

Niue Infrastructure, Ecosystems and Communities Integrated Project (Niue IECI)

Review PIF and Make a recommendation

Basic project information

GEF ID	12283
Countries	Niue
Project Name	Niue Infrastructure, Ecosystems and Communities Integrated Project (Niue IECI)
Agencies	UNDP, CI
Date received by PM	2/19/2026
Review completed by PM	
Program Manager	Juan Hoffmaister
Focal Area	Multi Focal Area
Project Type	FSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

April 2026: Kindly revise the name of the project to "Niue Infrastructure, Ecosystems and Communities Integrated Project" . You may send a note to OFPs informing them of the change and seeking agreement by email - i.e., a new LOE is not necessary.

The project is eligible for GEF funding. It addresses climate change adaptation (SCCF-A) and mitigation (GET/CCM) objectives in Niue, a GEF-eligible SIDS country.

OFP letter explicitly endorses the full GEF financing amount (USD 5,329,457) inclusive of both GET and SCCF-A components, but lacks some information

Agency's Comments

2nd Comment

N/A. PIF 9 million is submitted instead.

2. Project Summary

Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected results?

Secretariat's CommentsThe project summary is concise and outcome-oriented. It correctly identifies Niue's systemic climate vulnerabilities. The summary identifies the dual trust fund structure (GET and SCCF-A) and clearly states the expected global environmental and adaptation benefits

Agency's Comments

3 Indicative Project Overview

3.1 a) Is the project objective presented as a concise statement and clear?

b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

Secretariat's CommentsThe project objective is clearly presented: to strengthen Niue's integrated climate resilience and low-emission development and the four-component architecture is logical and internally coherent. The outputs under each component are sufficiently defined at PIF stage, with clear activity-level elaboration supporting the output logic.

Agency's Comments

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

Secretariat's Comments

April 2026: **Gender Integration:** Substantially addressed. Sex-disaggregated targets included.

Gender is substantively integrated throughout the project design rather than treated as a standalone compliance element. Please include in Section 9.2 of the Review Sheet: In the development of the Gender Action Plan, please ensure that the GAP aligns with the project

components. Please ensure that in the development of the results framework, gender-specific indicators are included to facilitate monitoring and reporting. Please indicate measures to facilitate and support the implementation of the GAP (e.g., budgets, regular monitoring, adaptive management, etc.). Please make a reference to include in PIRs, MTRs and TE, reports on gender-specific results, including the implementation of the Gender Action Plan.

Component 4 includes a structured local knowledge hub is well-conceived and appropriately funded. The M&E budget of USD 159,882 (approximately 3% of GEF financing). Please ensure that M&E activities are robust enough to effectively monitor and evaluate project implementation and results.

Agency's Comments

1st Comment

1. Comment in Section 9.2 of the Review sheet: The following comment has been included in section 9.2 of the review sheet: At the time of CEO Endorsement/ Approval, it will be ensured that the GAP aligns with the project components. Further, gender-specific indicators are included in the results framework to facilitate monitoring and reporting. Measures to facilitate and support the implementation of the GAP (e.g., budgets, regular monitoring, adaptive management, etc.) will be clearly presented and the final proposal will reference that PIRs, MTRs and TE will include reports on gender-specific results, including the implementation of the GAP and an explanation of monitoring arrangements, including means of verification and deliverables.

2. Comment on M&E Budget: AT PIF stage, and in line with GEF's Guidelines on the Project and Program Cycle Policy (2025 update), the M&E budget is comprised as follows;

M&E Activity	Budget
Inception workshop (M&E part)	\$ 21,882.00
Inception Report (M&E part)	\$ 10,000.00
M&E of Core Indicators and project results framework	\$10,000.00
Project Implementation Report (PIR)	\$ 5,000.00
Supervision missions	\$ 28,000.00
Monitoring of ESS, and management plans	\$ 5,000.00
GEF Tracking Tool to be updated at MTR and TE	\$ 10,000.00
Mid-term Review (MTR)	\$ 20,000.00
Independent Terminal Evaluation (TE)	\$ 50,000.00
Total	\$ 159,882.00

The final proposal will include a M&E budget, along with an explanation of monitoring arrangements and deliverables.

3.3 a) Are the components adequately funded?

b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?

c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

Component funding allocation is broadly proportionate to scope and implementation complexity. GEF PMC is within the 5%

The requested PPG of USD 150,000 is within the allowable cap for FSPs and is appropriate given the engineering design work required for shelter and water system specifications

Agency's Comments

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's Comments

April 2026: Climate Projections: Resolved. Table 1 now provides RCP 2.6/8.5 projections for the 25-year design horizon. **Barrier Analysis:** Resolved. Consolidated from 10 to 6 well-defined barriers with root causes.

