

MID-TERM REVIEW

Project ID:	10375
Project Name:	Blue Nature Alliance to expand and improve conservation of 1.25 billion hectares of ocean ecosystems
Countr(ies):	Global
Implementing Agency:	CI

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I. Overview

A. Description

Project name

Blue Nature Alliance to expand and improve conservation of 1.25 billion hectares of ocean ecosystems

Country

Global

GEF ID

10375

Implementing Agency

CI

Executing Entity

Blue Nature Alliance

Trust Fund

GET

Project Type

FSP

Objective

To catalyze the conservation of 1.25 billion hectares of ocean ecosystems, to safeguard biodiversity, help build resilience to climate change, promote human well-being and enhance ecosystem connectivity and function.

B. Key Dates

CEO Endorsement/Approval

9/3/2021

Agency Approval

12/12/2019

Implementation Start

10/5/2021

First Disbursement

7/31/2023

Expected MTR

5/1/2024

MTR Submission

8/15/2025

Actual MTR

5/1/2024

Expected Completion

4/30/2027

II. PROGRESS STATUS AND ISSUES

A. Main MTR Findings

This Mid-Term Review (MTR) of the GEF-funded Full-Sized Project *Alliance to Expand and Improve Conservation of 1.25 billion Hectares of Ocean Ecosystems* was conducted at the request of the CI GEF Agency. MTRs are a contractually

required step within the overall Monitoring & Evaluation (M&E) process for GEF-funded projects. The MTR covers the period from September 2021 until August 2024, and is based on document review, group discussions, semi-structured interviews with key stakeholders, and two site visits.^[1]

Project Description

The ocean is vital for all life on this Earth. It regulates the climate, produces the oxygen we breathe, and determines our weather cycles. It contains the largest animals and the most diverse ecosystems on our planet. The ocean is also intrinsically linked with human development, providing food and economic opportunities for billions of people. Maintaining a healthy ocean is critical to achieving most of the United Nations Sustainable Development Goals (SDGs), including most notably the goals related to eliminating poverty (1), eliminating hunger (2), climate action (3), and the dedicated ocean goal on life below water (14). However, anthropogenic pressures and threats to ocean health are unprecedented and mounting. Habitat loss, fishing pressure, climate change, and pollution are leading threats to ocean health globally.

The International Union for Conservation of Nature (IUCN) passed a resolution at the 2016 World Conservation Congress calling for the designation and implementation of at least 30% of each marine habitat in a network of highly protected MPAs and other effective area-based conservation measures by 2030, subject to the rights of Indigenous peoples and local communities. The Global Environment Facility's (GEF) International Waters Focal Area Strategy similarly recognizes the need to establish and support existing MPAs in key biodiversity hotspots and coastal habitats in order to rebuild and protect essential habitats. As of January 2021, only 7% of the ocean was under some form of designated protection, including approximately 6.4% in implemented MPAs and only 2.6% classified as highly or fully protected (MPAtlas).

Conservation International (CI), the Pew Charitable Trusts (Pew), the Minderoo Foundation, the Rob Walton Foundation, and the Global Environment Facility have joined together to form the Blue Nature Alliance (the Alliance) with the objective to catalyze the effective conservation of at least 1.25 billion hectares of ocean in order to safeguard global ocean biodiversity, build resilience to climate change, promote human wellbeing, and enhance ecosystem connectivity and function. By directly supporting the conservation of at least 1.25 billion hectares of ocean ecosystems (approximately 3.5% of the global ocean), this project intends to help deliver SDG14 Target 5 of protecting 10% of the global ocean and build momentum towards the Global Biodiversity Framework goal of protecting 30% of the global ocean by 2030. The approach of this project is to invest resources to:

- catalyze the establishment of at least 750 million hectares of new or expanded ocean conservation areas;
- support the strengthening of at least 500 million hectares of previously established ocean conservation areas through upgraded protection levels and/or improvement to management effectiveness;
- develop new science, tools, capacity, and innovations directly related to the fields of large-scale and transboundary ocean conservation in order to establish the global enabling conditions necessary to reach the global goal of protecting 30% of the world's oceans.
- cultivate the global enabling conditions required to reach the ambitious goal of protecting 30% of the ocean, including scientific research, knowledge management, capacity building, and learning initiatives to advance large-scale and transboundary ocean conservation.

Project Progress Summary

Outcome 1.1 of the project design was critical to initiate implementation by developing a portfolio of site engagements. Despite the challenges of COVID, the Alliance team successfully advanced with desk assessments and scoping of potential sites, exceeding the project targets for these steps as well as subsequent preparation of engagement frameworks (27 versus a target of 25) and securing of Steering Council endorsement of engagement sites (27 versus a target of 20). This means that the Alliance is, as of August 2024, actively engaged in work with implementation partners over an area of 1.06 billion ha for new ocean conservation areas (Outcome 2.1), as well as 1.06 billion ha for upgraded protection and/or improved management (Outcome 3.1). Considerable progress remains needed to achieve targets for Outcomes 2.1 and 3.1 (117M of 750M hectares [15.6%] and 87M of 500M hectares [17.4%] achieved to date respectively). However, this may be expected, as the first part of the implementation period focused on site identification and engagement leading to multi-year site engagements, with activities towards targets now advancing such that establishment, upgrading, and/or improved management of sites will be concentrated in the second half of the implementation period. As the project already is active over a total area of 2.12 billion ha, there is justified confidence in its ability to achieve its area targets.

The project already has substantially exceeded targets with respect to knowledge generation and dissemination (Outcomes 4.1 and 4.2), including for research projects supported, peer-reviewed publications produced, learning participants reached, new tools and innovations disseminated, organizations engaged, and presentations delivered, as well as materials to be shared through IW:Learn. The project can be expected to outperform on these fronts even further during the remainder of implementation. The project has recorded over 12,700 direct beneficiaries (35% women), well over half the target of 20,000. Finally, in addition to the \$115.4 million co-financing in hand prior to the start of the project start, an additional \$426 million in funding has been leveraged across Alliance site engagements. Thus, the project is well positioned to achieve and surpass its targets by the end of the implementation phase.

