2.1 and 2.2) are subsumed under a single component 2. The headline "Component 1) (pasted below) should only appear once, and the same goes for the Component 2 headline.

Project Components

Component 1: Strengthening Biodiversity Governance for improved ecosystem management

Component Type	Trust Fund
Technical Assistance	GBFF
GEF Project Financing ($)	Co-financing ($)
3,369,925.00	17,484,264.00

Outcome:

Outcome 1.1: Biodiversity management integrated into the national and state spatial planning frameworks to accelerate implementation of the Global Biodiversity Framework (GBF).

Indicators:

An updated national map of key terrestrial biodiversity areas and ecosystems developed with three spatial plans for biodiversity and critical ecosystems mainstreamed into state's conservation plans.

195000 hectares of high biodiversity / critical ecosystems outside PAs in Nagaland, Tripura & Uttarakhand brought under improved management through implementation of innovative management models, which will benefit 25,000 people (with 50% women).

Output:

Output 1.1.1: Key biodiversity areas and terrestrial ecosystems are mapped spatially at the national and state levels, and mainstreamed into the national conservation planning and the state's conservation plans.

Output 1.1.2:

Innovative management models and strategies developed and implemented for conservation of high value biodiversity.

Component 1: Strengthening Biodiversity Governance for improved ecosystem management

Component Type	Trust Fund
Technical Assistance	GBFF
GEF Project Financing ($)	Co-financing ($)
1,986,308.00	10,305,610.00

Component 2 Advancing Tools for Strengthening Community-Level Biodiversity Conservation

Component Type	Trust Fund
Investment	GBFF
GEF Project Financing ($)	**Co-financing ($)**
4,002,550.00	20,807,005.00

Outcome:

Outcome 2.1: Enhanced biodiversity protection, management and monitoring (MRV) achieved through community co-management approaches in three states.

Indicators:

Five OECMs notified and brought under improved biodiversity and habitat management through community co-management mechanisms across 5,000 hectares.

At least 5,000 TPLC[1][2] members (50% women) engaged in OECM identification and management, with at least 2 knowledge products documenting their roles disseminated.

[1] In India, Tribal People are constitutionally recognized as Scheduled Tribes with distinct cultures, traditions, and governance. Local communities, often rural and dependent on natural resources, may not be tribal but play a key role in conservation and resource management.

Output:

Output 2.1.1:

Management plans developed for identifying, recognizing and managing OECMs.

Output 2.1.2: Knowledge products and lessons from OECM identification, establishment and management produced and disseminated to public.

Component 2 Advancing Tools for Strengthening Community-Level Biodiversity Conservation

Component Type	Trust Fund

2025/12/23 Thank you, this is cleared.

Agency Response
8 December 2025

As advised, the Project Description Overview has been revised in the CER-ER.

Project Outline
4. CHANGES COMPARED to PPG REQUEST
4.1 Are changes to the project design, including to elements put forward in the PPG request to meet GBFF selection criteria, been described and justified. And are they acceptable?

Secretariat comment at CEO Endorsement Request2025/09/23 cleared

Agency Response
5 B. 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 other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?
c) If this is a blended finance project under GBFF Action Area 4, is there a description of how the project and its financial structure are addressing financial barriers?

Secretariat comment at CEO Endorsement Request
2025/09/16

1. It is stated that "As primary rights-holders and stewards of biodiversity outside protected areas, TPLCs are at the core of the project?s strategy", but these TPLCs are invisible in the CEO ER. Who are they? The IPPF is enlightening in this regard and as a stand-alone document, the CEO ER would need to include a summary/snapshot of who the targeted TPLCs are: demographics and other key details, plus their relationship to the natural environment to the extent possible (livelihoods, land tenure etc.).

2. Please explain site selection using specific criteria and provide the table showing how the three selected states rank top. Criteria can be ecological, social, economic but can also include elements such as additionality (e.g., building on past projects). All three sites are located along international borders. Is this just a coincidence? Also, how does the presence of borders impact on biodiversity management in these states, if at all?

2025/11/10 Great. Very nice additions. Both points are cleared.

Agency Response
17 October 2025

1. The sub-section titled ?Tribal Peoples and Local Communities (TPLCs)? has been elaborated under *the Key Stakeholders* section (page 16-17) of the CEO-ER. The subsection provides a concise summary of who the TPLCs are across the three project states (Nagaland, Tripura, and Uttarakhand) covering their demographics, socio-economic characteristics, livelihood dependence on biodiversity, customary land-tenure systems, and participatory governance structures (Village Councils, Tribal Autonomous District Councils, Van Panchayats, Gram Sabhas, and BMCs). It

draws upon data and analysis from the Stakeholder Engagement Plan (Annex 10) and the Indigenous Peoples Planning Framework (Annex 8b). This addition explicitly links the TPLCs? stewardship role, cultural identity, and ecological dependence with the project?s inclusive implementation strategy, thereby addressing the GEF Secretariat?s request for visibility and contextualization of TPLCs within the CEO-ER.

2. Site selection is based on a detailed multi-criteria screening across 28 Indian states using ecological, socio-economic, institutional, and additionality-based parameters and considered biodiversity value, restoration needs as stated in the official communication, community dependence on natural resources, strength of local governance systems, policy and institutional readiness, and potential for synergy with ongoing initiatives (ELEMENT, SECURE Himalaya, BIOFIN). These parameters are also aligned with GBFF Targets 1, 2, 3, 9, 10, 14, 19, and 22.

Nagaland, Tripura, and Uttarakhand ranked highest on composite scores, representing three critical biogeographic zones (Indo-Burma, Eastern Himalaya, and Western Himalaya) where conservation of biodiversity outside protected areas is largely driven by local communities. The selection maximizes both ecological additionality and implementation feasibility. The location of the three states on the international boundary is coincidental.

Although all three states share international borders, this is coincidental and not a determining factor for their selection. Nevertheless, their border adjacency provides ecological advantages by enhancing habitat connectivity for migratory species and creating opportunities for transboundary cooperation. The project will leverage these linkages through targeted capacity development and knowledge exchange interventions to strengthen cross-border ecosystem management.

The rationale and comparative ranking of all 28 states are now reflected in the revised CEO ER (page 18-20) under *?Project Target Areas?*, supported by a comparative table aligned with GBFF targets.

6 B. Project Description
6.1 a) Is there a concise theory of change (a narrative and a diagram) 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 previous and ongoing investments (GEF and non-GEF), lessons and experiences in the country/region?
c) Are the project components (interventions and activities) described, proposed solutions, critical assumptions, and risks properly justified? Is there an indication of why the project approach has been selected over other 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 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)?
h) Are the relevant stakeholders (including women, IPLCs, private sector, CSOs) 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 descriptions?
j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communications adequately described?
k) Policy Coherence: Have any policies, regulations, or subsidies been identified that could counteract the intended project outcomes? How will that be addressed?
l) Transformation and/or innovation: Is the project going to be transformative or innovative? Are the specific levers of transformation identified and described? Does it explain scaling up opportunities?
m) For blended finance project only, is the financial structure adequately explained?

Secretariat comment at CEO Endorsement Request
2025/09/16

1. What is "spatial mapping"? Is it different from mapping? Please explain the difference or revise accordingly.

2. In the TOC diagram, the "problem" box seems incomplete. Please add missing words at the end or revise.

3. The TOC section mentioned 3 components and the diagram mentions 4. Adding to the confusion on the structure of the project is the fact that Component 1 seems to have two outcomes (1 and 2) which means that Component 2 leads to outcome 3 and Component 3 to outcome 4. This is a mere convention, but combined with the fact that sometimes there are 3, sometimes 4 and sometimes 5 components it is hard to follow the project structure. Maybe outcomes 1 and 2 can be re-labelled 1a and 1b? Also, please go through the CEO ER and ensure that the text consistently refers to the same number of components.

4. Component 1: I am unclear as to whether any activities under this component are to be carried out on the ground as there are only references to plans, coping of models, design, capacity building, learning visits, documentation, workshops, assessments, portals and institutional capacity. If indeed there are no ground activities, how can Component 1 achieve improved management of 200,000 ha?

5. Component 3:

a. This component aims to leverage $2m in additional financing but this is barely more than the budget of this component, which is underwhelming. Consider raising the ambition of leveraged financing (see also related comment on the results framework).

b. Component 3 (notably key deliverables 2 and 3 on designing and piloting new financial mechanisms) also remains surprisingly vague. One would have expected the PPG implementation stage to have identified 1, maximum 2 sources of innovative financing to be leveraged, but at this stage the phrasing seems to suggest all options are still on the table. Do you have any lead on which of the mechanisms listed might be most promising?

c. Please also explain the process and implications of integrating biodiversity financing into state budgetary processes. What does this involve? How does it change state budgets? How does it increase financing for biodiversity?

6. One of the project's strengths is that it works both at national and state levels, but I could not find how the two levels are connected. A clearer explanation of the articulation between the two levels would enhance the overall coherence of the project. On a related note, please consolidate in one place (e.g., a replication roadmap) how the chances of replication to other states will be maximized, in particular the list of activities built in to this effect. Or is the "replication toolkit" already playing this role? If so, please explain what the toolkit is.

2025/11/10

1. Thank you for this clarification. Please add this explanation as a footnote the first time the term appears.

2-3. Thank you. These points are cleared.

4. Thank you. With regards to the on-the-ground activities such as ecosystem restoration, invasive species control and rehabilitation of degraded forests and wetlands: I was trying to find in the budget whether these are costed. Do they correspond to the $900,000 budget line entitled, "Grant for implementation of 6 pilot sites"? How does this large figure break down? Will you be setting up an on-granting mechanism? (If so, you will need to present how the mechanism works: governance, financial flow chart, selection mechanism for allocating funds etc.).

5. a. Apologies, I am not sure I understood the reasoning provided for C3 outcome 2, now Outcome 2.2. Am I to understand that the $2m will be leveraged during the project lifetime as a result of implementing Outcome 2.2? With a budget of close to $11m (including co-financing), a leveraged finance aim of $2m is genuinely underwhelming. This would need to be revised.

b. Why were the financial mechanisms to be developed not identified during PPG phase? It is odd to find that at this stage, we are still at shortlist stage.

c. Thank you, this is cleared.

d. Why was the second outcome of C3 merged with C2? The earlier structure appeared clearer, with C2 focused on community-based conservation and C3 on finance. Now, financing is split across multiple components and C2 is 10 times larger in budget than C3.

6. Thank you. This is cleared.

2025/12/23

1. Thank you, cleared

4. Thank you very much for this explanation. Please include this in the CEO ER (or indicate where it has been inserted as I was unable to locate it).

5. a. Thank you for this explanation. In addition to the text already inserted in the CEO ER, I recommend you add all the remaining detail that you provided in your reply below. In particular, in order to justify investing $10.96m into activities that will "only" generate $2m during the project lifetime, it is important to state that your expectations are that these activities will ultimately be leveraging between $5m and $10m a year for biodiversity, as indicated in the results framework. You can specify that these are indicative figures and that they will depend on a number of factors. As project implementation progresses, please provide more refined estimates in your reports to the GEF Secretariat.

5.b & d. Thank you, these points are cleared.

2026.02.05 points 4 and 5a. I managed to locate where this text is reflected. In the future, please direct me towards added text (e.g., by providing guidance in your response or highlighting new text in the CEO ER) as it saves a lot of time! All points in this section are now cleared.

Agency Response
8 December 2025

1. As advised, explanatory footnotes have been inserted clarifying the meaning of both terms ?spatial plan? (on page 1) and ?spatial mapping? (on page 31) to ensure precision and consistency in their use throughout the document.

4. Thank you for this observation. We confirm that all on-the-ground activities under Component 1, including ecosystem restoration pilots, invasive species control, rehabilitation of degraded forests and wetlands, and community-based biodiversity management improvements, are fully costed under the USD 900,000 budget allocation in Output 1.1.2 (?Grant for implementation of 6 pilot sites?).

1. Coverage under USD 900,000

The USD 900,000 represents direct financing to community institutions (VEMCs, BMCs, JFMCs, Van Panchayats) to implement integrated conservation?livelihood models across approximately 195,000 ha. These funds support the full cycle of field implementation, monitoring, and adaptive refinement of pilot models, as summarized below

a. Implementation of Conservation?Livelihood Models: Each model will be tailored to state-specific ecological and socio-cultural conditions and implemented with full participation of women and Tribal Peoples and Local Communities (TPLCs). Activities include:

? Eco-restoration: assisted natural regeneration, enrichment planting with native species, soil and moisture conservation micro-structures.

? Invasive species management: manual/mechanical removal, community surveillance and prevention.

? Rehabilitation of degraded forests, fallows, and wetland catchments.

? Community-led fire prevention: fire lines, early warning, local response teams.

? Biodiversity-friendly livelihoods: sustainable NTFP management, small-scale nature-based enterprises.

? Landscape-specific models, such as:

- Springshed conservation linked to water governance (e.g., SARAA model, Uttarakhand),
- NTFP-based value chains for women-led enterprises,

- Barahanaja indigenous multi-crop seed systems for agrobiodiversity conservation,
- Community-managed ecotourism and birdwatching circuits,
- Ecological restoration integrated with invasive species control and fire management.

All pilots operate under inclusive governance arrangements (VEMCs, SHGs, JFMCs, traditional councils) and are formalized through community action plans to ensure accountability and long-term ownership.

b. Participatory Ecological and Socio-economic Monitoring: The grant finances field-based monitoring systems that track:

? Ecological outcomes: vegetation recovery, habitat condition, species sightings, water availability.

? Livelihood outcomes: income diversification, market access, gender-disaggregated livelihood gains.

? Institutional outcomes: participation of women and TPLCs, governance quality, transparency.

Monitoring will be community-led, using participatory protocols aligned with SES and FPIC requirements.

c. Field-Level Adaptive Refinement of Models: Grant resources support iterative improvements such as:

? Adjusting restoration techniques to climatic and ecological feedback.

? Refining livelihood models based on feasibility and community uptake.

? Strengthening governance capacities for planning, conflict resolution, and equitable benefit-sharing.

? Incorporating community feedback (women, youth, tribal groups) into improved implementation plans.

These actions ensure that pilots mature into scalable and replicable management models.

2. Distribution of USD 900,000

It is estimated that the USD 900,000 is distributed across six pilot clusters (two per state) with following indicative allocation for which values will be finalised during the inception phase:

? 40% ? Habitat restoration and eco-regeneration activities

? 20% ? Invasive species control and rehabilitation

? 15% ? Strengthening community governance and institutions

? 10% ? Participatory monitoring and field data collection

? 10% ? Integration of biodiversity-friendly livelihood components

? 5% ? Administrative, fiduciary and verification costs

3. Clarification on the On-Granting Mechanism

The project does not establish a new on-granting mechanism. Instead, funds are channelled through existing, government-recognized institutions using UNDP?s National Implementation Modality (NIM), as follows:

Executing Entities

? National: National Biodiversity Authority (NBA)

? State: State PMUs of the World Bank ELEMENT Project (Nagaland, Tripura) and the designated line department in Uttarakhand

Flow of Funds

GBFF ? UNDP ? NBA/State PMUs ? Community Institutions (VEMCs/BMCs/JFMCs)

All transfers follow national public financial management norms and UNDP fiduciary policies.