March 2026: The situation analysis is sufficient. The project describes Niue's climate vulnerability from a genuine systems perspective, identifying the critical interdependency between energy, water, and ecosystem systems. Climate data and structural barrier are identified and quantified when possible.

While climate hazard trends are well-documented, the PIF does not provide explicit quantitative scenario projections under RCP 4.5 and RCP 8.5 for the specific design lifetime of the infrastructure (2026?2051 for 25-year solar assets). Please provide scenario-based climate projections for precipitation, cyclone intensity, and sea-level rise for the relevant planning horizon as required by SCCF adaptation guidance utilizing available data.

As for barriers, the project identifies a total of 10, which seems quite a lot, and some appear to overlap. Please check if some barriers can be merged and streamlined. This would also help simplify the Theory of Change, which currently feels a bit complex.

Agency's Comments

- 1st Comment**
1. Scenario-based climate projections: A table (1) has been added (Section A. I, page 13) showing the scenario-based climate projections for temperature, precipitation, cyclone intensity, and sea-level rise for the lifetime of the infrastructure.
 2. Barriers have been reduced to a total of 6: former 1 and 2 were merged, former 3,4 and 5 were merged, and former 9 and 10 were merged. The ToC (Figure 1, p. 22) has been updated.

4.2 JUSTIFICATION FOR PROJECT

- a) Is there an indication of why the project approach has been selected over other potential options?
- b) Does it ensure resilience to future changes in the drivers?
- c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?
- d) are the relevant stakeholders and their roles adequately described?

Secretariat's Comments

April 2026: Pilot/Village Scope: Resolved. Five shelters across eight villages now consistently described throughout. Private Sector Engagement: Substantially addressed. Chamber of Commerce and tourism operators named with concrete roles. Grid Connectivity: Addressed. Shelter systems confirmed as autonomous off-grid installations.

The integrated four-component approach is well-justified. The PIF demonstrates that isolated sectoral interventions have historically failed in small island contexts with high system interdependency. However, additional justification is required elaborating on possible involvement of private sector actors to maximize the use of these shelters year around and ensure financial sustainability, including their contribution to the project.

For the pilots, please clarify how many shelters will be built and how many villages will be targeted. The map suggests eight villages but component 2

refers to 5 pilot shelters. Additionally, we noted that these solar panels and energy storage systems will also be used by the villages during no-emergency times. Will these solar panels and storage systems be connected to the grid/minigrd? As per the PIF, it seems communities will own, operate and maintain the panels and the energy systems. If this is the case, please ensure that local communities are properly trained in the operation and maintenance of these systems. Please ensure that all solar panels, batteries, and related components are procured exclusively from supply chains that are fully transparent and demonstrably free from child labour or any form of forced or exploitative work. In addition, confirm that a comprehensive end-of-life management plan is in place for all equipment. This plan should guarantee that decommissioned panels and batteries are collected, transported, recycled, or disposed of safely in accordance with applicable environmental regulations and recognized international environmental and social standards. Particular care should be taken to ensure the responsible handling of hazardous materials and prevention of soil and water contamination. Finally, the PIF mentioned potential opportunities for replicability within the country as a result of these pilots. If yes, the agency may want to estimate and consider the additional indirect emission reductions from replication.

Regarding private sector engagement, the approach is not clear. It would be helpful to clarify how the project plans to involve the private sector throughout design and implementation.

Agency's Comments **1st Comment**

1. Clarification of shelters and villages targeted: The specific locations of the shelters will depend on cabinet and will be decided during project formulation stage following a detailed assessment and a clearly outlined selection process and relevant selection criteria. Shelters will most likely will be located on Crown land due to land tenure issues in Niue and to ensure public access, simplify permitting, and facilitate long-term operations and maintenance. The PIF has been updated with this information

2. Solar panels and storage systems be connected to the grid/minigrid: The solar PV systems in the shelters will be designed to operate as stand-alone (off-grid) systems supplying designated loads within each facility, which remains connected to national grid. However, at this stage, the solar PV systems themselves will not be connected to the national grid networks due to persisting grid stability constraints arising from the number of small distributed systems already connected in Niue. Keeping the shelters independent avoids back-feed and voltage/frequency issues and ensures reliable service for critical community uses during outages. Each shelter will also include a self-sufficient, solar-powered basic water supply (e.g., pumping and storage) to provide continuity during emergencies. Under normal conditions, these facilities will remain connected to the main village water reticulation, with the stand-alone power serving as a resilience back-up. Recent operations at the Tuapa community centre have demonstrated the practical benefits of this stand-alone configuration during power interruptions.