Evaluation Ratings & Achievement Summary Table

Dimension	Rating	Achievements
Project Outcomes (overall)	Satisfactory	- Outcome 1.1: 27 engagement frameworks endorsed, versus target of 20. (All Output targets exceeded.) - Outcome 2.1: Full or partial target reached in 29% of engagement sites, totaling 116.97 M hectares, versus target of 750 M hectares. - Outcome 3.1: Full or partial targets achieved for management effectiveness improvement and/or proposed status upgrade in 20% of engagement sites, totaling 87.28 M hectares of ocean conservation area, versus target of 500 M hectares. - Outcomes 4.1 & 4.2: All Output targets exceeded (noting that targets for IW:Learn contributions readily will be met/exceeded following the resumption of IW:Learn activities). 12,700 direct beneficiaries (35% women) reached, versus target of 20,000.
Relevance	Highly Satisfactory	
Effectiveness	Satisfactory	
Efficiency	Satisfactory	
Sustainability	Moderately Likely	- Sustainability of project outcomes benefits from alignment with country goals (e.g., GBF 30x30), existing networks and commitments (e.g., funders, MPA managers), and capacity building - Support for addressing financial sustainability at site level is tailored to the site's status along the conservation journey. - McKinsey & Company pro-bono support secured for site financing assessments and strategies.
Project M&E	Satisfactory	Outcome 5.1: Project M&E on track.

		• ProDoc included concrete, fully budgeted M&E plan, aligned with Results Framework and using SMART indicators, including GEBs, socioeconomic co-benefits, and sex-disaggregated indicators. • Dedicated M&E capacity in place and operational, actively measuring indicators relative to baseline. • Continuous refinement of M&E processes and guidance, reducing reporting burden on sub-grantees.
Implementation and Execution	Satisfactory	• Securing co-financing for GEF Alliance investment as a whole has been a significant value add from the perspective of supported sites. • GEF participation as a Core Partner and Steering Council member has facilitated ongoing alignment. • Structure of the Alliance as a new entity with support from Executing Core Partners CI and Pew has incubated an effective and efficient institutional culture, marked by responsiveness to site partner needs and openness to input and feedback. • Flexibility and adaptive ability of the Alliance management team permitted significant progress on Outcome 1.1 despite challenges of the COVID pandemic and has been instrumental to ongoing streamlining and refinement of processes (e.g., site safeguard plans, financial reporting).
Environmental and Social Safeguards	Satisfactory	• Templates and manuals provided to sites, accompanied by direct support/guidance. • Project-level GMP, SEP, and AGM developed. • As of FY24 PIR, Limited ESIA's, safeguards screenings, stakeholder engagement plans, gender mainstreaming plans, and grievance redress mechanisms have been completed for all engagements in implementation. • Safeguard processes updated in early 2024 to enhance efficiencies and reduce burden on sub-grantees.

Summary of conclusions

During the first half of its implementation phase, the Alliance has built a strong institutional culture, refined its organizational processes, and exceeded expectations in developing a diverse portfolio of supported initiatives and contributing to the global knowledge base relating to marine conservation. The Alliance offers clear and considerable added value within the global marine conservation arena. Beyond serving as an important funding mechanism, it is uniquely impactful in terms of aligning the efforts of a large and diverse range of actors and strengthening the global community of practice.

The Alliance has a clearly articulated theory of change that can be summarized by the Alliance's concept of a Conservation Journey. Different sites are at different points on this journey when they join the Alliance; the project's aim is to see progress along this journey for each site, while recognizing that Alliance will not be able to support each site through the entirety of its journey. The Alliance thus serves as an accelerant and considers what aspects they meaningfully can help advance in a site to leave lasting impact.

Adapting to reflect lessons learned during implementation is a particular strength of the project. The Alliance team is open to input and actively strives to improve on the basis of that input. A notable feature of the Alliance has been the ongoing innovation of processes, including: new safeguard templates that depend on level of risk; new customized project management system and online grantee reporting tool; and streamlined M&E indicators, reporting requirements, and new dashboards.

Implementers of projects supported by the Alliance highlighted the engagement and reachability of their regional contact points as a trusted source of input, guidance, and support. There was broad consensus among informants that the Alliance team is highly responsive and positive. The Alliance is explicit about its culture and values in its Code of Conduct, and the team holds itself to high standards and has created a culture of respect and collaboration. These interactions extend beyond those seen under a typical grant-making entity and embody a true partnership dynamic. Informants also almost universally noted the flexibility of the Alliance as a grantor or partner, open to working closely with project implementers or co-financing partners to tailor project designs, processes and arrangements.

Project implementers also noted the value of access to Alliance's technical expertise, particularly in the areas of innovative/sustainable financing; surveillance (e.g., Skylight); scientific expertise (e.g., baseline studies); policy engagement and access to policymakers; networking and exposure facilitated by the Alliance (including site exchanges, side-events at conferences, and access to other donors); and the overall strategic coordination and convening role that the Alliance plays (e.g. supporting regional networks and connecting them to each other, and convening donors to coordinate investments).

The evaluation revealed few challenges or weaknesses of note. Most project implementers described the grant-making process as long (though not necessarily more onerous than for other comparable funders). Implementers that described processes as onerous also stated that the Alliance was understanding and supportive (e.g., reflected in Alliance staff providing guidance and input on budget template, safeguards, etc.). Some implementers noted that reporting – particularly financial reporting – remains a burden. Issues raised included frequency of reporting, changes in reporting expectations and requirements over time (attributed to turnover in Alliance finance/admin staff), the budgeting process during project design, and scope for/requirements relating to grant extensions and renewals. A few sources shared that the Alliance could benefit from more exchange with and input from other actors and/or a wider range of voices in the global marine conservation space. This could include, for example, other thought leaders in the marine conservation space. The Alliance can offer a rich set of learning experiences through interactions between the many and diverse initiatives that constitute the Alliance's portfolio of supported projects. Although some informants highlighted specific exchanges that they much appreciated, others indicated that they experienced little in the way of cross-project fertilization. Some implementers did not seem entirely aware of the full range of resources and support potentially available to them through the Alliance.

A recurring topic of discussion throughout the evaluation process was the question of appropriate targets and priority setting. This relates to the value of ambitious total area targets for new and/or improved MPAs and ocean conservation areas versus a set of targets that better capture the quality of conservation management of such areas; the balance between strict protection and areas available for sustainable use; and the balance between pursuing large MPAs to achieve ambitious targets versus supporting small ocean conservation areas (including MPAs and OECMs) in areas with particularly high biodiversity value and/or levels of threat. This discussion remains unresolved, and likely will resist definitive universal answers.