Pilot Site Selection: Pilot sites were identified during the PPG phase using ecological, socio-cultural, and governance criteria (including tenure clarity, TPLC participation, and complementarity with ELEMENT). No new competitive selection process is required.

Governance and Oversight

? National Steering Committee (MoEFCC, NBA, UNDP, World Bank)

? State Steering Committees

? Technical Working Groups on Restoration and Community Governance

Verification and Accountability: Disbursements will be reimbursable to the State Government and are milestone-based and linked to:

? Verified restoration activities and outputs

? Approved community action plans

? Monitoring data uploaded to MIS

? FPIC-compliant community agreements

? Field verification by SBBs and Forest Departments

This approach ensures strong fiduciary control, while placing community institutions at the centre of implementation, consistent with GEF, UNDP and WB requirements.

5. Thank you for this detailed observation. We appreciate the opportunity to clarify the ambition, sequencing, and logic of the project?s innovative financing architecture. The CEO-ER has been strengthened accordingly.

5(a) ? Ambition of leveraged finance under Outcome 2.2
We acknowledge that the USD 2 million target may appear modest relative to the overall budget. This figure is, however, intentionally calibrated to the specific mandate of Outcome 2.2 / Output 2.2.1 namely, to design, test, and institutionalize 1?2 robust biodiversity-linked financing instruments across three OECM landscapes, rather than maximize short-term mobilization during a five-year pilot.
The USD 2 million reflects only the incremental flows generated through new instruments piloted under this output (e.g., ABS-based mechanisms, biodiversity/green credits, ecotourism revenue-sharing), with at least 40% of beneficiaries being women or women-led groups. This target is appropriate for a proof-of-concept phase that must navigate:
? a complex legal and regulatory environment (ABS, CSR, forest and biodiversity laws);
? stringent FPIC, SES, and gender safeguards; and
? the need to emphasize quality, equity, and replicability over volume.

The USD 10.96 million allocated to Output 2.2.1 (GEF + co-financing) covers the entire innovation cycle viz., diagnostics, legal design, community co-creation, OECM-based piloting, revenue-sharing agreements, governance training, and preparation of replication tools and SOPs. Thus, the USD 2 million target represents the first wave of verified, safeguard-compliant flows, not the full ambition of CONSERVE on biodiversity finance.

The broader ambition is captured under Component 3 and the Results Framework, which aim to increase annual biodiversity-related public and private financing from USD 5 million (baseline) to USD 10 million per year by project end through budget tagging, new biodiversity-linked budget lines, and integration into State Plans. The USD 2 million under Outcome 2.2 should therefore be seen as a catalytic subset feeding into a long-term financing strategy.

5(b) ? Rationale for not finalizing mechanisms during the PPG Stage
We acknowledge the expectation that the PPG should narrow financing options; however, safeguards and regulatory requirements necessitate final selection during inception.
During PPG, a comprehensive long-list of viable options?including ABS flows, biodiversity/green credits, ecotourism models, and community stewardship incentives was identified through consultations with MoEFCC, NBA, SBBs, Forest Departments, and communities.
However, selecting the final ?1?2 mechanisms? requires additional due diligence not feasible before inception, including:
? FPIC-compliant consultations with IPLCs/TPLCs at landscape level;
? legal vetting with NBA and SBBs in light of evolving ABS and green credit rules;
? confirmation of safeguards readiness (SES, gender, financial transparency); and
? operationalization of institutional governance structures (PMUs, OECM committees, benefit-sharing bodies).

Accordingly, best practice sequencing is:
? PPG: identify feasible options and define the methodological approach;

? Inception: confirm legal/FPIC prerequisites and finalize the mechanisms;
? Implementation: co-design and pilot instruments under Output 2.2.1.

5(d) ? Reason for merging the second Outcome of Component 3 into Component 2
The earlier standalone Component 3 created conceptual duplication. The innovative finance pilots were inherently linked to OECM governance systems under Component 2, while Outcome 3.1 already addressed macro-level budget integration.

To improve coherence:
? Financing pilots were consolidated under Component 2 (Outcome 2.2), where FPIC, TPLC governance, and landscape management structures already exist.
? Component 3 now focuses exclusively on public financial management: BIOFIN methodologies, budget tagging, creation of biodiversity-linked budget lines, and long-term expenditure reforms.

This restructuring strengthens the Theory of Change by clearly distinguishing:
? Micro/meso level: community-based finance pilots (Component 2);
? Macro level: state and national finance reforms (Component 3).

Differences in budgets reflect their mandates: Component 2 covers full costs of field implementation, while Component 3 involves institutional reforms requiring lower resource investments.

17 October 2025

1. The term ?spatial mapping? has been used in the CEO ER to denote geospatial mapping?the process of GIS based mapping of biodiversity features, ecosystems, and land uses using spatial data layers (e.g., satellite imagery, GIS-based land cover, elevation, and climate data) to produce location-referenced outputs that can be integrated into planning systems.

While ?mapping? may refer to any descriptive inventory or thematic depiction, ?spatial mapping? specifically involves geo-referenced, multi-layered analyses that enable overlaying of ecological, socio-economic, and climate-vulnerability data for decision-making.

2. TOC diagram is corrected. Please refer to the TOC diagram on page 26.

3.

Component No.	Outcomes	Outcome Description
1. Strengthening Biodiversity Governance (UNDP)	Outcome 1.1: Biodiversity management integrated into spatial planning & 200,000 ha under improved management Outcome 1.2: Capacities for biodiversity monitoring strengthened through a national MIS and knowledge system	Clear separation of the two outcomes within one component to reflect distinct yet complementary result areas.

Component No.	Outcomes	Outcome Description
2. Advancing Community-Level Conservation (WB)	Outcome 2.1: OECMs established and managed through community co-management Outcome 2.2: Innovative financing instruments mobilized for community-level biodiversity conservation	Combines earlier Component 2 and part of former Component 3 to integrate OECMs + financing synergy.
3. Enhancing Biodiversity Finance (UNDP)	Outcome 3.1: Financial resources mobilized and efficiently allocated through updated biodiversity finance plans	Focuses solely on biodiversity budgeting and finance plans for NBSAP implementation.
4. Monitoring and Evaluation (UNDP & WB)	Outcome 4.1: Effective management, monitoring, and reporting covering safeguards, MTR and TE	Consolidates project coordination and adaptive M&E functions under a joint component.
By following your advice, we now reflect consistency across: ? The Theory of Change diagram and narrative (Section C); ● The Project Components Table (pages 3?4); ● Detailed description of the project components, outcomes, outputs and activities; and ● The Results Framework and Budget sections.		

4. Component 1 directly contributes to the improved management of 195,000 ha of biodiversity-rich production landscapes through spatially explicit, site-based planning, and management interventions implemented at the state level in Nagaland, Tripura, and Uttarakhand.

While this component emphasizes governance and planning, the outputs are not limited to desk-based activities. Ground-level management improvements are realized through:

? Participatory mapping of high-biodiversity landscapes (outside PAs) and integration of these areas into state spatial and land-use plans.

? Design and piloting of innovative management models (e.g., restoration of degraded forest fallows, sacred groves, and wetland catchments) implemented in collaboration with State Biodiversity Boards, Forest Departments, and BMCs.

? Strengthened local implementation capacity through training and knowledge transfer to field agencies managing those identified 195,000 ha.

? Integration of spatial and management data into the national MIS, enabling regular monitoring, reporting, and adaptive management.

These ground-linked interventions ensure that Component 1 generates tangible improvements in ecosystem condition and management practices over the targeted 195,000 ha, complementing the additional 5,000 ha under Component 2 (community-level OECMs). Together, they meet the total project target of 200,000 ha under improved biodiversity management, in full alignment with GBF Target 2.

The description of the Component 1 has been modified to bring more clarity on the above aspects.

5.

a. We acknowledge the reviewer?s feedback and would like to clarify that innovative financing under this component will be pursued through a structured, stepwise approach to ensure sustainability, transparency, and compliance with safeguards. While the target of USD 2 million in additional financing under Component 2 reflects the scale of pilot interventions, the overall ambition extends beyond this initial mobilization to establish a replicable model for long-term biodiversity finance across states under Component 3.

One key aspect of the innovative financing approach is leveraging ongoing investments under the ELEMENT project (reflected as co-financing). The innovation lies in CONSERVE building upon, rather than duplicating, ELEMENT?s interventions. Specifically, CONSERVE will focus on strengthening institutional frameworks and developing standard operating procedures (SOPs) within the State Biodiversity Boards to guide governance, monitoring, and benefit-sharing. These measures are critical to ensuring the long-term sustainability of investments made under both ELEMENT and CONSERVE.

Accordingly, the project will initially focus on developing a Biodiversity Finance Toolkit and associated Standard Operating Procedures (SOPs) under Component 2. These instruments will define eligibility criteria, benefit-sharing mechanisms, and safeguards compliance, and will be co-designed with MoEFCC, NBA, and SBBs to ensure alignment with national biodiversity and financial governance frameworks prior to capital mobilization.

Once institutional readiness is achieved, the project will pilot at least two financing mechanisms in selected OECM landscapes. Formal agreements and initial disbursements will be undertaken through FPIC-compliant and gender-inclusive processes. This phased approach ensures that capital is mobilized responsibly and directed toward verifiable biodiversity and livelihood outcomes, creating a strong foundation for scaling through BIOFIN, State Biodiversity Funds, and private sector partnerships during and beyond the project?s lifetime.

c. We would like to clarify that the integration of biodiversity financing into state budgetary processes involves a systematic sequence of expenditure reviews, budget tagging, and the establishment of biodiversity-linked budget lines within State Plans, undertaken in close collaboration with the Finance and Planning Departments. This approach institutionalizes recurrent and sustainable financing for biodiversity, moving beyond one-time, project-based allocations. Component 3 (Outcome 3.1 / Output 3.1.1) has been updated to specify these steps and corresponding indicators, incorporating BIOFIN methodologies to progressively enhance budgetary allocations and strengthen fiscal accountability for biodiversity.

6. The articulation between national and state levels is ensured through harmonized policy, fiscal, and digital frameworks?most notably the national biodiversity MIS with state-level dashboards and aligned finance tagging systems jointly developed by MoEFCC, NBA, and the State Finance and Planning Departments. Replication is embedded across all components through a structured roadmap comprising: (i) national policy and digital integration under Components 1 and 3; (ii) a Replication Toolkit consolidating OECM and FPIC models under Component 2; (iii) integration of biodiversity budget codes within the PFMS for fiscal replication; and (iv) capacity development through the iGOT platform and national knowledge hubs. These mechanisms collectively ensure scalability to additional states and long-term institutional sustainability.

A dedicated section on **National?State Linkages and Replication Roadmap** has been incorporated on page 49.

6.2 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 initiatives (e.g., government, other bilateral/multilateral).

Secretariat comment at CEO Endorsement Request
2025/09/16

1. The roles and responsibilities for each main stakeholder and the division of labour between WB and UNDP are useful and welcome. However it does not explain in the first place why there are two implementing agencies, which is unusual. Because it increases transaction costs, please provide a solid justification why the project cannot be implemented by a single agency.

2. In reference to the section on "responsible parties", if UNDP "supports the implementation" of Component 1 and the World Bank implements Component 2, who is implementing Components 1, 3 and 4?

3. Dual execution: please note the adoption of a revised policy on minimum fiduciary standards in June 2025 available here: https://www.thegef.org/sites/default/files/documents/2025-06/GEF_GA_PL_02_Policy_Minimum_Fiduciary_Standards.pdf. The policy states 5 scenarios whereby dual execution can be considered:

i. Due to legislative or regulatory restrictions in the country, executing entities are prohibited from receiving GEF funds;

ii. Per the capacity assessment carried out by the GEF Agency, there is a limited or inadequate fiduciary and / or procurement capacities in potential executing partners, as assessed by the GEF Agency;

iii. Fragile and Conflict-affected Situations (FCS) and / or post-natural disaster situations.

iv. Global or regional coordination child projects for Programs, global or regional platforms for knowledge sharing and Umbrella Enabling Activities for a group of countries.

v. NGI projects

Please identify which of these cases this project falls under. Evidence will need to be provided. In the case of (ii), the following are required: a HACT assessment to substantiate limited or inadequate fiduciary and/or procurement capacities; a capacity building plan explaining how they the EA?s capacity will be strengthened so that it does not require this type of execution support in the future; and confirmation that dual execution will not come at an extra cost to the project. If the exception is granted, please make sure to list the agency as an additional executing partner in the information sections (see screenshot below).

GEF Agency(ies):	UNDP	**GEF Agency Project ID:**	9953
	World Bank		
Project Executing Entity(s):	NATIONAL BIODIVERSITY AUTHORITY, MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE	**Project Executing Type:**	Government

2025/11/10

1-2. Thank you for this explanation. Please reflect this in the CEO ER.

3. Thank you for clarifying. The reason why further detail was requested on dual execution was because you had answered "yes" to the question "Will the GEF Agency play an execution role on this project?". I see this has been revised to "no" in the latest version, so you can consider this cleared.

2025/12/23

1-2. Thank you, these points are cleared.

Agency Response

8 December 2025

Thank you. A detailed justification for the dual Implementing Agency execution arrangement and the division of labour between UNDP and the World Bank is already provided on page 49 of the CEO-ER.

We have included an additional information on page 51 & 52, explicitly explaining (i) why two agencies are required, (ii) how the roles are differentiated across Components 1?4, and (iii) how this modality minimizes transaction costs and ensures full vertical integration from national fiscal reform to community-level implementation. The CEO-ER has therefore been duly modified to fully address the concerns.

17 October 2025

1. The joint implementation arrangement between the World Bank and UNDP has been deliberately designed to maximize complementarity, leverage existing institutional platforms, and ensure sustainability beyond the life of the GBFF project. This is not a duplication of effort but a strategic alignment of mandates and comparative advantages that together create a coherent, multi-level delivery architecture.

First, the GBFF-funded CONSERVE project is explicitly anchored in the World Bank?s ongoing ELEMENT Project, which is already mobilizing substantial co-financing for biodiversity, landscape restoration, and community-based resource management in two of the three target states?Nagaland and Tripura. The ELEMENT project provides the physical and institutional foundation for upscaling the CONSERVE pilots, enabling the GBFF resources to function as catalytic funding rather than stand-alone interventions. The World Bank?s involvement therefore ensures that GBFF investments are fully integrated into a broader programmatic platform backed by substantial domestic and multilateral financing. This directly responds to GBFF?s principle of achieving leverage and additionality through MDB engagement.