3. Please ensure that local communities are properly trained in the operation and maintenance of these systems: Output 2.2 and corresponding activities focus on strengthening local operation, maintenance and governance capacity of solar systems including developing operational guidelines, manuals, and standard procedures, hands-on trainings, and support in establishing local governance structures to build the capacity of communities and institutions to operate, maintain, and sustainably manage climate-resilient energy, water, and shelter infrastructure.

4. Supply chains that are fully transparent and demonstrably free from child labour: The following sentence has been added to the mitigation measures of the risk table in Section B, p.44: "Procurement of solar panels, batteries and related components will follow UNDP procurement policies and supplier due-diligence requirements to ensure supply chains are transparent and compliant with international labour standards, including explicit prohibitions on child labour, forced labour and other exploitative practices."

5. Comprehensive end-of-life management plan is in place for all equipment: Niue is finalizing a national Waste Management Strategy, which is scheduled for submission to Cabinet in early April 2026 and will provide the near-term policy basis for managing end-of-life solar panels and batteries. In the interim, regulations can be issued under the existing environmental legislation, while the Government's stated preference is to adopt a standalone Waste Bill to establish a comprehensive, fit-for-purpose framework; to operationalize regulations, a legislative drafter will need to be recruited. Until the new Bill is enacted, the Project will reference and align with the Strategy and any regulations promulgated under the current Act, and will update its EoL plan once the standalone waste legislation is approved.

6. Opportunities for replicability within the country as a result of the pilots: Based on the initial discussion during the PIF development, a potential replication of 15 more shelters can be assumed. Thus, an additional 4,824 metric tons of CO₂e have been included as indirect (consequential) emission reductions from replication. The PIF and the core indicator sheet has been updated. The underlying calculations and assumptions for emission reductions outside AFOLU are provided in a separate excel file.

7. Private sector engagement: The PIF has been revised to clarify private sector engagement across design and implementation phases. Specific roles of the Niue Chamber of Commerce, service providers (including solar PV and infrastructure contractors), and tourism operators have been integrated across Components 1-4. Relevant cost-sharing and private sector involvement in infrastructure will be further explored during the PPG phase.

5 B. Project Description

5.1 THEORY OF CHANGE

a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?

b) Are the key outputs of each component defined (where possible)?

Secretariat's Comments

April 25:

- CCA: Please confirm the figure on p.45 ("1,344,514,000 hectares", should it be 44,514,000?_ Also, if we understand correctly Moana Mahu (12.7M ha) is a no-take subset of the Nukutuluea Multiple-Use MPA (31.8M ha) and should not be summed under Indicator 2.2. Please report Nukutuluea as the total area as there appears to be an overlap or double-counting.
- The revised PIF substantially strengthens the capacity-building and multi-purpose framing of the climate-resilient shelters. However, the financial sustainability of shelter beyond project closure and any possible revenue for use when not used as shelter remains a material gap. Please note in the revised PIF that the following will be addressed during PPG and elaborated during CEO Endorsement: annual O&M cost estimates per shelter; asset ownership and revenue-collection authority for non-emergency multi-purpose use and plans to pursuing such revenue; cost-recovery instrument; and major repair/replacement reserve arrangements between Village Councils, stakeholders, and central government.
- Adaptation M&E indicators in Component 5 are largely process-based; consider adding outcome-level adaptation metrics (e.g., reduction in service disruption days, reduction in damage costs from extreme events)
- Please strengthen at CEO Endorsement the attribution logic linking SCCF-A-financed activities (climate risk governance, coastal EbA, ecological monitoring) to adaptation outcomes within the NOW Trust-supported MPA estate, including how SCCF-A investments reinforce climate-resilient MPA management and how adaptation co-benefits are captured alongside the GET-funded capitalisation. Please note of the revised PIF.
- CCM: The PIF does a good job of explaining the generation of both direct and indirect mitigation CO2 outcomes. It's important to note that the GEF typically reports on both types of CO2 reductions. With that in mind, I recommend that throughout the proposal, including the project summary and the environmental benefits section, the agency reference both indirect and direct reductions (i.e., 11,188 tCO2e), rather than only the direct reductions figure (i.e., 6,364 tCO2e).
- Biodiversity*: The project has been improved with a better whole country approach, including protection of BD and natural ecosystems and mitigation and adaptation to climate change in the same project. Nevertheless, the ToC should better reflect impacts of the project on BD conservation. Currently it is still focused on climate adaptation and mitigation.
- The landscape and seascape approach (components 1, 2, 3) make it aligned to restoration activities in areas of global significance through conditions of justifying this Global significance of the BD (Objective 1 of the BD FA, ***To improve conservation, sustainable use, and restoration of natural ecosystems***). Restoration for benefits to BD and climate mitigation is well aligned at conditions also to monitor the benefits produced to improve the status of the BD.
- Management and control of IAS, included in restoration activities are also aligned if management strategy is planned and included for example in the component 1 (output 1.1.2, 1.2.2).
- Component 4 is aligned with Objective 3 of the programming directions (To ***increase mobilization of domestic resources for biodiversity***), *by establishing a long-term and sustainable financing for conservation of natural areas and ecosystems in Niue*