Another unresolved topic revolves around optimal strategies for growing the field. Some informants noted that the needs of MPA managers were not always at the forefront of the Alliance's work and that products were more relevant for NGOs than MPA managers, while others stated that MPA manager voices were clearly at the table and products reflected these voices. Similarly, there were differing views of what kinds of tools would be most useful for Blue Nature Alliance to develop, and the appropriate balance between customized approaches for individual MPAs and

simple, readily available tools. A related discussion concerned the difficulty of measuring the impact of capacity building and thus conveying its fundamental importance to funders that are focused on area targets. The Alliance clearly understands the value of this work and can play a role in articulating its impact. Blue Nature Alliance has a well-developed strategy around capacity and learning and there is an opportunity for the Alliance to facilitate a shared global vision in this space.

As noted earlier, Blue Nature Alliance has innovated considerably in many areas. Given that many of these innovations have been deployed within the past 3-6 months (safeguards, M&E, project management, reporting), it is too early to evaluate the impact of these changes. It is expected that the value of these efforts will be observed in the second half of the project.

Recommendation Summary

Corrective actions for the design, implementation, monitoring and evaluation of the project

The evaluators did not find a need for material corrective actions. The overall project design, including adaptations applied over the course of implementation, are appropriate to the aims of the project; the Blue Nature Alliance team is functioning effectively and site implementers are universally satisfied with their interactions with and support from the Alliance; and project monitoring and evaluation is effective and also is benefitting from ongoing refinement.

Recommended actions to follow up or reinforce initial benefits from the project

- Create an information packet (i.e., a simple factsheet or brochure) enumerating the types of technical support available to partners through the Alliance, and periodically run through the available types of support with implementers.
- Explore ways to further increase the amount of cross-fertilization between projects and proactively seek to catalyze more and deeper project-to-project linkages, such as exchanges and curated virtual interactions, in addition to facilitated side-events at major conferences.
- Explore opportunities for more interaction and exchange with relevant outside actors, platforms, etc.
- Continue to identify opportunities to improve and streamline, for example, grant-making processes and reporting requirements, and seek out opportunities for clearer and simpler templates and guidance documents that lay out timelines, processes and requirements (e.g., requirements and procedures for grant extensions and grant renewals).
- Explore ways to reduce the need to enter the same information multiple times for grant reporting (i.e., through the CI grants portal) by streamlining templates or automating the transfer of information from one section/template to another. Although the Blue Nature Alliance has made notable strides in simplifying reporting requirements, duplication of information remains a point raised by some implementers.
- Document the gains/benefits from process improvements to date.
- Reach out to solicit concerns, suggestions and other input from partners and implementers, as proactive efforts to collect feedback from partners (e.g., assess performance of and satisfaction with revised safeguard processes to inform further possible refinements).

- Document examples of best-practices and lessons learned related to gender, including how the project has enhanced women's leadership and meaningful participation in decision-making spaces and processes. Better reflect this theme in reporting.
- Put greater emphasis on the value of considering (financial) sustainability as early as possible in the Conservation Journey.
- Assuming an intention to seek a second phase for the Blue Nature Alliance, articulate a financial sustainability plan for the Blue Nature Alliance itself, to sustain the Alliance's ability to continue efforts relating to regional networks and capacity building as well as site support and growing the field.^[2]

Proposals for future directions underlining main objectives

- Consider a target for improved management outside protected areas (corresponding, for example, to the Seychelles effort to apply Marine Spatial Planning (MSP) throughout its Exclusive Economic Zone (EEZ), not just protected areas).
- Capture avoiding degazettement or weakening of management regimes in regular reporting. Consider developing a form of early warning & response framework for protected area degazettement or downgrading, to then measure success against threats identified through this framework.
- Include in the knowledge management and communications strategy a deliberate plan to articulate and demonstrate how investment in capacity building advances global marine conservation, and prepare effective communication material that conveys how the Growing the Field component of Blue Nature Alliance's work is conceived and operates.

^[1] Note that the scope of the Alliance is substantially larger than the GEF investment covered by this MTR. The Alliance as a whole works with more than 100 partners around the world in 161 ocean conservation areas, covering 21.9 million km² of ocean ecosystems. Stated impacts achieved to date include 1,857,000 km² of ocean under new or expanded protection, 685,000 km² of ocean under upgraded protection, and 187,000 km² of protected ocean under more effective management (see <https://www.bluenaturealliance.org/what-we-do/impact/>).

^[2] As currently articulated on, for example, the Blue Nature Alliance website, the Alliance is a time-bound initiative scheduled to close in 2028. However, many interviewees (including implementers, Blue Nature Alliance team members, co-funders and other partners) signaled a strong appetite for a second phase. Given the strong track record of achievements and the successful deployment of a highly effective structure and team, the evaluation team believes a second phase merits strong consideration.

B. Stakeholder Engagement

Incorporation of lessons in project design

The Blue Nature Alliance GEF project design process benefited from early experiences accumulated following the launch of the Alliance in 2020, and application of these lessons clearly bore fruit:

- Meaningful partnership takes work, requiring considerable investment of time and effort in relationship-building. Interviews with site implementers and co-funders conveyed a clear sense of success on this front, with universal appreciation for the Alliance's openness, flexibility, and dedication to communication. Ongoing

collaboration and partnership dynamics facilitated by regional contact leads were highlighted repeatedly as a strength of the Blue Nature Alliance.

- The ProDoc cited the importance of aligning around shared goals for sites and then flexibly executing. The Alliance has embraced this as a core operating approach by dedicating more upfront effort during the scoping process to alignment around a shared goal with a single or a few lead implementing partners and adjusting its site engagement strategy to maintain more flexibility during implementation. This flexibility was noted by several interviews as a significant advantage and strength of the Alliance.
- The ProDoc emphasized as a lesson the power of “Leading from Behind,” providing support and managing communications in such a way as to highlight the successes of partners rather than promoting the Alliance itself. For example, Birdlife International noted this as a key factor in their ability to successfully engage governments and intergovernmental bodies in the NACES project.

Project Outcomes

However, the Project Document did not reflect analysis or application of lessons learned from other GEF projects. Although arguably this reflects the fact that the Alliance investment is somewhat unique, there have been a number of GEF investments in mechanisms involving support to portfolios of projects, with examples including support for Critical Ecosystem Partnership Fund, the Conservation Agreement Private Partnership Platform, and the Inclusive Conservation Initiative, as well as GEF’s own Impact Programs and Integrated Programs, which might have been examined for lessons learned relating to site selection, safeguard requirements, reporting processes, and other aspects. That said, the Alliance has benefited from ongoing communication with initiatives such as the Inclusive Conservation Initiative and Critical Ecosystem Partnership Fund over the course of the project to share best practices and lessons learned relating to grant making.