Second, UNDP and the World Bank bring distinct but complementary comparative strengths that align with the dual-scale design of CONSERVE. The World Bank leads on macro-level policy dialogue, fiscal and institutional reforms, and integration of biodiversity into state and national development frameworks, particularly through its engagement with Finance and Planning Departments and long-standing programmatic partnerships with the Government of India. UNDP, on the other hand, has deep technical and operational experience in biodiversity conservation, community engagement, safeguards, and capacity building, and a strong on-the-ground presence in

all three target states. Its operational networks with State Biodiversity Boards (SBBs), Biodiversity Management Committees (BMCs), and local governance institutions enable community-centered implementation and effective safeguards compliance.

2. Third, the two agencies operate under a coordinated and complementary division of labour that minimizes transaction costs. UNDP leads Components 1 and 3, focusing on strengthening biodiversity governance, integrating spatial and digital systems, and embedding biodiversity finance within national and state fiscal frameworks. The World Bank leads Component 2, concentrating on community-level implementation through OECM identification, co-management, and mobilization of innovative financing instruments. Component 4 on monitoring, evaluation, and adaptive management is jointly implemented to ensure coherence, consistency in safeguards and reporting standards, and unified fiduciary accountability. Both agencies collaborate through the National Project Steering Committee (NPSC) and shared M&E platforms to guarantee alignment, shared learning, and transparency across all levels of implementation.

This arrangement creates strong vertical integration by linking national policy reform with local implementation while ensuring that GBFF funds generate maximum catalytic impact through the World Bank?s investment pipeline and UNDP?s technical and safeguards systems. In effect, the dual-agency partnership reduces fragmentation, strengthens institutional coherence, and accelerates scale-up, thereby achieving efficiency and leverage well beyond what a single agency could deliver.

3. The **project does not involve dual execution.** UNDP and the World Bank are **co-implementing agencies (IAs)** and **NOT Executing Agencies** under the GEF partnership, each operating within their respective comparative advantages and approved implementation arrangements.

Execution will be undertaken entirely by national and state institutions:

? At the national level, the National Biodiversity Authority (NBA) serves as the Implementing Partner responsible for overall coordination and fiduciary management, consistent with UNDP?s National Implementation Modality (NIM). UNDP will process direct payments upon request from the Executing Agency/Implementing Partner. For such payments, the Government assumes full responsibility for the contracting process, including recruitment and procurement, and signs contracts in accordance with its own rules and regulations, the principles of which must conform to those of UNDP. It is important to note that, under this arrangement, UNDP?s role is limited to providing banking services only.

? At the state level, execution will be carried out by the State Project Management Units (SPMUs) of the World Bank-funded ELEMENT project in Nagaland and Tripura, and by a designated State Government Agency in Uttarakhand. These entities will serve as Responsible Parties under the project.

UNDP and the World Bank will provide implementation oversight, technical guidance, and fiduciary assurance, but will not execute project funds or undertake procurement directly. Consequently, none of the five scenarios outlined in the GEF Policy on Minimum Fiduciary Standards (June 2025) that justify dual execution apply to this project.

This arrangement maintains a clear separation between implementation and execution, ensures national ownership, and avoids any increase in transaction costs while benefiting from the complementary strengths of the two implementing agencies.

6.3 GEF Core indicators and GBFF indicators
a) Are the identified GBFF and relevant GEF 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 GBFF indicators, relevant GEF core indicators, and additional listed outcome indicators) reasonable and achievable?

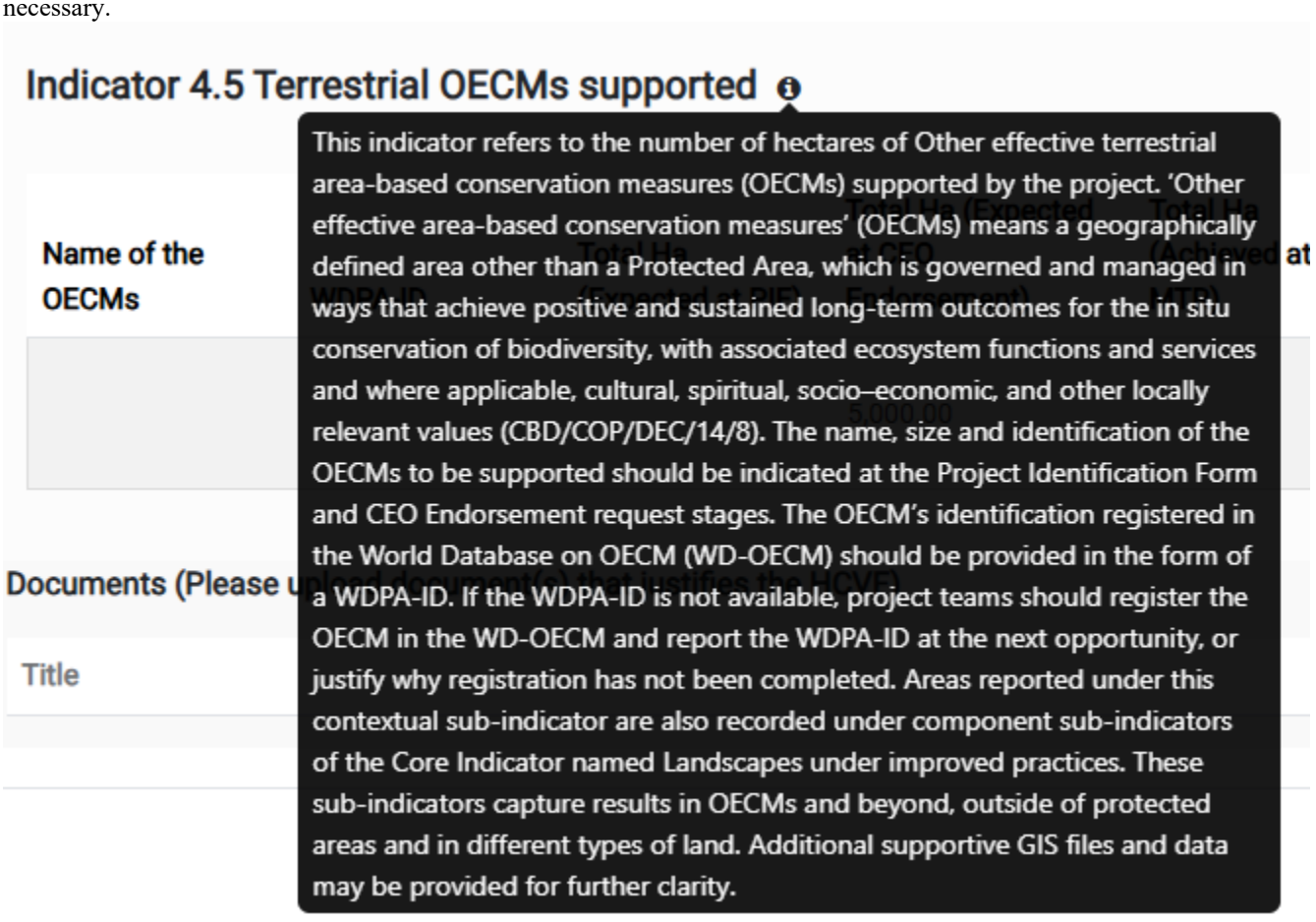
Secretariat comment at CEO Endorsement Request
2025/09/23

1. There are slight discrepancies in the results estimated, with the document sometimes referring to "up to 200,000 ha", sometimes 195,000 or 200,000 ha, sometimes "over 200,000 ha". Please ensure consistency across the proposal.

2. We will revert in the next round on comments on climate change mitigation calculations in annex 13b. Please accept our apologies for not being able to provide them in this round.

2025/11/10

1. Thank you. Indicator 4 still shows a total of 195,000 ha. Please double-check the explanation for indicator 4.5 (pasted below) and revise if necessary.



2. On the ExACT sheet, please find below the comments from the earlier version of the proposal. Some of these comments might now be easier to address since on-the-ground activities are now included in Component 1, but I would be grateful if you could address each of them in turn to ensure consistency across the CEO ER and Annex 13b:

a. For core indicator 6, please clarify what the hectares computed in the ExACT sheet corresponds to in terms of project activities.

b. Please note only hectares where a relative increase in biomass expected to result from project activities as a result of addressing drivers of landscape degradation should be accounted for.

c. As such, it seems the hectares accounted for in the current draft correspond simply to establishment of spatial plans for improved biodiversity, which is not something that should be accounted for under hectares with increased carbon sequestration.

d. Please either clarify explicitly the activities to be put in place in these hectares and how they will lead to a relative increase in biomass (most likely reducing the hectares to where this is confirmed to be applicable), or simply remove these hectares from the calculation.

e. The justification under the core indicator table refers to 5000 ha under restoration, which could not be found in the ExAct sheet. Please clarify how this restoration is expected to be implemented (what activities, what techniques, in what landscape under what level of degradation due to which drivers) and compute as applicable these hectares in the ExAct sheet.

2025/12/23 Thank you. Both points are hereby cleared.

Agency Response

8 December 2025

1. Thank you for flagging this inconsistency.

We would like to clarify Indicator 4 and made the corresponding correction in the portal entry as follows:

The total area under improved practices (CI-4 in the updated Core Indicator worksheet) is derived from separate sub-indicators. CI-4.1 represents the sum of sub-indicators 4.1?4.4, while CI-4.5 (terrestrial OECMs) is recorded separately and cannot be added to the CI-4.1 total.

In line with the updated CI guidance, these two sub-indicators are therefore entered separately in the portal. The overall total for CI-4 remains 200,000 hectares.

Specifically:

o Sub-indicator 4.1: 195,000 ha of biodiversity-rich production landscapes under improved management; and

o Sub-indicator 4.5: 5,000 ha of terrestrial OECMs established and co-managed by local communities.

2. Thank you for your kind feedback. We have amended the CEO ER and Annex 13b, as well as Annex 13a and Annex 14 to reflect the changes requested in comments (a)?(e) below.

a) The Core Indicator 6 target is derived from site-level implementation of sustainable use, restoration, and conservation mechanisms across 58,000 ha of high-biodiversity/critical ecosystems outside protected areas (PAs). The revised mitigation contribution is 3,482,427 CO2e (20-year estimate). The calculation and underlying assumptions are provided in Annex 13a, Table 2 (also reproduced below).

Table 2. Improved Management Target & Assumption (Hectares)

Target Landscape	Nagaland's Landscape	Tripura's Landscape	Uttarakhand's Landscape
Vegetation type	Tropical Moist Deciduous Forests	Tropical Moist deciduous	Tropical dry forest
Approach for improved management: sustainable use, restoration, and conservation mechanisms (e.g., community conservation regimes, OECMs, and so on), which will restore and improve ecological integrity. This will be done through community stewardship, culturally rooted practices, and scientifically informed planning. By linking ecosystem services, resilient livelihoods, and biodiversity outcomes, the restoration strategies ensure that landscapes are not only ecologically revived but socially and economically empowered. This integrated model will prevent further degradation, if not result in improved ecosystem health and quality. This intervention is based on the following degradation-level assumptions: • Baseline (Current): "Low" level of degradation • Without Project (Counterfactual): "Moderate" level of degradation • With Project (Intervention): Reduced to "Low" level of degradation	*Total area for improved management: 70,000* *Estimated area of intervention accounted for mitigation target:* ***20,000***	*Total area for improved management: 60,000* *Estimated area of intervention accounted for mitigation target:* ***18,000***	*Total area for improved management: 70,000* *Estimated area of intervention accounted for mitigation target:* ***20,000***
TOTAL Area Accounted for CO2 Mitigation	***20,000***	***18,000***	***20,000***

b) Thank you for the advice. We have revised the figure to 58,000 ha, with state-specific targets presented in Annex 13a, Table 2 (Please see our response to comment a).

c) Noted with thanks. We have adjusted the figures as explained in responses (a) and (b) above.

d) Thank you. The activities are described in Annex 13a, with further detail in the restoration annex.

In summary, these activities include the following:

1) Nagaland: strengthen Community Conserved Areas (CCAs) through:
o Degraded forest restoration using native species/alder regeneration, targeted soil stabilization, and capacity development of CCA committees.

- Formal OECM recognition
- Improving the traditional jhum (shifting cultivation) systems with longer cycles and agroforestry

2) Tripura: facilitate landscape restoration to safeguard water regulation, soil health, and biodiversity, though:
- Wetland/catchment management with participatory management plans, vegetative buffers, silt control, and hydrological restoration.
- Ecotourism-linked community stewardship
- Formal OECM recognition

3) Uttarakhand: facilitate spring-shed restoration, leveraging the state?s rich agroecological traditions and community stewardship. Building on JICA-supported plantations, the project will ensure synergy between forest restoration and livelihood generation through Gram Sabha-led maintenance.

e) Thank you for your feedback. There is no separate restoration target of 5,000 ha. The 5,000 ha. figure refers to the terrestrial OECM area to be created by the project. The ExACT carbon estimate covers 58,000 ha; with detailed assumptions and state-level targets are provided in Annex 13a, Table 2. Please note that carbon mitigation from OECM creation is not included in the ExACT estimate because OECMs will be established primarily in areas requiring minimal restoration but enhanced protection and management. Where restoration is required, it will be financed under ELEMENT; however, any mitigation from those activities will not be counted toward CONSERVE to avoid double counting.

17 October 2025

1. The project area under improved management (Core Indicator 4) totals 200,000 hectares, composed of 195,000 hectares of biodiversity-rich and critical ecosystems addressed under Component 1 through integrated spatial planning and landscape-level management (Sub Indicator 4.1), t, and 5,000 hectares under Component 2 through the recognition and co-management of OECMs led by local communities (Sub Indicator 4.5).

To ensure full consistency, all references across the CEO Endorsement Request have been standardized to 195,000 ha under Component 1 and 5,000 ha under Component 2.

2.

a. We confirm that the hectares entered in Ex-ACT align with the project scope. The carbon estimate is based on:

? 195,000 ha of high-biodiversity/critical ecosystems outside protected areas under improved management; and

? 5,000 ha of newly established terrestrial OECMs.

In total, 200,000 ha of priority landscapes are under improved management. The calculation applies the assumptions set out in Table 2 of Annex 13a.

Target Landscape	Nagaland's Landscape	Tripura's Landscape	Uttara Lands
Vegetation type	Tropical Moist Deciduous Forests	Tropical Moist deciduous	Tropic
Approach for improved management: restoring ecological integrity through community stewardship, culturally rooted practices, and scientifically informed planning. By linking ecosystem services, resilient livelihoods, and biodiversity outcomes, the restoration strategies ensure that landscapes are not only ecologically revived but socially and economically empowered. This integrated model will prevent further degradation, if not result in improved ecosystem health and quality. This intervention is based on the following degradation-level assumptions: • Baseline (Current): "Low" level of degradation • Without Project (Counterfactual): "Moderate" level of degradation • With Project (Intervention): Reduced to "Low" level of degradation	*70,000*	*60,000*	*70,00*
TOTAL	*70,000*	*60,000*	*70,00*

b. The estimated mitigation arises from the project?s activities, as set out in the CEO-ER and Annex 13b. The project will design, implement, and institutionalize innovative biodiversity management models tailored to the socio-ecological conditions of selected landscapes in Nagaland, Tripura, and Uttarakhand.