? Summary:

? There is no description of the globally significance of the biodiversity targeted by the project to justify BD programming. The agency needs also to provide any context of the BD dynamics and drivers of BD loss to explain how, by the components, they will address them

and preserve this globally significant BD . (This appears in the rationale but needs to be reintroduced in the summary to better explain the approach).

? Indicative Project overview:

- Formatting issue
- Replication of each component
- Output 3.2 is missing

? Project description

- Component 1: Ask the agency to also introduce BD information in policies and governance mechanisms

o 1.2 Institutional systems, policies, and governance mechanisms strengthened to systematically apply climate-risk and BD information

? 1.1.2 Update or develop new policies, procedures, and guidelines to institutionalize the use of climate risk and BD data in planning and permitting

o P. 32 of the pdf : ?This component addresses these governance and planning barriers by establishing a robust, BD conservation, climate- and energy-risk?informed enabling environment that underpins all future infrastructure.?

o P. 32 : ?Complementing the technical BD protection and risk analysis, the component will strengthen institutional systems and governance mechanisms to ensure that BD and climate risk information is systematically applied in practice?.

Component 3:

- The title for outcome 3 should be reformulated to better express idea of improvement of the status of the globally significant biodiversity, not only being seen for mitigation.
- This component refers to IAS management plans, but this is not being planned in component 1 from what I have seen. It would be interesting to include strategy and management plans for IAS in component 1 (with other planning activities)
- 3.3.3 must also monitor status of the BD not only effectiveness of the terrace.

Component 4:

- The activities are planned to strengthen the funding mechanism of the trust fund. The capitalization funds from this project for the NOW Trust Fund will not be disbursed until there is a confirmed 1:1 match from a non-GEF source which is a good thing.
- The PPG phase should also explore opportunities for the project to develop more GEBs. Currently the project states that 44514000 HA of Marine protected areas under improved management effectiveness are targeted, but this should be developed in one output (explicit management strategies and improvement of practices?). It is not the case currently. To see if this is included in the component 4 or in another component ?
- On the ground activities developed through testing the implementation of the Now Trust Fund would be a gain for the project. This should be explored.

Component 5:

- Monitoring activities should include monitoring of the status of BD, not only data linked to climate. This could be precise with a list of species indicators to monitor (to be included in 5.1.4).

Core indicators:

- The CI 3 for restoration activities should be filled consistently with the project description.
- Contribution of the targets of the Kunming-Montreal Global Biodiversity Framework: Targets 1, 3 should also be included.

April: **EbA Causal Logic:** narrative strengthened; site-specific community/asset mapping deferred to PPG with clearer criteria and process

The theory correctly identifies that these conditions must be met simultaneously rather than sequentially: the four components are mutually reinforcing rather than independent workstreams. Key assumptions are explicitly stated, including continued stakeholder engagement, effective institutional uptake of risk information.

The EbA component (C3) theory of change requires an evidenced-based causal leap from restored coastal terrace area to measurable reduction in storm damage exposure for specific communities and infrastructure assets. Please provide, if possible, now or at CEO Endorsement, site-specific analysis demonstrating which communities and assets are protected by which terrace restoration sites, and an estimate of the reduction in flood/erosion risk achieved. Noting that restored terraces only remain effective if communities maintain them after project closure, please detail the specific legal or governance instruments to be put in place for the sustainability of this component.

GHG. Thank you for providing the Ex-ACT tool for the AFOLU calculations. Kindly provide an excel sheet also for the estimation of the non-AFOLU emission reductions, so the GEF team can track the calculations provided in writing under the "Core Indicators" section.