The Blue Nature Alliance has achieved marked progress on its Outcomes per the logic of its theory of change reflected in the project design: initiate a set of site engagements (Outcome 1.1) that lead to either new ocean conservation areas (Outcome 2.1) or upgraded protection and/or improved management of previously established ocean conservation areas (Outcome 3.1); reinforce these advances through scientific research (Outcome 4.1, supported with co-financing) and knowledge management and learning (Outcome 4.2); and verify execution with an effective M&E framework (Outcome 5.1).

Effective delivery of Outputs has directly contributed to each of these outcomes (see Section 3.2 below), in most instances exceeding targets. Moreover, explicit consideration of alignment of potential site engagements with national policies (e.g., national commitments to the 30x30 GBF target) in scoping and feasibility assessments under Outcome 1.1 ensured government support that contributes to achievement of Outcomes 2.1 and 3.1, and responsiveness to site-based demand for research, knowledge products, and learning opportunities contributes to success on Outcomes 4.1 and 4.2. Further contributing factors to successful Outcomes include the core functioning of the Alliance as a set of true collaborative partnerships, highly responsive regional engagement leads, targeted technical support, and ongoing adaptive management and process improvement, as discussed elsewhere in this report.

Concretely, Outcome 1.1 of the project design was critical to initiate implementation by developing a portfolio of site engagements. Despite the challenges of COVID, the Alliance team successfully advanced with desk assessments and scoping of potential sites, exceeding the project targets for these steps as well as subsequent preparation of

engagement frameworks (27 versus a target of 25) and securing of Steering Council endorsement of engagement sites (27 versus a target of 20).

This means that the Alliance is, as of August 2024, actively engaged in work with implementation partners over an area of 1.06 billion ha for new ocean conservation areas (Outcome 2.1), as well as 1.06 billion ha for upgraded protection and/or improved management (Outcome 3.1). Considerable progress remains needed to achieve targets for Outcomes 2.1 and 3.1 (117M of 750M hectares [15.6%] and 87M of 500M hectares [17.4%] achieved to date respectively). However, this may be expected, as the first part of the implementation period focused on site identification and engagement leading to multi-year site engagements, with activities towards targets now advancing such that establishment, upgrading, and/or improved management of sites will be concentrated in the second half of the implementation period. As the project already is active over a total area of 2.12 billion ha, there is justified confidence in its ability to achieve its area targets.

1.1.1 Management Arrangements

Blue Nature Alliance project implementation benefits from effective and motivated leadership, and highly engaged and innovative staff. Interviews with project staff reflected a knowledgeable and committed team working through management arrangements that effectively facilitate communications and coordination between team members. While there are standing calls to ensure alignment, it appears that there is near continuous ongoing dialogue across the team, led by core management team leadership, to the benefit of all the site initiatives that it supports. Thus, the Alliance functions as a well-orchestrated mechanism.

A key aspect of the management arrangements is the role of the regional engagement leads, who serve as effective liaisons between site implementers and the Alliance as a whole. Without exception, site implementers in interviews emphasized how much they value these roles and the specific individuals in those positions for their respective regions.

Arrangements themselves reflect pragmatism and balance, ensuring coordination while avoiding ‘meetings for the sake of meetings’. The Core Team convenes weekly, while Delivery Teams organized by subject area to deliver specific activities and outputs meet as needed (see Annex 7). Delivery Teams have been created for the following areas:

- Site Engagement
- Science & Research
- Monitoring & Evaluation
- Conservation Finance Strategy
- Communications
- Finance and Operations
- Capacity Development and Learning
- Global Policy and Advocacy

The fact that the functioning of the Alliance management team requires coordination and integration between two large organizations (CI and Pew) makes its success all the more noteworthy. As discussed with Alliance leadership and others, CI and Pew are quite different institutions in terms of organizational culture, strategic approaches, prioritization of objectives, and metrics of success. Blending aspects of these two institutions successfully has resulted

in the Blue Nature Alliance as a new body with its own distinct culture and identity, allowing the Alliance to organically mature into its own effective management arrangements that enjoy strong institutional commitments from both CI and Pew.

Implementation

The Blue Nature Alliance reports that their counterparts at CI GEF Agency have been very helpful and responsive, and that they have created an effective, collaborative culture and team dynamic. The relationship has been conducted more as a partnership than as one focused on oversight, with an open and supportive approach when issues or knowledge gaps have arisen. The CI GEF Agency team's ability to draw on a broad set of experiences with other projects to inform thinking on how to handle issues is a particular strength. Guidance and support during the project design process was extremely valuable, together working through the distinct aspects of GEF joining the alliance as a Core Partner (compared to the more typical instance of GEF supporting projects as the principal funding source) and navigating a project portfolio that includes both GEF-supported and non-GEF supported sites. Subsequently, CI GEF Agency feedback and input on project reporting and adjustments have been constructive and helpful, for example in revisiting the target for number of direct beneficiaries of the project.

Notable areas where CI GEF Agency has been a constructive thought partner include Blue Nature Alliance's efforts to accommodate streamlined reporting and safeguards processes, though noting that safeguards remain a challenge at times. As also indicated by some implementing partners, GEF safeguard requirements are not well-aligned with the context of many ocean conservation sites. This can place CI GEF Agency in a difficult position when trying to maintain adherence to GEF requirements while helping the Alliance adapt safeguard processes to site realities. As Implementing Agency, CI has been an appreciated partner in exploring the scope for flexibility and modification of these safeguard processes.

Implementation rating: Satisfactory

Execution

The Blue Nature Alliance Core Team and supporting network (see Annex 7) have been effective in discharging their role and responsibilities. Management of day-to-day activities is grounded in a strong Core Team, clearly defined operational roles, functional thematic working groups, and regular communications amongst all parts of the management structure. Benefiting from time-tested processes and procedures of CI's finance, grant and contract administration structures, the Alliance has been well able to ensure appropriate use of funds and procurement of goods and services. This is confirmed through financial reporting as well as audit findings. Quality of Blue Nature Alliance execution further is reinforced through effective regional leads and dedicated attention to ongoing refinement of Alliance-wide progress tracking and monitoring and evaluation provisions.

Execution rating: Satisfactory

Project-level Monitoring and Evaluation Systems

The Alliance is responsible for initiating and organizing key monitoring and evaluation tasks, including the project inception workshop and report, quarterly progress reporting, annual progress and implementation reporting, documentation of lessons learned, and support for and cooperation with the independent external evaluation exercises.