Building on the spatial planning under Output 1.2, these models will:
? re-assess each district?s existing spatial plan and overlay it with KBAs; and
? delineate areas for sustainable use, restoration, and conservation mechanisms (e.g., community conservation regimes, OECMs).

These actions will guide enhanced ecosystem management across ~200,000 ha and underpin the mitigation estimate.

State-Specific Approaches:
1. Nagaland: strengthen Community Conserved Areas (CCAs) through:
? Degraded forest restoration using native species/alder regeneration, targeted soil stabilization, and capacity development of CCA committees.
? Formal OECM recognition
? Improving the traditional jhum (shifting cultivation) systems with longer cycles and agroforestry
2. Tripura: facilitate landscape restoration to safeguard water regulation, soil health, and biodiversity, though:
? Wetland/catchment management with participatory management plans, vegetative buffers, silt control, and hydrological restoration.
? Ecotourism-linked community stewardship
? Formal OECM recognition
3. Uttarakhand: facilitate spring-shed restoration, leveraging the state?s rich agroecological traditions and community stewardship. Building on JICA-supported plantations, the project will

ensure synergy between forest restoration and livelihood generation through Gram Sabha-led maintenance.

c. The scope of the project?s interventions goes beyond the spatial planning improvement and adoption. In addition to spatial planning, the project will use co-financing to implement the innovative biodiversity management models described in our response to point b above, thereby enhancing the management of approximately 200,000 hectares of priority landscapes. In Ex-ACT, the hectares credited with increased carbon sequestration are precisely those under these improved management models.

d. Please see response to point b above.

e. We would like to clarify that the 5,000 ha refers to the OECM area to be created under the project. In Ex-ACT, these hectares are already included within the overall 200,000 ha target; they are not shown as a separate line item.

Because the state-level OECM areas will be determined during implementation, the Ex-ACT file does not yet disaggregate the 5,000 ha by state. Instead, the current entries indicate that 70,000 ha in Nagaland, 60,000 ha in Tripura, and 70,000 ha in Uttarakhand (total 200,000 ha) will be brought under improved management - within which the 5,000 ha OECM creation is included.

6.4 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
2025/09/16 Please summarize the "context: environmental and social" risk. Since the CEO ER is a stand-alone document, a mere reference to the SESP is not sufficient.

2025/11/10 Thank you. Cleared

Agency Response
17 October 2025

Context: environmental and social risks have been summarized in the risk table in the CEO-ER (Page 60-61)

7 C. Alignment with Programming Strategies, Country/Regional Priorities
7.1 a) Is the project adequately aligned with the GBFF Action Areas and, for MTF projects, with Focal Area objectives?

Secretariat comment at CEO Endorsement Request2025/09/16 cleared

Agency Response

7.2 Is the project aligned with the National Biodiversity Strategies and Action Plans, National Biodiversity Finance Plans, and/or similar instruments to identify national and/or regional priorities. For MTF projects, is the project aligned with other relevant country and regional priorities, policies, strategies and plans (including those related to the MEAs and relevant sectors)?

Secretariat comment at CEO Endorsement Request2025/09/16 cleared

Agency Response

7.3 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 Request2025/09/16 cleared

Agency Response

8 D. Policy Requirements
8.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request2025/09/23 cleared

Agency Response

8.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

2025/09/23 Gender is mentioned throughout the proposal but two elements should be strengthened:

1. Are any gender-specific measures or activities envisaged that go beyond a do-no-harm approach and aim to specifically benefit women? Part of achieving gender parity requires positive actions in favour of women to help level the playing field.

2. The results framework does not seem to have gender-disaggregated data. Please make sure to include gender-disaggregated indicators and targets.

3. Please strengthen Component 3 by integrating the activities and findings from the Gender Action Plan into the project description that address gender inequalities regarding women?s access to and knowledge on financial access.

2025/11/10 Thank you. All points above are cleared.

2026/02/13 Subsequent review by the team produced the following comments:

1. Please clarify whether the budget of the GAP is part of/extracted from the project component budget. Please note that reporting on the implementation of the GAP in its PIR, MTR and TE is expected, in particular on challenges, lessons learned and best practices, as well as any adjustments introduced (adaptive management).

2. Indicator 11 reflects a 50/50 women-men beneficiary distribution. However, many gender mainstreaming targets in the GAP only indicate "at least 30% of beneficiaries are women". Please adjust to align with Core Indicator 11 target

Agency Response
23 February 2026

1. The budget for implementation of the Gender Action Plan (GAP) is fully integrated within the respective project component budgets and is not presented as a stand-alone budget line. Gender-responsive activities and their associated costs are embedded across components to ensure systematic and operational mainstreaming of gender considerations throughout project implementation.

In accordance with GEF/GBFF requirements, progress on the implementation of the GAP will be reported through the PIRs, MTR, and TE. These reports will specifically document progress against GAP actions and indicators, including challenges encountered, lessons learned, best practices, and any adaptive management measures introduced to strengthen gender outcomes during implementation.

2. Thank you for the comment. The project maintains an overall target of achieving a 50/50 women?men beneficiary distribution in alignment with Core Indicator 11. This target will be monitored and reported at the aggregate project level.

Within the Gender Action Plan (GAP), certain activity-level targets indicate ?at least 30% women? as a minimum threshold. The 30% benchmark is intended as a floor to ensure meaningful and consistent inclusion of women across all relevant interventions. Implementation approaches will actively promote higher levels of participation, contributing toward the overall 50% women beneficiary target.

Therefore, while some individual activity targets specify a minimum of 30%, the cumulative results at the project level are designed to achieve the 50% women beneficiary target under Core Indicator 11.

17 October 2025

1. The project has adopted a gender-transformative design based on the Gender Analysis and Gender Action Plan (Annex 11). Gender-specific activities are embedded across all components to promote women?s leadership, equitable benefit sharing, and targeted capacity development. Key actions include:

? Ensuring ? 50 percent representation of women in BMCs and VEMCs involved in OECM planning and governance.

? Guaranteeing ? 40 percent of PES/ABS beneficiaries are women or women-led groups.

? Institutionalizing gender-responsive budgeting and biodiversity-finance tagging to earmark resources for women-led biodiversity enterprises.

? Integrating gender-disaggregated indicators into the national MIS and project M&E system to track progress and accountability.

These measures go beyond parity by addressing structural barriers and creating new opportunities for women?s participation in conservation governance and green livelihoods. Collectively, they advance GBF Targets 22 and 23, SDG 5, and India?s National Policy for Women (2016), ensuring women emerge as equal partners and beneficiaries of biodiversity outcomes.

A detailed section on ?Social Inclusion, Gender Equality, and women empowerment? has been further elaborated in the revised CEO-ER on pages 46-47.

2. Gender-disaggregated indicators and targets have been systematically incorporated into the revised Results Framework and aligned with the Gender Action Plan (Annex 11) and GBF Target 23 on gender equality and inclusion. Each relevant output and outcome now explicitly includes measurable gender indicators to ensure equitable participation and benefits for women, particularly from Tribal People and local communities.

The following key targets have been introduced or refined:
? Output 1.1.1: At least 50 percent women?s participation in all local spatial-planning consultations and capacity-building programmes related to biodiversity mapping and planning.
? Output 1.1.2: 195,000 ha of landscapes under improved management through piloted, community-centred models, directly benefiting 25,000 people (50 percent women) through equitable access to restoration-linked employment, decision-making, and benefit-sharing.
? Output 1.2.3: At least 50 percent women?s participation in capacity-building and training activities on the use of the biodiversity MIS for project MRV.
? Output 2.1.1: At least 50 percent women?s participation in OECM planning, co-management, and benefit-sharing processes to strengthen gender-responsive community governance.
? Output 2.2.1: At least 40 percent of ABS beneficiaries and biodiversity-enterprise participants to be women or women-led groups, ensuring gender-responsive access to financial and livelihood benefits.

Gender-disaggregated data will be captured through the project?s national biodiversity MIS and reported in annual PIRs, the Mid-Term Review, and the Terminal Evaluation. All implementing partners (NBA, SBBs, and State PMUs) will be required to monitor and report progress against these targets.

This strengthened Results Framework ensures that the project goes beyond a ?do-no-harm? approach by proactively advancing women?s empowerment, equal representation in governance, and equitable access to biodiversity-linked benefits across all components.

Please refer to PRF from pages 74-88 of the CEO ER document

3. The description of Component 3 (now component 2) in the CEO-ER has been strengthened to explicitly integrate findings and activities from the Gender Analysis and Gender Action Plan (Annex 11) to address persistent gender inequalities in access to financial resources, technical knowledge, and decision-making in biodiversity governance.

The revised component now ensures that gender equality is a structural pillar of community-based biodiversity management and biodiversity finance, rather than a cross-cutting safeguard. The text has been expanded to include targeted and measurable actions aimed at enhancing women?s financial literacy, participation, and leadership in biodiversity-linked financing mechanisms such, Access and Benefit-Sharing (ABS) schemes, and ecotourism revenue-sharing models.

Key gender-responsive measures now embedded within Component 2 include:

? Inclusion of women in OCEM management committee, including with key responsibilities that enhance their decision-making capacity, Women will also undergo planned capacity building

trainings and workshops. Given that CONSERVE will compliment ELEMENT, it will leverage the capacity development activities on women?s financial literacy, resource valuation, and enterprise management skills, enabling their effective participation in OECM governance and biodiversity-linked markets.
? Inclusive participation and representation: A minimum of 50% women?s participation is mandated in all OECM consultations, biodiversity mapping exercises, and capacity-building activities. Each OECM management plan will include a gender-specific section addressing barriers to women?s participation and detailing actions for equitable representation and leadership roles.
? Gender-responsive benefit-sharing: To ensure equitable access to financial benefits, the project commits that at least 40% of ABS and biodiversity-enterprise beneficiaries will be women or women-led groups. All revenue-sharing and financing agreements will include gender clauses that guarantee transparent and fair participation in benefit flows.
? Mentorship and peer learning: The project will establish peer-learning and mentorship networks linking experienced women entrepreneurs in biodiversity-related sectors with emerging women leaders in project landscapes, building long-term confidence and agency in financial and governance processes.
? Monitoring and accountability: Gender-disaggregated indicators have been introduced in the Results Framework to track women?s participation, capacity enhancement, and share of financial benefits under Outputs 2.1.1, 2.1.2, and 2.2.1.

Through these additions, the project now goes beyond a ?do-no-harm? approach to actively promote positive gender outcomes, increasing women?s control over financial resources, participation in biodiversity markets, and visibility in community decision-making structures. This aligns with GBF Target 23, UNDP?s Gender Equality Strategy (2022?2025), and India?s National Policy for Women (2016), while reinforcing inclusive, equitable, and sustainable biodiversity governance at both state and community levels.

Please refer to pages: 37 ? 39 Component 2 description & PRF (pages 74-88) of the CER document.

8.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

2025/09/23 In the SEP, please better describe different stakeholders by listing them (by name) and spelling out their specific roles and responsibilities related to project objective and components. This can be done in a table.

2025/11/10 Thank you, cleared.

Agency Response

17 October 2025

A table has been added under Section E of the SEP (Annex 10 of the ProDoc) detailing the different stakeholders along within their roles and responsibilities in relation to the project components and objectives.

Please refer to the table in SESP (Annex 10) from pages 57-60.

8.4 IPLCs:
a) Has the amount of GBFF project financing to support actions by IPLCs been sufficiently justified and have changes compared to PPG request stage, if any, been adequately justified?
b) If applicable, does Section C 'Project Description' describe the IPLCs who will benefit from the project and detail their role in the project? Have appropriate project tags related to IPLCs been selected?

Secretariat comment at CEO Endorsement Request
2025/09/23

1. Please confirm that TPLCs is the same as IPLCs and explain briefly the choice of departure from the usual GBFF terminology (e.g. use of national terminology).

2. Please make sure that all IPLCs counted in self-identify as indigenous (or tribal). Once you have identified which of the targeted populations are indigenous, you can pro-rate the costs of activities supporting actions by IPLCs by the proportion of IPLCs among the direct beneficiaries. Please provide the calculations in this section.

3. Please explain in this same section of the CEO ER how these activities support actions by IPLCs, i.e., how it empowers them rather than considering them passive recipients of GBFF financing.

2025/11/10 Thank you very much. Please note:

- The aspirational target is at portfolio level, not at project level, meaning that it is not a requirement for each project to meet the 20% target.

- Supporting "Actions by IPLCs" is understood as activities (i) that are designed by or co-designed with IPLCs according to their self-determined priorities (rather than "implemented by"); and (ii) that are designed through traditional or indigenous decision-making structures and institutions recognized by these IPLCs.

Please tweak the justification based on the second bullet above.

2025/12/23 Thank you. This is cleared.

Agency Response
8 December 2025

Thank you for this guidance. We confirm that the project?s use of the term ?Tribal Peoples and Local Communities (TPLCs)? remains conceptually equivalent to the GBFF-standard term ?Indigenous Peoples and Local Communities (IPLCs).? As noted earlier, the terminology reflects India?s constitutional and legal framework, which formally recognizes Scheduled Tribes (STs) and Local Communities as the rights-holders under the Biological Diversity Act (2002), Forest Rights Act (2006), and other relevant laws.

In line with GEF-SEC?s clarification, the justification has been further refined to reflect the definition of ?Actions by IPLCs.? Specifically:

? The project confirms that activities counted as ?Actions by TPLCs? are those that are designed or co-designed with TPLCs, in accordance with their self-determined priorities and not simply ?implemented by? them.

? All such activities are developed through traditional, customary, or community-recognized governance structures, including Gram Sabhas, Village Councils, JFMCs, BMCs, and tribal decision-making bodies notified under the Sixth Schedule and PESA (stands for The Provisions of the Panchayats (Extension to the Scheduled Areas) Act, 1996). This Act extends the provisions regarding Panchayats to Fifth Schedule areas, primarily inhabited by tribal communities.

? These participatory structures will guide planning, FPIC processes, validation of OECM governance models, design of conservation-livelihood pilots, and selection of innovative finance mechanisms?ensuring self-determination and cultural legitimacy.

We also confirm that:

? The GBFF?s 20% aspirational target is recognized as a portfolio-level goal, not a requirement for each individual project.

? Nevertheless, the CONSERVE project maintains strong alignment with the spirit of this target through meaningful TPLC engagement in planning, governance, and co-management.

The CEO-ER text in the relevant sections (page 16 and 72) has been updated to clarify the above and ensure full consistency in the use of ?TPLCs? as the nationally appropriate equivalent of ?IPLCs.?

17 October 2025

1. Yes, the term ?Tribal Peoples and Local Communities (TPLCs)? used in the CEO-ER is fully consistent in meaning with the GBFF?s standard terminology ?Indigenous Peoples and Local Communities (IPLCs).? The project intentionally adopts the term ?TPLCs? to align with India?s constitutional and legal framework, which officially recognizes Scheduled Tribes (STs) and Local Communities as the primary rights-holders under the Biological Diversity Act (2002) and related national legislation.