Agency's Comments

3rd Comment

A. The PIF has been updated to 31,814,000 ha (see (2) below). The PIF and corresponding indicator worksheet have been updated and now report only Nukutuluea as the total area (e.g. 31.8M ha)

B. The statement on conducting these assessments during PPG phase has been added under Outcome 2 (p. 33)

C. The suggested outcome-level adaptation metrics have been added to Outcome 5 (both in the narrative and under 5.1.3.)

D. The statement on strengthening this attribution logic has been reflected under Component 4 (p. 36).

E. This has been updated accordingly throughout the PIF.

F. The ToC has been updated to further clarify how the project will impact BD conservation.

G. Noted with thanks.

H. Outcome 1 (1.1.2 & 1.2.2.) have been amended to reflect the development of strategy and management plans for IAS to inform IAS management and control activities under component 3.

I. Noted with thanks.

J. The summary have been expanded by reintroducing aspects of the rationale justifying the BD programming.

K. Indicative project overview table has been reformatted. Components and missing output have been revised.

L. The PIF has been updated with the suggested input.

M. 1. Outcome 3 has been reformulated as follows to better reflect the contribution to globally significant BD: "Coastal terraces and ecosystems restored and sustainably managed to improve the status, integrity, and resilience of globally significant biodiversity, while delivering climate adaptation and mitigation benefits."

2. Development of IAS management plans have been included under component 1 (see comment above)

3. Output 3.3.3 has been amended to also monitor the status of biodiversity

N. 1. Noted with thanks.

2. An additional Output 4.6 has been added to component 4: "4.6 Management effectiveness of marine protected areas strengthened through explicit management strategies and improvement of practices"

3. A sentence has been added to component 4 (p. 38)

O. 1. Output 5.1.4 has been amended to reflect the monitoring of BD status and list of species indicators

P. 1. The PIF and indicator sheet have been corrected so that the 60 ha of coastal ecosystems that will be restored are now reported under CI 3.

2. Targets 1 & 3 have been added to section C.

1st Comment

1. Site-specific analysis: Site-specific analysis of coastal risks and protective functions of terraces has already been undertaken in existing design studies applying participatory, site-based assessment of cyclone exposure, coastal dynamics, and design strategies of natural barriers targeted across vulnerable coastal areas (e.g. Freddie (2018)). The project builds directly on these approaches and will apply them during implementation to guide site selection and design. A reference to this has been included to Component 3, p 31. in the PIF.

2. Legal or governance instruments: Sustainability will be ensured through the integration of terrace restoration responsibilities into existing village council structures, supported by community stewardship mechanisms, operational guidelines, and capacity-building. A reference to this has been included to Component 3, p 31. in the PIF.

3. Non-AFOLU GHG emissions: GHG emission calculations are made available in the sheet entitled "Emissions avoided outside AFOLU sector (direct and indirect)?"

5.2 INCREMENTAL/ADDITIONAL COST REASONING

Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?

Secretariat's Comments The incremental cost reasoning is adequately described for a PIF stage document.

Agency's Comments

5.3 IMPLEMENTATION FRAMEWORK

a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?

b) Comments to proposed agency execution support (if agency expects to request exception).

c) Is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area

d) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

Secretariat's Comments

• *April 25: Cooperation with ongoing initiatives:* There is no explanation to describe cooperation with ongoing initiatives. Instead, the Agency referred to implementation arrangements to be developed later. Please amend.

Coordination and Cooperation with Ongoing Initiatives and Project.

Does the GEF Agency expect to play an execution role on this project? No

If so, please describe that role here. Also, please add a short explanation to describe cooperation with ongoing initiatives and projects, including potential for co-location and/or sharing of expertise/staffing

Implementation arrangements will be further defined in the PPG phase.

Core Indicators

April 2026: Section 'Coordination and Cooperation with ongoing initiatives' is empty (green rectangle below) - please amend.

Also, UNDP suggested that they are planning to involve the Country Office support during implementation. At this early stage, it is too premature to decide whether the dual execution is appropriate. Once the Agency has sufficiently progressed in project preparation, and providing that the request is based on one of the 5 exceptions approved by Council in June 2025, the Agency must follow the procedure depicted in Annex 7 of the Guidelines 2025 to request the exception. In the meantime, remove any mention on them playing the dual implementation / execution role.

Coordination and Cooperation with Ongoing Initiatives and Project.