The Blue Nature Alliance Steering Council plays a key oversight role for the project, with regular meetings to receive updates on project implementation progress and approve annual workplans. The Steering Council also provides continuous ad-hoc oversight and feedback on project activities, responding to inquiries or requests for approval from the Management Team.

The CI-GEF Project Agency plays an overall assurance, backstopping, and oversight role with respect to monitoring and evaluation activities.

The CI General Counsel's office with the Grants and Contracts Unit are responsible for contracting and oversight of the planned independent external evaluation exercises at the mid-point and end of the project.

Stakeholder Engagement

The Alliance prepared a project-level Stakeholder Engagement Plan (SEP) with the Project Document, and all site engagements must prepare a site-level SEP. The Blue Nature Alliance designed three strategies to meet the goals for stakeholder engagement:

1. Develop a Code of Conduct to guide and facilitate the integration of human dimensions into their activities, site engagement processes, and during ongoing implementation.
2. Work with local partners that have close relationships with key stakeholders and proven track record of inclusivity, and that are well-positioned to apply their in-depth knowledge to develop a quality Stakeholder Engagement Plan.
3. Invest time and resources in site development processes that carefully considers the full spectrum of stakeholder groups, with a special focus on marginalized groups, primary rights holders, and Indigenous groups. The Alliance's Safeguards and Gender Manager will review stakeholder assessments and engagement plans at multiple points in the site development process and provide guidance and scoping trips and workshops will be conducted with stakeholders in project sites in order to develop workplans with the full engagement and input from key stakeholders.

The Blue Nature Alliance annual workplans contain 5 activities related to the SEP:

- Review and monitor portfolio of project sites in scoping and implementation phases to identify and plan for any high-risk situations such as social conflict or high rates of GBV. Keep record of all sites engaging with the Alliance to ensure each one has developed the required safeguard plans and implements safeguard actions appropriately during implementation.
- Review all Engagement Frameworks, proposals and Stakeholder Engagement Plans to ensure that stakeholders have been identified, informed, and provided with information regarding planned activities and that any potential adverse impacts have been mitigated.
- Where grants involve activities that are likely to generate adverse social or environmental impacts to local or indigenous communities, ensure that the applicant develops and implements an Indigenous Peoples Plan, either as a stand-alone plan, or incorporated into the documentation of the required Stakeholder Engagement Plan.

- Monitor compliance of grantees, including through semi-annual safeguard monitoring reports and, when possible, site visits to high-risk grants.
- Monitor and report on CI-GEF minimum indicators.

The minimum indicators, targets, and current status for stakeholder engagement are as follows:

Indicator	Target	Current status
Number of government agencies, civil society organizations, private sector, indigenous peoples and other stakeholder groups that have been involved in the project implementation phase.	The project sets a target for all engagement sites to complete a stakeholder engagement plan which outlines a project specific target for the number of stakeholder groups to be involved in the project implementation.	1,343 stakeholder groups involved
Number persons (sex disaggregated) that have been involved in project implementation phase.	The project sets a target for at least 33% of persons involved in the project implementation phase to be women.	8,297 people (55% men, 39% women, 6% unknown)
Number of engagements (e.g. meeting, workshops, consultations) with stakeholders during the project implementation phase.	The project sets a target for all site engagements in implementation to develop a stakeholder engagement plan which outlines site specific plans for the engagement and consultation of stakeholders during the implementation phase.	3,292 engagements with stakeholders

The project level Stakeholder Engagement Plan and the reviewed site stakeholder plans (as well as the annual workplans) indicate that stakeholders were consulted in project design and implementation. Given the nature of many of the Alliance's projects (i.e., remote MPAs) there are sometimes limited opportunities to engage with stakeholders and stakeholder engagement plans are adjusted accordingly to include with a fit-for-purpose and realistic stakeholder engagement approach. Given that aggregate targets have not been set for stakeholder engagement (apart from the gender target for persons involved in the project implementation phase), it is not possible to assess the total number of engagements, people, or stakeholder groups against a target. However, the numbers seem reasonable for the size and scope of the project at midterm. A full review of all site SEPs and assessment of progress towards targets was not possible under the scope of this MTR. Given that there have been no grievances put forth in project sites, and all persons interviewed for the MTR were predominantly positive about the project's stakeholder engagement, there is no evidence to date that stakeholder engagement is lacking. The level of satisfaction among stakeholders was deemed high, on the basis of interviews that probed stakeholder perspectives on what the Alliance has done well and any challenges encountered in their interactions with the Alliance; widespread desire for continued engagement and continued Alliance work beyond the current phase also can be taken as an indication of high satisfaction among stakeholders.^[1]

^[1] Per request from CI GEF Agency, the evaluators distributed a short survey to interviewed stakeholders. Although the response rate to the survey was within the norm for such exercises, the structure of the criteria and the nature of the scoring system do not lend themselves well to this type of survey. The results are presented in Annex 11.

C. Gender Equality

Gender

The Alliance prepared a project-level Gender Mainstreaming Plan (GMP) with the Project Document, and all site engagements must prepare a site-level GMP. Blue Nature Alliance outlined three primary strategies for gender mainstreaming in the project:

1. Work with local partners that are deeply embedded in project sites and have close relationships with local stakeholders, and that are well-positioned to apply their in-depth knowledge of the specific geography to develop a quality Gender Action Plan and collect gender disaggregated data to monitor progress toward the gender goals.
2. Invest in capacity building for staff and implementing partners to raise awareness and understanding of gender and the importance of including women in marine resource management and conservation initiatives. Provide training to Alliance staff on how to complete gender assessments, as well as how to effectively support partners to develop and implement Gender Action Plans.
3. A Blue Nature Alliance Safeguards and Gender Manager will review and provide guidance on gender assessments and Gender Action Plans at multiple stages in the site development process.

The project level GMP and the reviewed site gender plans (as well as the annual workplans) indicate that gender considerations were taken into account in designing and implementing the project. All engagements are required to prepare a “right-sized” gender plan, i.e. the plan is more detailed if there are more risks and/or opportunities. Once site engagements are in implementation, partners report regularly on their progress through written reports or verbal reporting (verbal is new as of FY24) to the Safeguards Manager to provide an opportunity for project partners to ask questions, seek additional clarity, and discuss their project progress.