In India?s national context, the expression ?Indigenous Peoples? is not used in formal policy or legal instruments. Instead, ?Tribal Peoples? is the equivalent term used under the Constitution of India (Fifth and Sixth Schedules) and various national acts governing forest rights, biodiversity, and local self-governance. Therefore, the use of ?TPLCs? ensures legal accuracy, policy coherence, and institutional ownership within the country?s governance systems while maintaining full conceptual equivalence with the GBFF?s inclusive understanding of IPLCs.

To ensure consistency, the CEO-ER and related project documents clarify that all references to TPLCs are interchangeable with IPLCs for the purpose of global reporting under the GBFF and the Convention on Biological Diversity (CBD).

2. All local populations targeted under the project who are classified as Tribal Peoples under India?s Constitution and relevant state laws self-identify as Tribal Peoples in accordance with UNDP SES Standard 6 and GBFF criteria. In India, the terminology ?Tribal Peoples and Local Communities (TPLCs)? is used in the CEO-ER to reflect national legal usage while remaining equivalent to the global ?IPLCs? category.
Demographic data and stakeholder consultations confirm the following composition of Tribal populations in the target states:

? Nagaland ? 88 % Tribal

? Tripura ? 31 % Tribal
? Uttarakhand ? 18 % Tribal

Weighted by state-level coverage, approximately 72 % of total project beneficiaries are Tribal people. Accordingly, around 70 % of total project expenditures, including US$ 5.3 million of GBFF grant financing, directly support actions by IPLCs/TPLCs.
This includes:

? Output 1.1.2: US$ 0.9 million for piloting community-managed conservation-livelihood models;
? Output 2.1.1: US$ 3.0 million for participatory implementation of OECM management plans;
? Output 2.2.1: US$ 1.4 million for activation of biodiversity-finance instruments in OECM landscapes.

These allocations are fully consistent with the GBFF?s aspirational target for IPLC-related financing. During inception, FPIC-based baseline surveys will validate self-identification and refine cost attribution. All such expenditures will be tracked through the project?s financial monitoring and the MIS for GBFF reporting.

Section E - ?Policy Requirement? of CEO-ER has been modified to incorporate the above (Page 68-69).

3. The project has comprehensively addressed this observation in page 16 of the revised CEO-ER, which clarifies that Tribal Peoples and Local Communities (TPLCs) are equivalent to Indigenous Peoples and Local Communities (IPLCs) and are legally recognized under India?s constitutional framework.

This sub-section demonstrates that TPLCs are not treated as passive beneficiaries but as active decision-makers, implementers, and long-term custodians of biodiversity governance. Approximately US$ 5.3 million (42.8 % of total GBFF financing) directly supports actions executed by or through TPLC institutions such as Village Ecosystem Management Committees (VEMCs), Biodiversity Management Committees (BMCs), and Joint Forest Management Committees (JFMCs).

The empowerment pathways integrated into the project include:

? Inclusive governance: TPLCs hold ? 50 % representation in all community-level biodiversity governance bodies that plan, implement, and monitor conservation and restoration activities.

? Legal and tenure recognition: OECM management plans (Output 2.1.1) formalize community tenure and ensure Free, Prior and Informed Consent (FPIC) and transparent benefit-sharing.

? Capacity building and digital empowerment: Over 25,000 community members (50 % women) will be trained in biodiversity monitoring, valuation, and governance, supported by MIS-linked dashboards that provide real-time access to ecological and financial data.

? Financial empowerment: Under Output 2.2.1, the project pilots Payment for Ecosystem Services (PES), biodiversity credits, and Access and Benefit-Sharing (ABS) mechanisms that directly channel revenues to community-managed funds, with at least 40 % of beneficiaries being women or women-led groups.

? Policy integration: Community-driven OECMs are formally recognized by State Governments and reported to the National Biodiversity Authority (NBA), securing long-term policy and institutional legitimacy of TPLC?s stewardship.

Through these mechanisms, the project transforms TPLCs from beneficiaries to co-managers and decision-makers in biodiversity conservation, ensuring their leadership in planning, governance, and financial management. This approach is consistent with GBFF Programming Directions (2023-2027), UNDP?s Social and Environmental Standards (SES), and India?s National Biodiversity Action Plan (NBAP).

9 Annexes
Annex A: Financing Tables
9.1 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?

Secretariat comment at CEO Endorsement Request
2025/09/23

1. The ?GEF Project Grant? in the Total GEF Financing table per programming of funds should match the amounts provided in the ?GEF Project Financing? in the Action Area Elements table for the corresponding programming direction. Please amend.

Total GEF Financing Table

Resources Requested by Agency(ies), Country(ies), Focal Area and the Programming of Funds. All GEF sources of funds should be included here.

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Programming of Funds	Grant / Non-Grant	GEF Project Grant($)	Agency Fee($)	Total GEF Financing($)
UNDP	GBFF	India	Biodiversity	GBFF Action Area 1	Grant	1,954,587	175,913	2,130,500.00
UNDP	GBFF	India	Biodiversity	GBFF Action Area 2	Grant	2,650,000	238,500	2,888,500.00
UNDP	GBFF	India	Biodiversity	GBFF Action Area 4	Grant	1,584,863	142,637	1,727,500.00
World Bank	GBFF	India	Biodiversity	GBFF Action Area 1	Grant	1,954,587	175,913	2,130,500.00
World Bank	GBFF	India	Biodiversity	GBFF Action Area 2	Grant	2,650,000	238,500	2,888,500.00
World Bank	GBFF	India	Biodiversity	GBFF Action Area 4	Grant	1,584,863	142,637	1,727,500.00
					Total GEF Resources($)	**12,378,900.00**	**1,114,100.00**	**13,493,000.00**

Action Area Elements (and Focal Area Elements for Multi-Trust Fund projects)

Programming Directions	Trust Fund	GEF Project Financing($)	Co-financing($)
GBFF Action Area 1	GBFF	6,470,812.00	33,051,783.00
GBFF Action Area 2	GBFF	4,753,167.00	24,302,893.00
GBFF Action Area 4	GBFF	1,154,921.00	5,895,324.00
	Total Project Cost ($)	**12,378,900.00**	**63,250,000.00**

2025/11/10 Thank you, cleared

Agency Response
17 October 2025

The discrepancy has been rectified. The ?GEF Project Grant? in the Total GEF Financing Table and Action Area Elements Table now match.

9.2 Source of Funds
If using GEFTF resources, 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 Request2025/09/23 cleared

Agency Response
9.3 Confirmed co-financing for the project, by name and type:
Noting GBFF does not require but encourages co-financing, 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
2025/09/23

1. Evidence provided for co-financing from the States of Nagaland and Tripura seem to be requests for the Government of both states to label funds allocated to already existing schemes as co-financing for this project. As such, these do not constitute co-financing letters. Please upload the correct documents as soon as they are available.

Please also note that:

- Only financing towards the activities listed in the proposal can be counted as co-financing. Funding for activities outside the scope of the project, even if they are related to biodiversity and within any of the three states included in this project, does not count as co-financing.

- The co-financing ratio requirement of 1:7 does not apply in the case of the GBFF, although the co-financing ratio presented in this proposal is very welcome.

2. I was unable to locate the co-financing letter from the World Bank for $30 million in loans. Please let me know where I can find it or upload it in the next submission.

2025/11/10

1-2. Thank you. Please note that co-financing can only be included in this proposal if it is backed with a co-financing letter. Any source of co-financing that does not have a letter from the source would need to be removed, with potential knock-on effects on the budget, scope of funded activity, impact, activities and indicators.

2025/12/23

1. If you cannot secure co-financing letters (or equivalent, as suggested by the GEF Secretariat in an email dated 4 December 2025), the corresponding co-financing cannot be included in the proposal. It would need to be removed from the CEO ER and project scope and activities revised accordingly.

2. Thank you. The co-financing letter from the WB for $30m is cleared.

2026/02/13 Thank you for exchanging with us by email on the challenges encountered in securing the co-financing letters. This issue remains outstanding, with the understanding that you will send us these letters as soon as you secure them.

In addition, a review by the team revealed the following comment: there is no co-financing allocated to PMC. While GBFF projects don't require co-financing, please explore some sharing of PMC across all funding sources:

	GEF financing	Co-financing
Sub Total ($)	**11,789,429**	**30,250,000**
Project Management Cost (PMC)		
GBFF	589,471	
Sub Total($)	**589,471**	-
Total Project Cost($)	**12,378,900**	**30,250,000**
PMC share of Sub-total	5.0%	0.0%

2026/02/23 Thank you, cleared (pending clearance by the OP team). Please note any additional co-financing could trigger revisions in financing and budget tables across the CEO ER.

Agency Response

23 February 2026

1) UNDP and the World Bank continue to actively engage with the concerned State Governments to secure the pending co-financing commitment letters. We appreciate the Secretariat?s flexibility and confirm that the signed letters will be transmitted to the GEF Secretariat immediately upon receipt.

In parallel, discussions are ongoing with the Ministry of Environment, Forest and Climate Change (MoEFCC) and the National Biodiversity Authority (NBA) to formalize additional national-level co-financing commitments, which will further strengthen the documented co-financing framework of the project.

2) With respect to the observation regarding the absence of co-financing explicitly allocated to PMC, we would like to clarify that, in two project states?Tripura and Nagaland?the existing PMUs

established under the World Bank?financed ELEMENT project will provide implementation support to CONSERVE activities.

This includes technical coordination, financial management oversight, procurement support, and monitoring functions. As such, management and coordination functions are effectively being shared across funding sources. This arrangement represents practical cost-sharing of PMC-related functions and enhances overall resource efficiency, even where PMC co-financing is not separately itemized in the co-financing table.

In addition, as suggested by the GEF Secretariat, we have redistributed a portion of the confirmed USD 30 million co-financing to explicitly reflect support toward PMC in the co-financing table. This adjustment ensures that the cost-sharing of project management functions is more clearly captured and aligned with the Secretariat?s guidance. We will further update the co-financing for the components and PMC, once full co-financing commitments are formally confirmed from the three states and MoEFCC/NBA.

27 January 2026

In response to the Secretariat?s comment, and following discussions between the World Bank and UNDP teams, the CEO ER has been revised to remove all unconfirmed State Government co-financing. Total co-financing has accordingly been revised from USD 63.25 million to USD 30.25 million, reflecting exclusively confirmed commitments from the World Bank and UNDP, for which formal co-financing letters have been submitted.

Despite sustained engagement with the Governments of Nagaland, Tripura, and Uttarakhand during and following the PPG phase, co-financing letters for the indicative amounts (USD 11 million per state) could not be secured within the CEO-ER endorsement timeline. Subsequent discussions led by the Executing Agency, the National Biodiversity Authority (NBA), clarified that issuance of such letters would require: (i) explicit earmarking or revision within approved State budgets; (ii) concurrence of State Finance Departments; and (iii) alignment with annual budget cycles and statutory approval processes. These requirements are inherently time-consuming and have delayed issuance of formal letters; this constraint is procedural in nature and does not reflect any reduction in commitment by the States.

The Executing Agency (NBA) will continue to actively pursue the State-level co-financing commitments in close coordination with the three State Governments. It is anticipated that the requisite commitments can be secured ahead of the June Council meeting once the necessary procedural formalities have been completed, and the co-financing figures will be updated accordingly prior to signature of the Project Document and reported in subsequent Project Implementation Reports (PIRs).

Importantly, all project outputs?except for the large-scale conservation works covering approximately 195,000 hectares?are fully financed through GBFF resources. GBFF financing covers the complete design, piloting, implementation, and monitoring of landscape-level interventions, OECMs, community institutions, and biodiversity finance instruments. Indicative State contributions were envisaged solely to support replication, scaling-up, and long-term sustainability of successful GBFF-financed pilots through convergence, whereby ongoing State and Centrally Sponsored Schemes in forestry, rural development, livelihoods, agriculture, and local governance can adopt and expand these models through normal planning and internalization processes.

Accordingly, while indicative State co-financing has been removed from the CEO-ER, the project?s implementation logic, physical targets, and development impact remain unchanged and fully achievable, consistent with the Project?s Results Framework.

Please refer to the following section in the CEO ER document:

- Project description overview (Pg. 3-5)

- Project outline: Changes compared to PPG request (pg. 5-7)

- Annex A ? financing tables (pg. 73-74)

8 December 2025

The co-financing letters from the State Governments of Nagaland, Tripura, and Uttarakhand are still under negotiation and are expected to be secured during the inception period.

Regarding the USD 30 million co-financing commitment under the ongoing ELEMENT project financed through an IBRD loan, the co-financing letter from the World Bank has been received and uploaded to the portal.

17 October 2025

1. This is to confirm that the State Governments of **Nagaland, Tripura, and Uttarakhand** are in the process of finalizing their co-financing commitments through their respective Finance Departments for the issuance of formal Co-financing Commitment Letters for the GBFF CONSERVE project. These letters will be submitted to the GEF Secretariat as soon as they are issued.

Co-financing from the three states is derived from programmatic convergence with the World Bank?supported **ELEMENT Project** and other state budget allocations (from different line

departments) that directly support activities and outputs listed under the GBFF CONSERVE project.

We fully acknowledge the GEF Secretariat?s guidance that only financing directly linked to project activities may be considered as co-financing. This clarification has been discussed with the three State Governments, and only funding explicitly aligned with approved project activities and outputs is being counted toward co-financing. Unrelated or parallel biodiversity programs have been excluded. All co-financing will be channelled through the same institutional framework?**NBA, State Biodiversity Boards, and ELEMENT State Project Management Units (SPMUs)**?as defined in the project?s institutional arrangements.

Verification of the co-financing will be undertaken through the **Annual Project Implementation Reports (PIRs),** which will confirm the actual realization of contributions from the respective Planning and Finance Departments. These reports will detail the relevant budget heads, amounts, timeframes, and implementing entities, **ensuring full activity-level traceability. All contributions will be mapped to corresponding outputs in the results framework to guarantee transparency** and auditability.

While the GBFF does not prescribe a fixed co-financing ratio, the USD 63 million presented represents genuine, verifiable, and activity-linked co-financing that directly supports GBFF CONSERVE outcomes and demonstrates strong state ownership and commitment to sustainability. The updated co-financing letters will be uploaded for GEF?s review prior to CEO Endorsement.

2. As co-financing is not mandatory for GBFF projects, the World Bank will not be issuing a formal co-financing letter. However, it is confirmed that CONSERVE will directly leverage and build upon ongoing investments under the World Bank?s ELEMENT project, particularly those related to habitat restoration, biodiversity value chains, and capacity-building initiatives. These complementary investments provide clear synergies and demonstrable co-benefits to CONSERVE, ensuring that project interventions are mutually reinforcing and effectively contribute to shared biodiversity and livelihood outcomes.