Does the GEF Agency expect to play an execution role on this project? No

If so, please describe that role here. Also, please add a short explanation to describe cooperation with ongoing initiatives and projects, including potential for co-location and/or sharing of expertise/staffing

The project is proposed to be implemented under National Implementation Modality (NIM), with direct Country Office (CO) support, subject to approval by the GEF.

Implementation arrangements will be further defined in the PPG phase.

Core Indicators

March: Regarding collaboration with ongoing activities and projects, please consider engaging with UNIDO and collaborating under the Global Program on Climate-Resilient Renewable Energy Systems ID12229 (project is still under review), which is also funded by the GEFTF and the SCCF. There are several areas of common interest, and a coordinated approach could enhance impact.

Thank you for including the collaboration with the Adaptation Fund. We encourage to continue to indicate synergies where possible in the document.

Agency's Comments

3rd Comment

1. The proposed approach how the project will collaborate and coordinate with other relevant ongoing initiatives has been added to the PIF (p. 40).

2nd Comment

N/A. PIF 9 million is submitted instead.

1st Comment

1. UNIDO Global Program on Climate-Resilient Renewable Energy Systems: The PIF has been updated (Section A 4 (p. 18) and Table 2 and Component 4 (p. 33)) to include the UNIDO-led Global Program on Climate-Resilient Renewable Energy Systems (G-RES) as a relevant ongoing initiative. The project will seek synergies through knowledge exchange, alignment of technical approaches, and private sector engagement. Initial engagement with UNIDO has already been initiated, and collaboration will be further developed during the design phase.

2. The project aims to target ecosystem resilience through invasive species control and habitat restoration, strengthening food security and livelihoods, and promoting regional cooperation for nature-based climate adaptation in small island communities. Complementarities with the project will be further defined during the PPG phase.

5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?

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

Secretariat's Comments Targets are reasonable and achievable at the scale of financing and national circumstances

Agency's Comments

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

Secretariat's Comments N/A

Agency's Comments

5.6 RISKS

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

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

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

Secretariat's Comments

ESS Risk Rating: Addressed.

Sustainability risk is not considered in the proposal: the absence of a revenue model or user-fee mechanism for the multi-purpose shelters during non-emergency use (eco-tourism and community functions, etc). Without cost-recovery, the O&M burden falls entirely on government budgets, both already constrained. Please add this risk and propose a specific mitigation mechanism (e.g., village-managed user fee arrangement for commercial or tourism use), including revisions to project elements as necessary

Additionally, rating under the Environmental and Social risk category (currently substantial) should be the same as the rating under the key risk table, Environmental and Social Safeguards (ESS) risk, as per the GEF risk appetite GEF/C.66/13.

Agency's Comments **1st Comment**

1. Sustainability risk: The PIF has been revised to include a sustainability risk related to the operation and maintenance of multi-purpose shelters (included under Financial and Business Model risk in the risk table). Mitigation measures have been introduced, including village-managed user-fee arrangements for commercial use, engagement of tourism operators, and access to complementary financing through mechanisms such as the Niue Ocean Wide (NOW) Trust Fund, supported by capacity-building and operational guidelines.
2. Risk rating: The ESS risk in the SESP has been corrected to 'substantial' to be in line with the Environmental and Social risk category in the PIF

5.7 Qualitative assessment

a) Does the project intend to be well integrated, durable, and transformative?

b) Is there potential for innovation and scaling-up?

c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's CommentsThe project is well-integrated across components, trust funds, and sectors. The project's transformation claim ? shifting from fragmented reactive responses to an integrated resilience model ? is strong. The project is tightly aligned with Niue's National Strategic Development Plan 2016?2026, NDC, Niue Energy Road Map (NERM) 80% renewable target, National Climate Change Policy, and NBSAP. No contradictory policies or subsidies are identified.

Agency's Comments

6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities

6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?

Secretariat's CommentsThe project is well-aligned with GEF-8 programming directions across both its financing sources

Agency's Comments

6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors)

Secretariat's Commentscountry alignment is strong and explicitly documented. Regional alignment is demonstrated through Component 4's South-South learning agenda targeting 14 Pacific SIDS partners and the planned SPREP Adaptation Fund complementarity.

Agency's Comments

6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat's Comments

April 2026: **KMGBF Alignment:** Resolved. Targets 2, 5?8, 9?13, and 18?23 now explicitly cited.