Alliance staff receive annual safeguards trainings that include gender. If GBV is indicated as a potential risk, Blue Nature Alliance will share and discuss CI's GBV response guidelines. Thus far, GBV risk has not been triggered. The Project M&E tracks gender indicators, and grant progress reports required gender disaggregated data. In addition to the minimum/standard indicators, projects were encouraged to provide additional gender indicators specific to their projects. Very few projects consistently monitored and reported these additional indicators, therefore, the current approach of Blue Nature Alliance is to focus on supporting projects to consistently report on the standard gender indicators. In FY24 the Alliance reviewed the gender mainstreaming plan and indicators to identify opportunities to ensure that Gender Mainstreaming Plans are a meaningful exercise for site engagement partners, and ensuring consistent reporting of gender indicators. This also included a commitment to switch from a binary man/woman sorting of beneficiaries, to be more inclusive of all genders.

The Blue Nature Alliance annual workplans contain 4 activities related to the GMP:

- Review and monitor portfolio of project sites in scoping and implementation phases to identify and plan for any high-risk situations such as social conflict or high rates of GBV. Keep record of all sites engaging with the Alliance to ensure each one has developed the required safeguard plans and implements

- Review Engagement Frameworks and Gender Mainstreaming Plans for each site to ensure that they include appropriate assessments/analyses and concrete actions and indicators that effectively minimize barriers and maximize opportunities for men and women to participate in and benefit from Blue Nature Alliance projects.
- Monitor compliance of grantees, including through semi-annual safeguard monitoring reports for each site and, when possible, site visits to high-risk grants.
- Monitor and report on CI-GEF minimum indicators.

The minimum indicators, targets, and current status for gender are as follows:

Indicator	Target	Current status
Number of men and women that received benefits (e.g. employment, income generating activities, training, access to natural resources, land tenure or resource rights, equipment, leadership roles) from the project	20,000 men and women receive benefits from the project, at least 50% of whom are women.	At the conclusion of FY24, a total of 12,717 people (35% women, 62% men, 2.5% unknown)
Number of strategies, plans (e.g. management plans and land use plans) and policies derived from the project that include gender considerations (this indicator applies to relevant projects)	All engagement frameworks and implementing partner workplans/strategies developed for the project include gender considerations.	At the conclusion of FY24, 42 engagement frameworks and 39 site engagement workplans/strategies include gender considerations

The percentage of female beneficiaries is currently below the 50% target. The Alliance attributes this in part to the fact that targets were set before the specific engagements had been determined. The targets assumed more community-based projects (those with more ability to proactively and meaningfully engage women) than are actually in the portfolio. The Blue Nature Alliance suggests that most of the Alliance projects engage with government or fishing industry officials, academics, other policy makers, etc. who are already in place and thus does not allow for significant influence over specifically who participates (and does not want to require projects to involve more women just to reach a certain target). The Alliance does not plan to alter its gender strategies and will continue to support projects to design fit-for-purpose gender approaches. Given that the Alliance definition of beneficiaries recently changed, it may be prudent to reassess the corresponding gender targets. It is noteworthy that the stakeholder engagement target of at least 33% of persons involved in the project implementation phase are women is currently exceeded (39% women).

As mentioned in the prior section on Knowledge Management, the project could have been more ambitious in incorporating gender-responsive measures into the design of Component 4. For example, the project might have advanced strategies and targets for women's participation and leadership in research (Output 4.1.1), or targeted professional development opportunities for women (Output 4.2.1). It is not clear to what extent the project has enhanced women's leadership and meaningful participation in decision-making spaces and processes. If there are good examples or data on this, it would be worthwhile for Blue Nature Alliance to report them. There was no mention of gender or women in the Technical Reports, Impact Reports, Experience Notes, Results Notes, or Communications Plans. This suggests additional opportunity for gender mainstreaming across the Alliance. As stated earlier, the Alliance reports that it is continuing to improve gender mainstreaming in the project, and has integrated gender into

the knowledge management plan as follows: 1) tracking participation of men and women in learning initiatives, workshops, etc., and tracking the utilization of tools by men and women (where possible); 2) a gender component in the social equity and human dimensions research; 3) plans to capture gender lessons learned in IW results/experience notes.

D. Knowledge Management

The Project Document provides a thorough presentation of provisions relating to knowledge management for the project, including the project description of Component 4 (Global Enabling Conditions to Scale Up Ocean Conservation), a dedicated section describing the knowledge management purpose and approach, and further elaboration in Appendix XI: Learning, Capacity Building, Knowledge Management and Collaboration framework. Knowledge management also is addressed through presentation of the project's provisions for communications. Overarchingly, the Alliance holds knowledge management, communications (including Knowledge Sharing (KS) and Monitoring and Evaluation (M&E)) as essential project elements to facilitate learning, strengthen management effectiveness, and accelerate the application and adoption of ocean conservation at scale. This includes activities to provide information on relevant tools and approaches and practitioners, support exchange of knowledge, and capture and communicate important results, successes and lessons for ocean conservation at scale, as well as support for scientific research that contributes to the field of ocean conservation (funded through co-financing).

The project design considers each of the Alliance's stakeholder groups as distinct audiences relevant to knowledge management activities: MPA managers, policy makers, NGOs, rightsholders and communities of place and practice, the private sector, the general public, and other practitioners. To support the generation and dissemination of knowledge products relevant to each of these audiences, the Alliance has established a knowledge management system to manage information on key topics including:

- What the Alliance needs to understand related to the sites it supports, including the key characteristics of the sites, the main objectives of our engagement and progress as measured against key metrics of success during implementation.
- Capacity and learning needs of Blue Nature Alliance and other large-scale sites and tools, approaches and practitioners that can assist sites to build needed capacity to achieve their objectives.
- Results from research undertaken to support the Alliance sites and other efforts to expand ocean conservation at scale
- Progress and lessons learned from site implementation that may benefit other sites and the wider field of ocean conservation at scale.

In addition to collation of information on these topics (and lessons captured through the Alliance M&E system), the Blue Nature Alliance has generated in-depth Lessons Learned and Case Study summaries that explore specific successes, challenges and other site learning. The Alliance also has engaged with the IW:Learn platform as a venue for disseminating knowledge (recognizing that IW:Learn itself was paused for a time, such that intended contributions of Experience Notes and Results Notes to the platform will happen later in the project implementation period). Finally, site implementers and other partners made particular mention of the value of learning initiatives arranged by the Alliance. These have included learning exchanges on key topics, providing direct technical assistance on specific needs, and convening side events at conferences such as the CBD COP.