Annex C: Project Results Framework
9.4 a) Have the GBFF indicators and relevant GEF core indicators been included?
b) Have SMART indicators been used; are means of verification well thought out; are the targets appropriate for the 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 Request
2025/09/23 I was surprised to find "Indicator 3: Volume of sustainable biodiversity finance mobilized annually from public and private sources to support NBSAP implementation" with a mid-term target of $70m/year, up from the $50m/year baseline, and an end-of-project target of $100m/year. This is substantially more than the $2m target mentioned under component 3. Although the two are not necessarily contradictory since the $2m target focuses on innovative mechanisms, a target which aims to double biodiversity finance (from all sources) from $50m

to $100m/year needs to feature very prominently in the proposal, not be tucked away in the results framework.

I recommend expanding on this target, explaining how you got to the figures proposed (a simple indicative breakdown) and providing the list of potential sources of additional finance. A leveraged finance amount of $1b over 20 years also deserves being a headline for the project. Such a level of ambition needs to feature front and centre and could be one of the key messages around which the proposal is organized (see general comments below).

2025/11/10 Thank you for this revision. While more modest, these figures remain significant. I recommend:

(i) Ensuring consistency with the $2m leveraged in Component 3 (i.e., using the arguments you provided above to explain why you have $2m in C3 and 5/7.5/10m in the results framework);

(ii) Providing cumulative figures over the years of financing that is mobilized/aligned with biodiversity as a result of this project and making these figures feature more prominently, including in the project summary. You can also provide a bar chart showing how the figures add up year after year over an indicative 20-year horizon (e.g., year 1 = 5m; year 2 = 10 m etc.). You will quickly be running into figures in the hundreds of millions, which is a headline in itself.

(iii) Given the importance of this output, explaining how you got to these figures, notably by providing underpinning calculations and assumptions. Are these figures for the three states only, or based on the assumption that the project will be replicated/scaled up across the country?

2025/12/23 Thank you for this explanation which is accepted. You can consider this point cleared.

Agency Response

8 December 2025

(i) Consistency between the USD 2 million (Outcome 2.2 under Component 2) and USD 5?10 million/year (Objective level - **Indicator 3**)

The CEO-ER now explicitly distinguishes the two financing streams to avoid ambiguity. This was also elaborated in the above feedback (5b):

? Outcome 2.2 (**Indicator 11** - innovative financing pilots): Mobilization of USD 2 million in new, direct, safeguard-compliant revenue flows through biodiversity-linked instruments piloted in OECM landscapes. These represent proof-of-concept mechanisms, designed to demonstrate viability, equity, and compliance with FPIC, SES, and national legal frameworks.

? **Indicator 3** (public and private biodiversity finance): A system-level increase from USD 5 million (baseline) to USD 10 million/year through biodiversity budget tagging, establishment of biodiversity-linked budget lines, and integration of biodiversity actions into regular state plans and expenditure frameworks under Component 3.

The revised CEO-ER clarifies that:

? USD 2 million represents catalytic, landscape-level flows generated through new instruments;

? Whereas, USD 10 million/year reflects broader public expenditure and domestic resource mobilization achieved through fiscal reforms, integration of biodiversity actions into State Plans, and institutionalization of budget tagging.

(ii) Cumulative figures and prominence in the CEO-ER

We appreciate the suggestion regarding multi-year cumulative projections. However, given that the project is establishing new systems of biodiversity expenditure tagging and fiscal integration, projections beyond the 5-year project period would be premature at CEO-ER stage. To maintain analytical rigour:

? The CEO-ER highlights the 5-year cumulative increases that can be reliably estimated, based on the USD 5m ? 7.5m ? 10m trajectory.

? Longer-term cumulative figures will be developed during implementation, once state-level systems are institutionalised and expenditure datasets stabilize.

(iii) Methodology and assumptions underpinning the USD 5m ? 10m/year estimate: The estimates are derived from:

? **Preliminary biodiversity-relevant expenditure baselines** and consultations with state Finance and Planning Departments during the PPG phase: The National Biodiversity Authority (NBA) relies on Grants-in-Aid from the Government of India to fund its core activities, including biodiversity conservation, research, and implementation of the Biological Diversity Act, 2002. This government support forms a reliable b??aseline, averaging over USD 1.81 million (?16 crore) annually for the given period of 2020-21 to 2024-25. The NBA mobilizes resources through Access and Benefit Sharing (ABS) funds derived from users of biological resources, as per the Biological Diversity Act, 2002. The annual average collection for the given period of 2020-21 to 2024-25 is USD 3.33 million (29.50 crores). Thus, the annual resource mobilization capacity of NBA is $ 5.15 million USD.??

? Application of BIOFIN methodology for expenditure tagging and identification of biodiversity-linked budget lines;

- Conservative assumptions restricted to the three project states (Nagaland, Tripura, Uttarakhand);
- Exclusion of any national or replication effects unless formally adopted during implementation.

17 October 2025

The $70m?$100m figures were typographical errors; corrected baseline is USD 5m/year and end-target USD 10m/year. This target reflects total national and state biodiversity finance mobilized via institutionalized budget tagging, costed action plans, and blended finance mechanisms, measured through BIOFIN methodology and verified under CBD reporting.

Annex D: Status of utilization of PPG
9.5 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

2025/09/23 Please list the activities implemented during the PPG phase rather than providing broad categories. This will enable us to better assess the validity of each. Some items are not eligible without additional details to be validated, e.g., ?Supplies?.

2025/11/10 Thank you. Could you kindly indicate where this additional explanation is located in the proposal?

2025/12/23 Thank you, cleared.

Agency Response

8 December 2025

The additional explanation of the PPG Utilization is added under the Annex D below the table in the CEO ER. It is also included in the portal under Annex D section.

17 October 2025

Information is provided as requested.

International Consultants

Supported Team Leader and other consultants in development of Project Document and SESP Package for submission. Stakeholder consultations and preparation of background documents that fed into the CEO Endorsement Request

1. International PPG Team Leader for Project Development

2. International consultant to assist the PPG team leader, support to prepare GHG estimate, spatial analysis.

3. International Safeguard Specialist

National Consultants

Included technical experts for the development of baseline assessments, feasibility studies, and drafting of the project framework. This included preparation of technical inputs on biodiversity, policy, and financing mechanisms, as well as stakeholder engagement plans.

1. National Biodiversity Specialist

2. Finance Specialist

3. IT Expert

4. Junior Technical Consultant

Travel: Covered domestic and international missions (PPG Team Leader) undertaken during the PPG phase for consultations with stakeholders, site visits to 3 states, and coordination meetings. This enabled data collection and validation with government counterparts, civil society, and local communities.

Contractual Services (Companies): Engaged an agency to conduct Final Stakeholder Consultation with MoEFCC, NBA, States and other relevant stakeholders to project consultants followed by organizing the Validation Workshop for vetting of data collected for CEO ER with States.

Supplies: The expenditure reported relates specifically to printing consumables required for preparing project documentation, stakeholder workshop materials, and official submissions during the PPG phase. These were essential for ensuring effective consultations and preparation for the project design and the documents.

Audio-Visual and Print Production Costs: Covered design and printing of consultation materials such as FPIC sheets (attached in PPG Consultation Annex), infographics, and project communication materials in multilingual used in multi-stakeholder consultations during project design missions.

Training, Workshops and Conferences: Supported the organization of multi-stakeholder consultations, validation workshops, and technical meetings with government counterparts, CSOs, and private sector representatives. These inputs were critical to shaping the project design and ensuring broad ownership.

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

Secretariat comment at CEO Endorsement Request
2025/09/23 The maps provided in annex 3 are a bit blurry and the legend difficult to read. Could you upload sharper versions?

2025/11/10 Thank you. Although the smallest fonts are still difficult to read, we can consider this cleared.

Agency Response
17 October 2025

High quality maps of the 3 states have been included in the revised CEO-ER.

Annex F: Environmental and Social Safeguards Documentation and Rating
9.7 Have the relevant safeguard documents been uploaded to the GEF Portal? Has the safeguards rating been provided and filled out in the ER field below the risk table?

Secretariat comment at CEO Endorsement Request
2025/09/23

1. Please ensure that Free, Prior, and Informed Consent (FPIC) is applied to Indigenous Peoples? knowledge. Specifically, please include a line in the project document, CEO ER and Indigenous Peoples Plan indicating that any knowledge derived from Indigenous Peoples will follow the FPIC process.

2. In the project document and CEO ER, in the table of key risks, include a summary of ESS-related risks and corresponding mitigation measures.

2025/11/10 Thank you. cleared

2026/02/13 Further review by the team produced the following comments: We note that UNDP attached Social and Environmental Screening Template, ESMF, Gender Action Plan, Stakeholder Engagement Plan, and IPPF and Grievance. An overall ESS risk is classified as Moderate. It is great to see that the project will ensure FPIC for OECM management plan.

1. Please clarify whether the project ensures FPIC about the project design (particularly project governance mechanisms, integration of traditional and local knowledge, and priority of activities in Component 1 and 2) by IPLCs/Tribal Peoples and Local Communities (TPLCs) during PPG, since IPLCs/TPLCs will play critical role in the project.

2. Please clarify how the results of the consultations with IPLCs/TPLCs were integrated into the project during the PPG.

3. Please clarify how the project supports IPLCs/TPLCs security of tenures throughout project particular in Component 1 and 2.

4. Please consider incorporating monitoring indicators related to respect IPLCs/TPLCs 1) governance mechanisms, 2) traditional and local knowledge, and 3) security of tenures in the project.

2026/02/23 Thank you, cleared (pending clearance by the OP team)

Agency Response
23 February 2026

1.

Yes, Free, Prior and Informed Consent (FPIC) principles were applied during the PPG phase, particularly with respect to project governance mechanisms, integration of traditional and local knowledge systems, and prioritization of activities under Components 1 and 2.

During project design, consultations were undertaken with Indigenous Peoples and Local Communities (IPLCs) /Tribal Peoples and Local Communities (TPLCs) to ensure that their perspectives, customary institutions, traditional knowledge systems, and development priorities were adequately reflected in the project architecture. These consultations informed:

? the selection and confirmation of priority landscapes;

? the design of governance and institutional coordination mechanisms; and

? the identification and prioritization of community-level interventions under Components 1 and 2.

Specific references have been strengthened in the CEO-ER under: Component 1 - Activities 1.1.2.5 and 1.1.2.7 (Page 33); and Component 2 - Activities 2.1.1.3 and 2.1.1.4 (Page 40).

In Tripura and Nagaland, where implementation will be closely aligned with the World Bank-supported ELEMENT project, established environmental and social safeguard frameworks ? including provisions relevant to Indigenous Peoples are already in place and publicly disclosed. These frameworks provide additional procedural assurance regarding FPIC, stakeholder engagement, grievance redress mechanisms, and protection of traditional and local knowledge systems.

FPIC and inclusive participation will continue to be operationalized during project implementation through structured community consultations, representation of IPLCs/TPLCs in project governance mechanisms, culturally appropriate engagement processes, and ongoing application of the IPPF and Stakeholder Engagement Plan.

2.

The results of consultations with IPLCs/TPLCs conducted during the PPG phase were systematically documented in the PPG Consultation Report and directly informed the final project design. Inputs received were integrated across components, governance arrangements, and landscape selection, as outlined below:

Strengthening governance mechanisms and customary institutions: In Nagaland, consultations with Village Councils, Community Conservation Area (CCA) Committees, and institutions such as KNCTS (Khonoma) and the Sendenyu Biodiversity Reserve informed the design of community-led OECM identification processes and co-management structures. The project governance framework explicitly provides for representation of customary institutions and community decision-making bodies, ensuring alignment with traditional governance systems.

Integration of traditional ecological knowledge: Communities emphasized the importance of indigenous farming systems (e.g., alder-based agroforestry systems, jhum cultivation cycles,

and native rice and millet varieties in Longleng), customary conservation rules (including seasonal hunting bans and CCA resolutions), and ethnobotanical knowledge. These inputs have been incorporated into Components 1 and 2, particularly in biodiversity mapping, OECM management planning, sustainable land-use practices, and restoration approaches. Traditional knowledge will be documented, validated, and applied alongside scientific methodologies.

Livelihood priorities linked to conservation outcomes: Consultations in Uttarakhand (Van Panchayats and Self-Help Groups), Nagaland (SHGs and CCAs), and Tripura (fishing communities around the Dumbur and Rudrasagar landscapes) highlighted priorities such as value addition, improved market linkages, water conservation, community seed banks, and eco-tourism opportunities. These priorities are reflected in the design of livelihood-linked conservation interventions and capacity-building measures to ensure that biodiversity objectives are aligned with local development aspirations.

Participatory landscape selection: The final selection of intervention landscapes (e.g., Khonoma?Longleng, Lansdowne, and Dumbur/Rudrasagar) was directly informed by stakeholder recommendations during inception and field consultations. Selection criteria incorporated ecological significance as well as demonstrated community readiness, existing governance systems, and expressed interest in OECM-related engagement.

Overall, the PPG consultations ensured that the project design reflects locally identified conservation priorities, customary governance structures, and traditional knowledge systems. This process strengthened ownership, enhanced alignment with IPLC/TPLC aspirations, and provides a sound basis for continued engagement, including the application of FPIC principles during implementation.

3.

Under Components 1 and 2, the project supports IPLC/TPLC tenure security through measures that strengthen recognition, governance, and documentation of customary and community-managed lands, without altering existing ownership regimes.

Key interventions include:

1. Participatory mapping and documentation of customary territories: The project will support participatory mapping of community-managed areas to clarify boundaries, document customary use, and record governance arrangements. This process enhances tenure clarity, reduces potential disputes, and provides an evidence base for formal recognition processes where applicable.

2. Identification and recognition of OECMs: Through the identification and formal recognition of OECMs, the project supports institutional acknowledgment of community-conserved areas. This strengthens the legitimacy of community stewardship within national biodiversity frameworks and contributes to longer-term tenure security.

3. Community-endorsed OECM Management Plans: Management plans will be developed through inclusive consultations and endorsed by community institutions. These plans will reflect customary rules, traditional conservation practices, and locally agreed governance arrangements, thereby reinforcing community authority and stewardship rights.

4. Capacity-building of community governance institutions: Targeted capacity-building will be provided to Village Councils, Community Conservation Area (CCA) Committees, Van Panchayats, Self-Help Groups, and other relevant local institutions to strengthen governance, financial management, compliance with safeguards, and engagement with government agencies.

In Nagaland, where most forest lands are owned and managed by communities, clans, and families under customary tenure systems, the project builds on these established systems and supports their formal recognition through OECM processes, thereby reinforcing rather than modifying existing tenure arrangements.

In Tripura and Uttarakhand, OECM identification and management planning will follow applicable government procedures. In Uttarakhand, for example, Van Panchayats will play a central role in governance and management planning. The project will facilitate alignment between community institutions and state-level frameworks to strengthen institutional recognition and management authority.

Overall, the project contributes to enhanced tenure security by improving clarity, formal recognition, governance capacity, and institutional linkages of IPLC/TPLC-managed areas, while fully respecting existing legal and customary ownership structures.

4.
Thank you for this suggestion. The project design already incorporates substantive measures related to IPLC/TPLC governance mechanisms, integration of traditional and local knowledge, and strengthening of tenure security under Components 1 and 2. These elements are embedded in both the results framework and implementation arrangements.