The PIF does not explicitly cite the KMGBF targets that the project contributes to. Please consider applying given the nature-based solutions applied

Agency's Comments**1st Comment**

1. KMGBF targets that the project will contribute to have been identified and included in section C, p. 49 of the PIF.

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

April 2026: Stakeholder Consultation: Named, dated table with 16 engagements across three mission periods. Please incorporate in the added information on stakeholder consultations directly in the PIF portal version.

Please clarify which Civil Society Organizations and local communities have been consulted during project design and provide a brief summary of the findings of consultations to date and how these informed project components.

Agency's Comments

3rd Comment

1. Section D in the PIF has been updated with additional information including which CSOs and local communities have been consulted during project design as well as summary of the findings of consultations and how they informed the project components.

2nd Comment

N/A. PIF 9 million is submitted instead.

1st Comment

1. In addition to government consultations recorded in the PIF, initial outreach to non-government stakeholders was undertaken, drawing on inputs from recent national climate policy processes (e.g. during NDC development) and targeted discussions held during project scoping. The following civil society organizations that were engaged at PIF stage included the Niue Chamber of Commerce and Niue Island United Non-Governmental Organizations (NIUANGO). Three village councils were also consulted during the PIF stage. At PIF stage, inputs from government, the private sector, and civil society/communities were gathered through broader national dialogues (e.g., NDC-related outreach) and preliminary discussions for the NBSAP review/update and subsequently translated into the project's component design. More detailed CSO/community consultations will be expanded and fully documented during the PPG phase

8 Annexes

Annex A: Financing Tables

8.1 Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):

STAR allocation?

Secretariat's Comments

Agency's Comments

Focal Area allocation?

Secretariat's Comments

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's Comments

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments Yes

Agency's Comments

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

Secretariat's Comments

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments

Agency's Comments

8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

Co-financing of USD 19,688,000 is documented from four sources, with co-financing ratio of 3.7:1 co-financing to GEF

Agency's Comments
Annex B: Endorsements

8.4 Has the project been endorsed by the country's(ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?

Secretariat's Comments Yes

Agency's Comments

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

Secretariat's Comments

•Letter of Endorsement misses the footnote that conditions the selection of the executing partner to the following: "Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate". Please get an email from the OFP accepting this footnote to be part of the LoE (this is an alternative to request a new LoE).

Agency's Comments **1st Comment**

1. The footnote has been agreed with OFP.

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

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

Agency's Comments

Annex C: Project Location

8.6 Is there preliminary georeferenced information and a map of the project's intended location?

Secretariat's Comments

Agency's Comments

Annex D: Safeguards Screen and Rating

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

Secretariat's Comments

April 2026: Addressed, Please incorporate in the added information directly in the PIF portal version.

March 2026

We note that UNDP attached Social and Environmental risk Screening checklist (SESP), and an overall ESS risk is classified as Moderate. In the context of Niue, Please seek strong engagement with Indigenous Peoples and local communities for the effective implementation of this project:

1. Please clarify whether the project consulted with Indigenous Peoples and local communities and vulnerable populations about the project concept (PIF) and how the results of consultations were integrated into project concept (PIF).
2. Please elaborate on the application of FPIC in the context of Niue and accordingly ensure obtaining Free, Prior, and Informed consent (FPIC) from Indigenous Peoples during PPG stage about project design and throughout project implementation as relevant to Niue.
3. Please ensure recognizing vulnerable communities and Indigenous Peoples and local communities not only as beneficiaries, but also as partners in the project governance including the project steering committee.
4. SESP said moderate risk. However, environmental and social risk in the key Risk table mentioned ?Substantial? risk (PIF, page 40). Please make these risks consistent.
5. Please consider integrating Indigenous Peoples governance and traditional and local knowledge as a part of project activities, particularly in Component 2 and 3.
6. Please also consider including integration of vulnerable communities and Indigenous Peoples governance, traditional and local knowledge, capacity building, and number of Indigenous Peoples beneficiaries as monitoring indicators where appropriate during PPG.

Agency's Comments

3rd Comment

1. SESP is uploaded in the GEF portal.

2nd Comment

N/A. PIF 9 million is submitted instead.