The design of Knowledge Management strategies, as described in the Project Document, left room for greater attention to gender dimensions. The Gender Mainstreaming Plan included two gender-related activities in Component 4 (increase women's participation in learning initiatives; new tools will include gender-sensitive approaches and perspectives and aim to increase women's participation); including these and other strategies in the Knowledge Management Plan itself could better ensure that women contribute to and benefit from knowledge processes and products and further advance gender mainstreaming in the project. The Alliance reports that it is continuing to improve gender mainstreaming in the project, and has integrated gender into the knowledge management plan as follows: 1) tracking participation of men and women in learning initiatives, workshops, etc., and tracking the utilization of tools by men and women (where possible); 2) a gender component in the social equity and human dimensions research; 3. plans to capture gender lessons learned in IW results/experience notes.

Thus, the Knowledge Management Plan as presented in the Project Document thoroughly has been executed. A partial listing of products produced with Blue Nature Alliance support is as follows:

- [Kennedy & Rotjan 2022, The Impact of Geological Feature Shape on the Abundance and Diversity of Deep Sea Corals](#)
- [Bennett et al., 2021 Advancing Social Equity in and Through Marine Conservation](#)
- [Kennedy et al., 2023 Mind the gap: comparing exploration effort with global biodiversity patterns and climate projections to determine ocean areas with greatest exploration needs](#)
- [Baker et al., 2023 Improving human well-being outcomes in marine protected areas through futures thinking](#)
- [Sullivan-Wiley et al., 2023 Addressing human behavior in conservation design: Learning from program applications](#)
- [Claassens et al., 2023 First records of the Pacific sleeper shark *Somniosus cf. pacificus* in the western tropical Pacific](#)
- [Willis et al., 2023 The human cost of global fishing](#)
- [Kittinger et al., 2023 Balancing Protection and Production in Ocean Conservation](#)

III. Core Indicators

Indicator 2 Marine protected areas created or under improved management

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)
1250000000	1250000000	204252148	

Indicator 2.1 Marine Protected Areas Newly created

Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
750000000	750000000	116969918	

Name of the Protected Area	WDPA ID	IUCN Category	Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
			750,000,000.00	750,000,000.00	116,969,918.00	

Indicator 2.2 Marine Protected Areas Under improved management effectiveness

Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)
500000000	500000000	87282230	

Name of the Protected Area	WDP A ID	IUCN Category	Total Ha (Expected at PIF)	Total Ha (Expected at CEO Endorsement)	Total Ha (Achieved at MTR)	Total Ha (Achieved at TE)	METT score (Baseline at CEO Endorsement)	METT score (Achieved at MTR)	METT score (Achieved at TE)
			500,000,000.00	500,000,000.00	87,282,230.00				

Indicator 7 Shared water ecosystems under new or improved cooperative management

	Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)
Shared water Ecosystem Count	1	1	1	0

Indicator 7.1 Level of Transboundary Diagnostic Analysis and Strategic Action Program (TDA/SAP) formulation and implementation (scale of 1 to 4; see Guidance)

Shared Water Ecosystem	Rating (Expected at PIF)	Rating (Expected at CEO Endorsement)	Rating (Achieved at MTR)	Rating (Achieved at TE)
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Indicator 7.2 Level of Regional Legal Agreements and Regional management institution(s) (RMI) to support its implementation (scale of 1 to 4; see Guidance)

Shared Water Ecosystem	Rating (Expected at PIF)	Rating (Expected at CEO Endorsement)	Rating (Achieved at MTR)	Rating (Achieved at TE)
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Indicator 7.3 Level of National/Local reforms and active participation of Inter-Ministerial Committees (IMC; scale 1 to 4; See Guidance)

Shared Water Ecosystem	Rating (Expected at PIF)	Rating (Expected at CEO Endorsement)	Rating (Achieved at MTR)	Rating (Achieved at TE)
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Indicator 7.4 Level of engagement in IWLEARN through participation and delivery of key products(scale 1 to 4; see Guidance)

Shared Water Ecosystem	Rating (Expected at PIF)	Rating (Expected at CEO Endorsement)	Rating (Achieved at MTR)	Rating (Achieved at TE)
	1	4	4	

Indicator 11 People benefiting from GEF-financed investments

	Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)
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Female	1,128,000	1,233,500	4,464	
Male	1,272,000	1,233,500	7,935	
Total	2,400,000	2,467,000	12,399	0

IV: Co Financing

Sources of Co-financing	Name of Co-financier	Type of Co-financing	Investment Mobilized	Anticipated at CEO(\$)	Materialized at MTR(\$)
GEF Agency	Conservation International Foundation	Grant	Investment mobilized	23,028,913.00	2,952,887.00
Civil Society Organization	Pew Charitable Trust	Grant	Investment mobilized	20,965,859.00	5,115,668.00
Other	Rob and Melani Walton Foundation	Grant	Investment mobilized	20,032,065.00	13,565,705.00
Other	Minderoo Foundation	Grant	Investment mobilized	22,139,842.00	5,115,668.00
Private Sector	Vulcan, Skylight	In-kind	Recurrent expenditures	25,000,000.00	9,960,429.00
Civil Society Organization	Antarctic and Southern Ocean Coalition	Grant	Investment mobilized	482,539.00	1,600,000.00
Civil Society Organization	International Eco-Fund	Grant	Investment mobilized	3,816,400.00	5,085,823.00
Total Co-financing				115,465,618.00	43,396,180.00

Comments

The cofinance amounts that have materialized appear low in the financial reports because 1) cofinancing comes in after the reporting period; and 2) project spending has been slower than planned. It should be noted that in addition to the cofinancing from the 7 donors, the project leveraged more than \$400 million from their site-based and non-site-based engagements. These amounts are akin to cofinance but are not included in GEF cofinance totals.

V: ENVIRONMENTAL AND SOCIAL SAFEGUARDS

Overall Project/Program Risk Classification

PIF	CEO Endorsement/Approval	MTR	TE
	Medium/Moderate	Medium/Moderate	

Measures to address identified risks and impacts

Overall Environmental and Social Safeguards rating: Satisfactory

Overall, the project has successfully designed and executed environmental and social safeguard plans. Limited Environmental and Social Impact Assessments (ESIAs), safeguard screenings, stakeholder engagement plans, gender mainstreaming plans, and grievance redress mechanisms have been completed for all engagements in implementation. The project provides templates and manuals to project sites, accompanied by direct support and guidance to ensure effective implementation. While there were some challenges initially with a rigid one-size-fits-all approach to developing plans for the engagements, the Blue Nature Alliance has made a number of improvements to processes. Updates to safeguard processes in early 2024 are poised to improve efficiency and reduce the administrative burden on sub-grantees, streamlining compliance while maintaining high standards of environmental and social accountability. Recommendations for further improvement during implementation include 1) continuing efforts to ensure the AGMs are socialized; 2) reassessing what additional actions might be required to achieve the beneficiary gender target; 3) incorporate additional gender mainstreaming into the project such as updating communications and knowledge management strategies with an eye to gender considerations; 4) documenting examples of best-practices and lessons learned related to gender; and 5) assessing performance of and satisfaction with revised safeguard processes.