Specifically:
1. Governance mechanisms - The results framework includes indicators related to:
? Number of OECMs identified and formally recognized with community representation;
? Number of community-endorsed OECM management plans developed and operationalized;
? Number of community governance institutions (e.g., Village Councils, CCAs, Van Panchayats) strengthened through capacity-building.
These indicators collectively track improvements in inclusive governance, representation of customary institutions, and participatory decision-making processes.

2. Traditional and local knowledge - Project outputs under Components 1 and 2 include documentation and application of traditional ecological knowledge in biodiversity mapping, land-use planning, and OECM management planning. Monitoring will capture the number of management plans and land-use practices that explicitly integrate traditional knowledge systems and customary conservation rules.

3. Security of tenures - Indicators related to participatory mapping, formal OECM recognition, and institutional strengthening of community-managed areas contribute to monitoring enhanced tenure clarity and recognition. These measures track improvements in documentation, formal acknowledgment, and governance of IPLC/TPLC-managed lands, while respecting existing ownership regimes.

In addition, the project is operationally aligned with the USD 30 million World Bank-supported ELEMENT project, which includes established environmental and social frameworks and monitoring provisions relevant to community governance and tenure systems. Given the convergence in select landscapes, relevant monitoring data generated under ELEMENT?particularly on participatory planning, institutional strengthening, and customary tenure arrangements?will be leveraged, where appropriate, to demonstrate progress under CONSERVE.

During inception, the results framework will be further reviewed to ensure that these IPLC/TPLC-related indicators are clearly articulated and, where necessary, strengthened to explicitly reflect respect for governance systems, traditional knowledge integration, and tenure security throughout project implementation.

17 October 2025

1. FPIC has been expanded to explicitly include Tribal and local knowledge systems. The revised CEO-ER, ProDoc, and Indigenous Peoples Plan Framework (IOOF) now specify that any knowledge derived from TPLCs will follow FPIC processes consistent with the Biological Diversity Act (2002) and Nagoya Protocol. This ensures that TPLCs retain ownership, attribution, and benefit-sharing rights over their knowledge.

2. The table of Key risk now includes a summary of ESS-related risks and corresponding mitigation measures. Please refer to the ESS rick table on page 60-61 of the CEO ER.

Annex G: GEF Budget template
9.8 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
2025/09/23

1. The budget is very comprehensive but three rows stand out by the large sums and the paucity of detail:

- "Grant for implementation of 6 pilot" ($900,000)

- "Implementation contracts" ($3,000,000)

- "Investments in 3 pilot sites and technical buffer for additional investment needs and financial control" ($1,400,000).

What are these amounts?

2. It looks like there is a difference between the total for Component 1, Outcome 2 in the budget provided in Annex G ($1,977,308) and the total provided in the Project Description Overview table ($1,986,308). Please review all the numbers and correct them where necessary (see screenshots below).



Component 1: Strengthening Biodiversity Governance for improved ecosystem management	Technical Assistance	Outcome 2: Capacities for monitoring NBSAP implementation strengthened through the development of an	Output 2.1: A National biodiversity MIS portal established for monitoring and annual reporting on	GBFF	1,986,308.00	10,305,610.00

Grand Total- UNDP		3,369,925	1,977,308	0	414,731	5,761,964	123,750	294,736	6,180,450	
World Bank										

3. We noticed that ELEMENT Project and State Biodiversity Boards is the listed executing entity for most of the activities in the World Bank section of the budget table, but it is our understanding that this is a project and not a specific entity. Please specify which entity will be responsible for receiving funds from the GEF to execute each activity (note: the entity must match those included in the institutional arrangements).

World Bank										
Grants/ Sub-grants	Implementation contracts			3,000,000		**3,000,000**			**3,000,000**	ELEMENT Project and State Biodiversity Boards

4. Please move M&E items to the M&E component. Additionally, there are two items for M&E Experts, one that includes 2 positions for $10,000 and another item with 1 position for $15,000. Please add details for these positions so one can assess the budget difference.

2 M&E experts		10,000			***10,000***			**10,000**	NBA
1 training planner		7,500			***7,500***			**7,500**	NBA
2 training feedback consultants		12,500			***12,500***			**12,500**	NBA

1 M&E expert		15,000			***15,000***			**15,000**	NBA
1 senior policy consultant		7,500			***7,500***			**7,500**	NBA

5. Please present a row with the TOTAL amount (UNDP + World Bank) allocated to each component / M&E / PMC.

2025/11/10

1. Thank you. Based on the explanation you provided below, while you do not need to explain what activity is dollar is going towards (as I assume this would be decided during project implementation), you do need to account for how the funds will be allocated and disbursed. Please describe the decision-making structures to be established (e.g., a committee, composed of Z, Y and Z); whether specific vehicles/financing mechanisms will be set up; how the allocation of funds will be decided (will it be based on calls for proposals? Will the allocation process be competitive? What are the criteria for allocating grants/funds? What instrument (grants only, or also reimbursable grants, loans etc)? What are the eligibility criteria? What is the average ticket size?). Please add a financial flow chart to better understand how the funds will flow from the GBFF to the beneficiaries.

2. Thank you, cleared.

3. Please confirm that "ELEMENT" is also an institution and legal entity since a project cannot be an implementing agency.

4-5. Thank you, cleared.

2025/12/23

1. Thank you for this explanation. Please do provide this level of detail in the CEO ER and specify roughly what these funds will be spent on, as you did for the 900,000 budget line (in your reply above).

3. Thank you. This is cleared.

2026/02/05 Thank you very much for this. All points in this section are hereby cleared.

2026/02/13 Additional review by the team produced the following comments:

1. The following (2 technical writers/editors + 2 designers and 1 policy communication specialist) should be categorized as consultants, while 1 professional communication firm should be contractual services to company, not Other operating costs. Please revise.

Expenditure Category	Detailed Description	Component (USDeq.)								Responsible Entity
		Component 1		Component 2			Comp 3	Sub-Total	Comp 4 M&E	PMC	Total (USDeq.)	
		Outcome 1.1	Outcome 1.2	Outcome 2.1	Outcome 2.2	Outcome 3.1						
Travel	9 learning visits	30,000						30,000			30,000	NBA
Travel	Travel for participation in 2 global events		10,000					10,000			10,000	NBA
Travel	Annual monitoring visits for tracking GEF core indicators and technical visits							-	20,000		20,000	NBA
Office Supplies	Printers, printer cartridges, paper and stationery							-		8,000	8,000	NBA
Other Operating Costs	2 technical writers/editors + 2 designers	30,000						30,000			30,000	NBA
Other Operating Costs	1 professional communication firm	20,000						20,000			20,000	NBA
Other Operating Costs	1 policy communication specialist	15,000						15,000			15,000	NBA
Other Operating Costs	Printing and delivery of 200+ handover packages	15,000						15,000			15,000	NBA
Other Operating Costs	Development and printing of TWG mandates, membership, and governance arrangements	6,000						6,000			6,000	NBA
Other Operating Costs	Development , and printing of 6 policy briefs	8,000						8,000			8,000	NBA
Other Operating Costs	Design and printing of 4 updated toolkits		10,000					10,000			10,000	NBA

2. This line item 2 consultants (community engagement) for co-development of benefit-sharing frameworks with community endorsement should be categorized as consultants, not Training/workshop/meeting. Please revise.

Expenditure Category	Detailed Description	Outcome 1.1	Outcome 1.2	Outcome 2.1	Outcome 2.2	Outcome 3.1	Comp	Sub-Total	M&E	PMC	Total	
Trainings, Workshops, Meetings	3 workshops + 1 logistics and technical supervision package for pilot testing of biodiversity assessment tools in 3 landscapes			20,000				20,000			20,000	ELEMENT Project
Trainings, Workshops, Meetings	6 consultations for preparation of multi-stakeholder consultation reports			40,000				40,000			40,000	SPMU - ELEMENT Project
Trainings, Workshops, Meetings	3 meetings for formal endorsement of OECM plans			5,000				5,000			5,000	SPMU - ELEMENT Project
Trainings, Workshops, Meetings	2 consultants (community engagement) for co-development of benefit-sharing frameworks with community endorsement			10,000				10,000			10,000	SPMU - ELEMENT Project
Trainings, Workshops, Meetings	6 capacity-building workshops for OECM implementation support			30,000				30,000			30,000	SPMU - ELEMENT Project

3. Please standardize the expenditure categories across the two Agencies: contractual services ? company, grants/sub-grants, training/workshop/meeting.

4. Please change Audio visual and print production and Professional Services to Other operating costs.

Expenditure category	Sum of Total	Share
Audio visual and Print Production	53,500	0%
Contractual Services - Company	99,539	1%
Contractual Services – Company	181,235	1%
Contractual services-Company	1,487,425	12%
Contractual services-Individual	302,500	2%
Equipment	76,000	1%
Grants	900,000	7%
Grants/ Sub-grants	4,400,000	36%
Local Consultants	2,884,223	23%
Office Supplies	8,000	0%
Other Operating Costs	310,500	3%
Professional Services	5,000	0%
Salary and benefits / Staff costs	160,000	1%
Training, Workshops, Meetings	966,717	8%
Trainings, Workshops, Meetings	331,761	3%
Travel	212,500	2%
Grand Total	**12,378,900**	**100%**

5. Please add sub-total for each expenditure category in the budget table.

6. Please add a Grand total row which includes both WB and UNDP?s budget.

2026/02/23 Thank you, cleared

Agency Response
23 February 2026

1. Thank you for the clarification. The budget has been revised to ensure proper categorization in line with GEF guidance.

Specifically:

? The two technical writers/editors, two designers, and one policy communication specialist have been reclassified under the ?Consultants? category.

? The engagement of the professional communication firm has been reclassified under ?Contractual Services to Company? instead of ?Other Operating Costs.?

2. Thank you for the observation. The budget has been revised to ensure correct categorization in accordance with GEF guidelines.

The two consultants (community engagement) supporting the co-development of benefit-sharing frameworks with community endorsement have been reclassified under the ?Consultants? category, instead of ?Training/Workshop/Meeting.?

The updated Annex G reflects this adjustment accordingly.

3. Thank you. The mentioned expenditure categories (contractual ? company, grants/sub-grants, training/workshop/meeting as well as salary and benefits/staff costs) are standardized and aligned across the WB and UNDP.

4. The Audio visual and print production, and Professional Services are shifted to ?Other Operating Costs?.

5. Sub-total for each expenditure category is added in the GEF budget table.

6. The Grand Total row incorporating both WB and UNDP?s budget is added in the GEF budget table.

27 January 2026

We have now included the details of the major expenditure for Outputs 1.1.2 (USD 900,000), 2.1.1 (USD 30,000,000), and 2.2.1 (USD 1,400,000) as ?notes? in the Annex G of the CEO-ER.

Please note that these allocations are presented at a strategic and programmatic level at the CEO-ER stage. The finer operational details, including site-specific costing, sequencing of activities, procurement packages, precise tranche structures, and micro-allocation across participating community institutions, will be finalized during the inception phase through the preparation of detailed Execution Plans / Annual Work Plans (AWPs) for each output. These detailed plans will be:

? approved by the relevant governance bodies (National and State Steering Committees);

? aligned with FPIC processes, safeguards screening, and institutional readiness;

? consistent with UNDP and World Bank fiduciary requirements; and

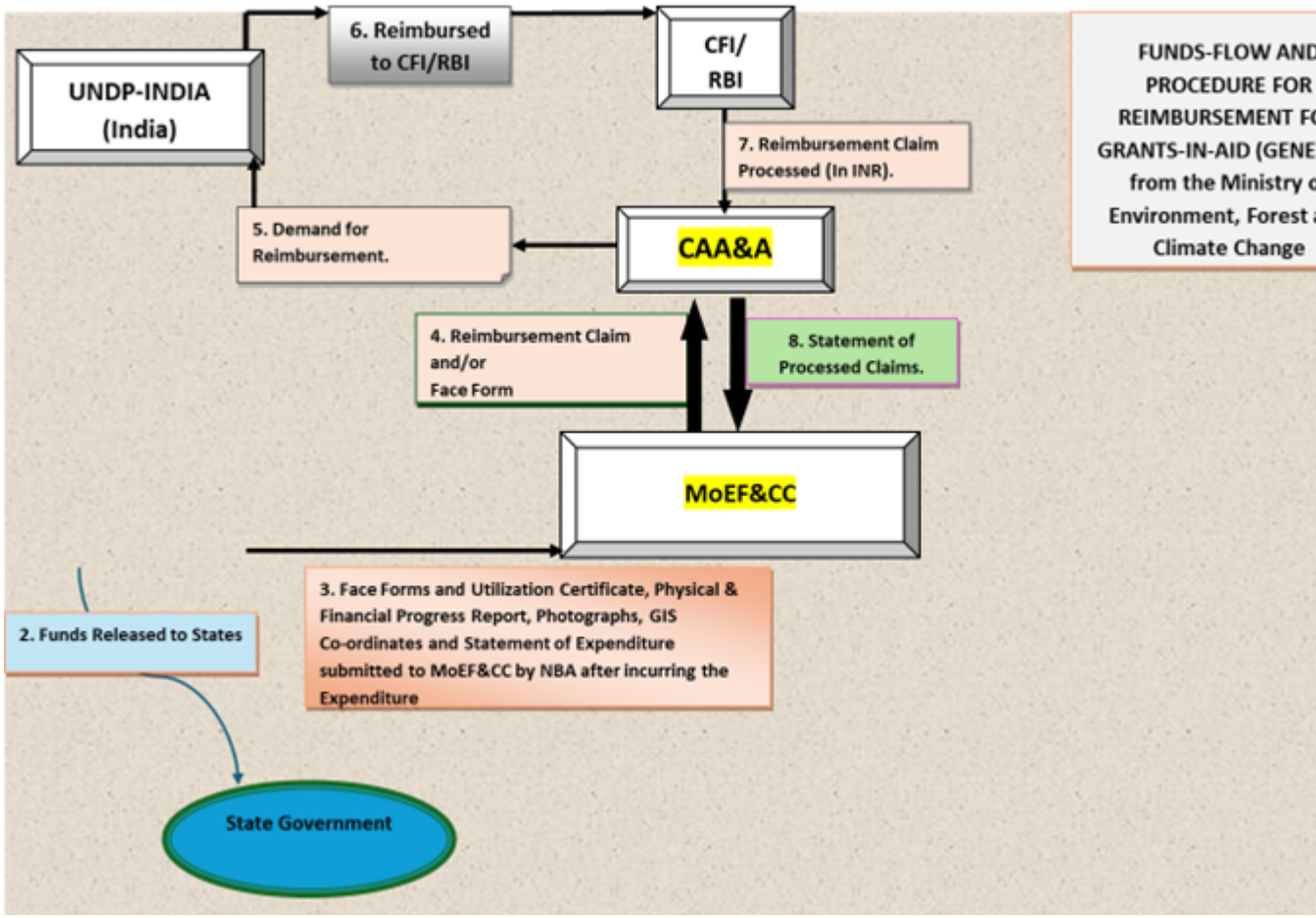
? subject to milestone-based disbursement and verification mechanisms.