The project was rated in the Project Document as Category B (The proposed project has the potential to cause adverse environmental and social impacts on human populations or environmentally or socially important areas. However, these impacts are site-specific; few if any of them are irreversible; and in most cases mitigation measures can be designed more readily than for Category A projects.). As the project involves protected area creation, expansion or management improvement, the project is required to complete a Limited ESIA for each project geography (i.e., site engagement) prior to the start of any project activities within the selected geography. The project adopted and put in place the CI-GEF ESMF to ensure that all grantees comply with the CI-GEF Environmental and Social Safeguard requirements. In addition, Blue Nature Alliance developed a Code of Conduct to help the Alliance and its partners to more fully understand and integrate human dimensions in the project.

The Blue Nature Alliance reviews all Engagement Framework documents to ensure that a Limited ESIA has been completed for each selected geography prior to the start of any project activities (including those supported by GEF funding as well as sites supported from other sources). All sites are required to complete the safeguard packet prior to the first disbursement of grant funding. To date, 39 safeguards packets have been completed or are in advanced stages of development (one for each engagement in implementation) and an additional 20+ safeguards screening forms have been completed by non-site-based partners under 'Global Enabling Conditions'. Any necessary mitigation measures are identified during the safeguard screening, and have been incorporated into the SEP, GMP, and AGM plans. No other safeguards plans have been triggered by the project.

A series of updates to the Alliance's safeguards process were proposed to and approved by the CI-GEF Project Agency in FY24. The most significant shift in process was to conduct the safeguard screening earlier in the project design process and assign a risk rating to each engagement (low, medium, high), based on the context of the individual site as well as planned project activities. Based on this rating, each project is provided with appropriate templates for stakeholder engagement and gender mainstreaming plans, allowing projects to complete a safeguards process that is fit-for-purpose for its specific context (ex. an offshore MPA which has limited stakeholder and gender considerations due to its remote nature receives a more streamlined packet while an coastal MPA operating in a coastal area with significant reliance on subsistence fishing receives the full templates and is flagged for more frequent follow-up by the Safeguards Manager). The safeguards screening form is now available for partners to complete online.

Grievance Mechanism

The Alliance requires all sites to develop a fit-for-purpose Accountability and Grievance Mechanism that establishes site-level mechanisms accessible to stakeholders on the ground in each site, and maintains a global-level mechanism. The global-level Blue Nature Alliance Accountability and Grievance Mechanism is coordinated by the Blue Nature Alliance Safeguards Manager who escalates grievances, as needed, to CI's Global Grievance Committee on which CI's Director of Risk Management sits. The site leads and Safeguards Manager works with the implementing partners to establish site-level mechanisms. Detailed guidance for the establishment and operation of the site-level and global-level mechanisms is included in the Blue Nature Alliance Accountability and Grievance Mechanism Manual. The manual contains templates for site-Level AGM manuals, grievance forms and communications products. The project's AGM is available on the project website - <https://www.bluenaturealliance.org/grievance-mechanism>, which also includes additional resources such as the Blue Nature Alliance Code of Conduct, CI-GEF Agency Environment and Social Management Framework, and, when the risk of gender-based violence is identified during screening, CI Guidelines for Recognizing & Responding to Gender-Based Violence. These materials are shared with all project partners through a kick-off meeting which includes the Safeguards Manager prior to the issuing of any subgrants.

The implementing partners are responsible for disclosing the AGM to key stakeholders, as detailed in the site-level AGMs. Compliance by sub-grantees to establish an AGM and disclose grievances received is monitored through regular reporting with the Safeguards Manager. This requires confirmation and review of the established AGM at the start of the sub-grantee project and periodic checks on whether any grievances have been shared during the project's implementation.

The Blue Nature Alliance annual workplans contain 4 activities related to the AGM:

- Ensure that all grants establish and disclose a grievance redress mechanism with appropriate local contact channels and transparent procedures for responding and addressing grievances.
- Monitor the grievance mechanisms of individual grants and the grievance email account.
- Communicate any grievances raised by affected communities or other interested stakeholders to the CI-GEF Project Agency within 15 days of receipt.
- Monitor and report on CI-GEF minimum indicators.

To date, the project has received one grievance through its AGM which was deemed to not necessitate redress as it pertained to the business practices of a donor to the Alliance which falls outside of the purview of the project. No grievances have been reported by subgrantees. The Alliance notes that the lack of grievances is not confirmation of good practices, as it is also possible that the lack of grievances is a result of ineffective AGMs. Although it was not possible to conduct a full review of all site AGMs and assess whether project stakeholders were aware of the grievance mechanism, given the scale and scope of the project, the reviewed AGMs suggested that reasonable and accessible channels and procedures have been established. Additionally, Blue Nature Alliance safeguards leads have undertaken a review of all sites to verify compliance, and in an effort to improve the implementation of AGMs, the Alliance has adopted the following measures:

1. Updating the bi-annual reporting template to specifically ask about disclosure and stakeholder knowledge of the AGM
2. Capacity building and education on the importance of AGMs with site/regional leads, and ensuring that site leads verify AGMs during site visits
3. Bi-annual meetings with site/regional leads to review their portfolio, including status of AGMs
4. Joining bi-annual meeting with Project Implementers (for medium/high risk projects only) to review safeguard status
5. Changing the language from 'Accountability & Grievance Mechanism' to other terminology including 'Project Feedback & Grievance Mechanism' has helped to improve perceptions of the AGM.
6. To help ensure that the AGM is accessible to all stakeholders, updates are being made to the Alliance's main AGM, including adding an intake questionnaire (instead of just an email) and better disclosure of the procedures for processing grievances.

VI. ANNEX

Uploaded Document

Document Category M and E Document	Title 20241204_Management response to the MTR Report_GEF ID 10375 BNA
Document Category M and E Document	Title EcoAdvisors MTE BNA Report 20241220