Please refer to Annex G ? Budget table of GEf CEO ER (pg 93-97)

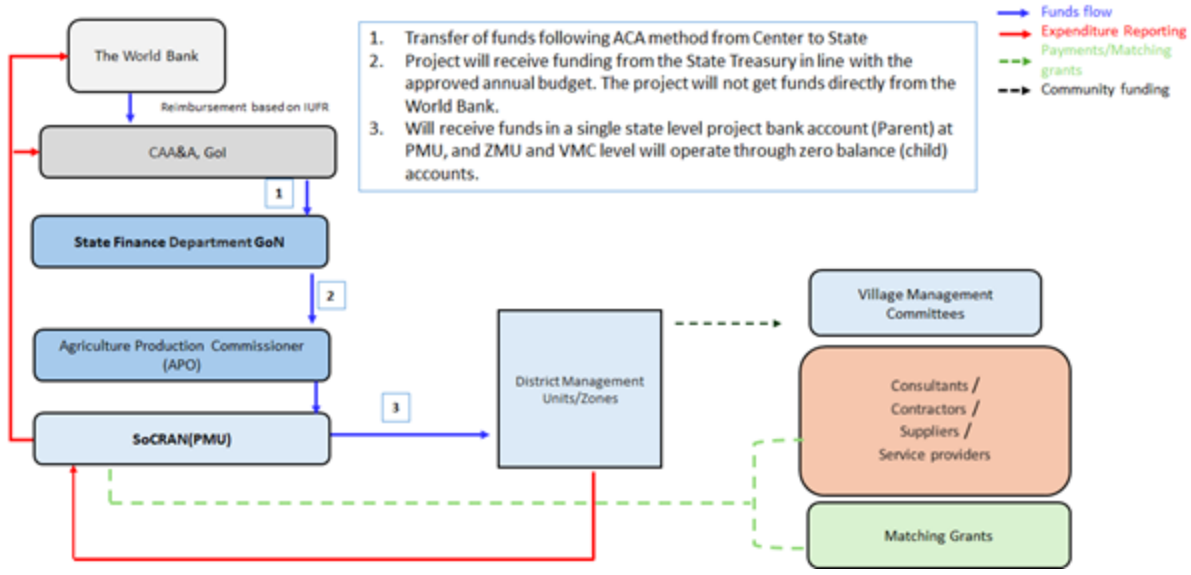
8 December 2025

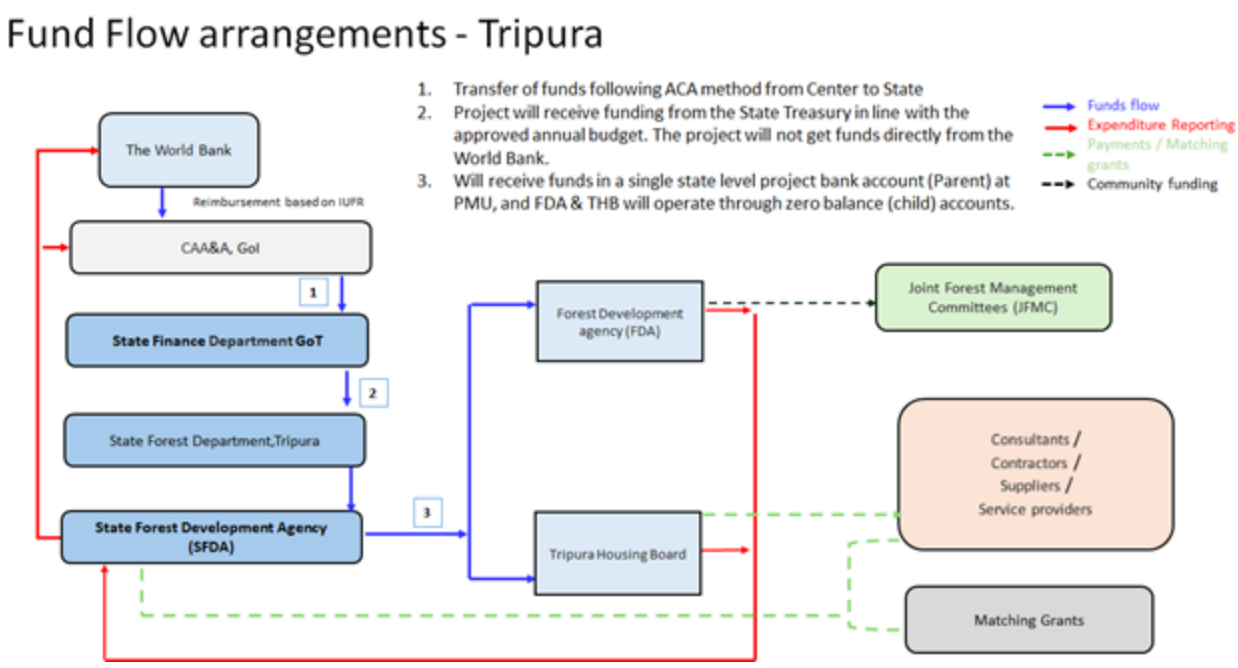
1. Thank you for the observation. We would like to clarify that the allocation and disbursement of the USD 5.3 million community-level budget will be governed through standardized national procedures. All fund allocation, appraisal, approval, and release processes will follow the existing government-recognized institutional procedures using National Implementation Modality (NIM) and Standard Operating Procedure (SOP) as per the Operational Manual of the ELEMENT project for World Bank executed components. .

The fund flow mechanism being followed under ELEMENT project in Nagaland and Tripura are given below:



Fund Flow arrangements - Nagaland





3.

Thank you for this clarification. We confirm that **ELEMENT** is not used as an ?entity? in the CEO-ER; rather, the reference pertains to the **State Project Management Units (SPMUs) of the World Bank?supported ELEMENT Project**, which *are* legally constituted entities under their respective State Governments.

To address the concern:

1. Legal status of ELEMENT SPMUs
Each SPMU has been **formally notified through a Government Order (GO)** operating as ?**legally recognized implementing and financial management unit?** under the concerned State Department (e.g., Department of Planning & Coordination in Nagaland, Forest/Environment Department in Tripura).
These SPMUs:

- ? have legally sanctioned administrative structures;
- ? maintain **government-authorized bank accounts** for receiving and managing external funds;
- ? operate under state treasury, audit, and financial rules;
- ? are already executing large-scale World Bank financing under the ELEMENT operation.

Therefore, the **SPMUs?not the ELEMENT project itself?are the responsible and eligible Executing Entities** for receiving GEF funds for Activities listed under the World Bank?implemented components.

2. Consistency with institutional arrangements
The CEO-ER now explicitly list:

- ? **Nagaland: ELEMENT State Project Management Unit (SPMU), Department of Planning & Coordination**
- ? **Tripura: ELEMENT State Project Management Unit (SPMU), Forest/Environment Department**

These entities are already reflected in the project?s institutional and fiduciary arrangements and fully comply with GEF and World Bank requirements for fund reception, management, procurement, and reporting.

Necessary explanation to this effect has now been provided on **page 51** of the CEO-ER

17 October 2025

1.

This response builds on the clarification already provided in Annex I: Response to STAP, Council, and GEF-SEC Comments, submitted as part of the CEO-ER, wherein the project strengthened its framework for community-led implementation and explicitly aligned a total allocation of USD 5.3 million with the GBFF?s aspirational target for IPLC/TPLC-led actions.

The three budget lines??Grant for implementation of 6 pilots? (US$ 900,000), ?Implementation contracts? (US$ 3,000,000), and ?Investments in 3 pilot sites and technical buffer for additional investment needs and financial control? (US$ 1,400,000)?represent direct, on-ground implementation expenditures under Outputs 1.1.2, 2.1.1, and 2.2.1 respectively. Together, these allocations amount to US$ 5.3 million, constituting approximately 43 percent of the total GBFF grant. These funds directly support Tribal Peoples and Local Communities (TPLCs) as the primary implementing partners, ensuring that the project?s biodiversity conservation objectives are realized through community-led action and inclusive governance mechanisms.

The US$ 900,000 under Output 1.1.2 finances grants to local community institutions such as Village Ecosystem Management Committees (VEMCs), Biodiversity Management Committees (BMCs), and Joint Forest Management Committees (JFMCs) across Nagaland, Tripura, and Uttarakhand. These funds will support pilot implementation of integrated conservation?livelihood models across approximately 195,000 hectares. Activities include participatory spatial planning, restoration of degraded habitats, sustainable harvesting of non-timber forest products, and development of biodiversity-friendly enterprises. Each pilot will be implemented under Free, Prior and Informed Consent (FPIC) principles, with 50 percent women?s participation, and will be jointly monitored through the Management Information System (MIS) developed under Component 1.

The US$ 3,000,000 allocated under Output 2.1.1 represents implementation contracts for five Other Effective Area-based Conservation Measures (OECMs) covering around 5,000 hectares. These funds will be channelled through Biodiversity Management Committees, traditional tribal councils, and VEMCs for on-ground conservation and management activities. Activities include biodiversity mapping, FPIC-based preparation and implementation of OECM management plans, institutional strengthening, and habitat restoration. Each OECM will have an inclusive governance platform with equal representation of women and TPLC members and will be formally recognized through state or national notification processes. These expenditures directly support the establishment and management of community-led conservation areas consistent with India?s OECM guidelines and GBF Target 3.

The US$ 1,400,000 under Output 2.2.1 supports the piloting of innovative biodiversity finance instruments, including, biodiversity or green credits, Access and Benefit-Sharing (ABS) mechanisms etc. This allocation will enable the design, testing, and initial capitalization of these financial models in three pilot landscapes managed by local cooperatives and community federations. The ?technical buffer? included in this amount ensures flexibility for scaling up successful instruments and maintaining financial oversight during implementation. At least 40 percent of direct beneficiaries of these mechanisms will be women or women-led groups, ensuring gender-responsive financial inclusion.

Together, these three allocations form the core investment package for community-led conservation, ensuring that local institutions are not passive recipients but active executors and co-financiers of biodiversity outcomes. Implementation will be performance-based, with fund releases linked to verified milestones and fiduciary safeguards. The expenditures are embedded in the national and state institutional frameworks (NBA, SBBs, and State PMUs under the World Bank?s ELEMENT project) to guarantee transparency, accountability, and long-term sustainability.

In summary, these three budget lines directly operationalize the project?s community empowerment, biodiversity mainstreaming, and sustainable finance pillars, ensuring that GBFF investments translate into tangible, verifiable conservation results on the ground.

2. The discrepancy has been rectified.

3. The ELEMENT Project referenced in the budget table represents the ongoing World Bank?financed ?Enhancing Landscape and Ecosystem Management (ELEMENT) Project, which is in Nagaland and Tripura and is implemented by specific entity. In Nagaland, it is implemented by establishing a Special Purpose Vehicle with its own Project Management Unit reporting to The Agriculture Production Commission of the State Government. In Tripura, ELEMENT is implemented directly by the State Forest Department.

Accordingly, for the GBFF?CONSERVE Project, the SPMUs of the ELEMENT Project in Nagaland and Tripura will serve as the Executing Entities responsible for receiving and managing project funds under World Bank?implemented components (Components 2 and 4). These SPMUs function under the administrative oversight of their respective State Governments through State Project Steering Committees and are legally authorized to receive and disburse project funds, enter into implementation contracts, and oversee fiduciary, safeguards, and procurement processes in accordance with World Bank and State Government procedures.

For Uttarakhand, where ELEMENT is not operational, a State-level Executing Entity will be designated?anticipated to be the Department of Forests or the Uttarakhand State Biodiversity Board (USBB)?to undertake equivalent fiduciary and implementation responsibilities. The funds under the UNDP components in Nagaland and Tripura will also flow to their respective State Biodiversity Boards, which are also specific entities.

At the national level, the National Biodiversity Authority (NBA) serves as the Implementing Partner for the UNDP-led components (Components 1, 3, and shared aspects of 4), overseeing fund transfers to State Biodiversity Boards (SBBs), monitoring implementation, and ensuring alignment with the National Biodiversity Strategy and Action Plan (NBSAP).

This structure ensures that the SPMUs-ELEMENT act as institutional vehicles, not separate legal projects, thereby maintaining clear fiduciary lines, compliance with World Bank and national financial management standards, and consistency with the institutional arrangements described in the CEO Endorsement Request.

4. The discrepancy has been rectified. The positions mentioned are for ?training experts? for evaluating the effectiveness of the training programs and not for M&E experts of the project.

5. The table has been updated.

Annex H: Blended Finance Relevant Annexes
9.9 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) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat comment at CEO Endorsement Request2025/09/23 N/A

Agency Response

Additional Annexes
10. GEFSEC DECISION

10.1 GEFSEC Recommendation
Is the project recommended for approval?

Secretariat comment at CEO Endorsement Request
2025/09/23 This is a very complete and comprehensive proposal. Two overall comments:

(i) The project structure is not clear and the number of components range from 3 to 5. This creates confusion when trying to understand the proposal and how it is structured; and

(ii) Perhaps because of this, it is not always clear what the project is trying to achieve - and where it is clear, the expected outcomes seem underwhelming. Greater clarity and consistency on key deliverables would be useful. For now, the myriad activities seem disparate and dispersed, with limited coherence. It might be useful to identify 2-3 key messages and organize the entire narrative around this core, and ramp up ambition wherever possible, particularly on financial aspects and the exit strategy. As one of the GBFF's largest projects, greater ambition and impact are expected.

We look forward to receiving the next version.

2025/11/10 Thank you very much for this resubmission. Many of the comments have been addressed and we encourage you to resolve the outstanding issues.

2025/12/23 Thank you very much for all the additional explanation provided. A handful of minor comments remain, with the co-financing issue remaining the only major issue to be resolved. Should you encounter any challenges or queries on this point, please do reach out and request a meeting to discuss and find solutions together. Looking forward to the next iteration of this proposal.

2026/02/02 Thank you for this resubmission. All points have been resolved with the exception of the co-financing letters. As agreed in our email exchanges, you will share these letters as soon as you receive them; in the meantime, we will proceed with finalizing the review based on the assumption that the letters will be provided in time.

2026/02/13 Further review by the team, as is standard at this stage of the project cycle, revealed some additional comments, notably in the sections on gender, co-financing, budget and ESS sections. Please address these points and resubmit at your earliest convenience, with or without the co-financing letters which as agreed you will share separately.

2026/02/13 Thank you very much. I note the co-financing letters remain outstanding. We look forward to receiving them as soon as possible.

2026/04/06 I note that the co-financing that was not backed up by co-financing letters has been removed from the CEO ER.

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

Secretariat comment at CEO Endorsement Request

10.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	**9/23/2025**	**10/17/2025**
Additional Review (as necessary)	**11/10/2025**	**12/8/2025**
Additional Review (as necessary)	**12/23/2025**	**1/27/2026**
Additional Review (as necessary)	**2/5/2026**	**2/23/2026**
Additional Review (as necessary)	**2/13/2026**	