1st Comment

According to Niue's 2022 census, 68% of Niue's population is considered to be Niuean, 5% is considered to be part-Niuean, 19% are non-Niuean from other Pacific Island countries (Tonga, Fiji, Tuvalu and Samoa) and 8% are non-Niuean from outside the region. Correspondingly,

roughly 92% of Niuean's population can be considered indigenous and self-identify as Pacific Islanders/Indigenous Peoples. While UNDP's SES Standard 6 would typically require the development of an Indigenous People's Plan for, considering that 90% of Niuean's self-identify as Pacific Islanders/Indigenous peoples, the project will not develop an indigenous people plan (IPP), as it would need to cover most of the population. Instead, during project formulation, a comprehensive stakeholder engagement plan will be developed, with necessary IPP elements incorporated in the project's SES-related documentation

1. Yes, the stakeholders consulted for the PIF are Niuean's and self-identify as Pacific Islanders/Indigenous peoples.
2. During the PPG phase, detailed community consultations will take place to define and inform project activities in the target locations/communities. Definition of Free, Prior and Informed Consent (FPIC) procedures will be defined in the SES so that FPIC requirements can be adequately followed during the implementation stage of the project.
3. Project governance arrangements to be formulated during PPG phase will ensure that beneficiary representatives, including Indigenous Peoples and local communities, will be part of the project governance including the project steering committee.
4. This has been corrected and made consistent (see comment above)
5. Component 2 and 3 are designed to ensure that traditional and indigenous knowledge will be part of the project components. For example, activity 3.3.2 foresees to integrate traditional ecological knowledge into restoration planning and implementation while activity 2.2.9 will work with indigenous community committees to ensure monitoring, maintaining, and managing of climate-resilient infrastructure are informed by and embedded in existing traditional local governance mechanisms.
6. Since roughly 92% of Niuean's population self-identify as Pacific Islanders/Indigenous Peoples and since the project will target to benefit 68% of the total population, the majority of project beneficiaries are likely to be indigenous people. During the PPG phase and the formulation of the SES and accompanying project documentation, an assessment will be undertaken whether and where relevant Indigenous Peoples beneficiary indicators are appropriate and needed.

Annex E: Rio Markers

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

Secretariat's Comments

- Please considering tagging the project as LD1 as the project is also successfully contributing to the restoration of a total of 60 ha of terraces.

Agency's Comments

1. Rio Markers, Annex F and the SCCF Meta sheet in the PIF has been updated to tag the project against LD

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments

Agency's Comments

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments: Kindly address feedback before next submission.

Agency's Comments

1st Comment

1. The feedbacks have been addressed.

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

Secretariat's Comments

1. Please provide justification of the global significance of the biodiversity targeted by the project and its contribution to the persistence of biodiversity components - genes, species, or ecosystems - in relation to their worldwide extent or population size.

You are invited to use the Key Biodiversity Area (KBA) standard or other criteria commonly used to identify areas for biodiversity conservation, but other well justified criteria will be accepted with consideration for the specific project context and data availability

2. Gender Action Plan (GAP)

- Ensure the GAP aligns with project components
- Include gender-specific indicators in the results framework to facilitate monitoring and reporting
- Present measures to support GAP implementation: budgets, regular monitoring, adaptive management
- Reference that PIRs, MTRs, and TE will report on gender-specific results, including GAP implementation, monitoring arrangements, means of verification, and deliverables

3. Climate-Resilient Shelters ? Financial Sustainability

The PIF commits these to be elaborated at CEO Endorsement:

- Annual O&M cost estimates per shelter

- Asset ownership and revenue-collection authority for non-emergency multi-purpose use, including plans to pursue such revenue
- Cost-recovery instrument design
- Major repair/replacement reserve arrangements between Village Councils, stakeholders, and central government

4. SCCF-A Attribution Logic to NOW Trust MPA Adaptation Outcomes

- Strengthen the attribution logic linking SCCF-A-financed activities (climate risk governance, coastal EbA, ecological monitoring) to adaptation outcomes within the NOW Trust-supported MPA estate
- Articulate how SCCF-A investments reinforce climate-resilient MPA management
- Show how adaptation co-benefits are systematically captured alongside the GET-funded NOW Trust capitalization

5. NOW Trust Fund Capitalization Conditionality

- Clarify timing and conditionality of the 1:1 non-GEF match requirement (PIF states this will be elaborated at PPG/CEO Endorsement)
- Assess and account for blue carbon as a potential financing mechanism and demonstration of GEBs
- Define innovative approaches to align NOW Trust grantmaking with project activities to maximize on-the-ground synergies
- Explore on-the-ground pilot activities to test and operationalize the NOW Trust Fund

6. Stakeholder Consultations ? CSO and Community Engagement

- Expand and fully document detailed CSO and community consultations during PPG (committed at PIF stage)
- Define Free, Prior and Informed Consent (FPIC) procedures in the SES for the implementation stage
- Develop a comprehensive stakeholder engagement plan with necessary IPP elements incorporated in SES-related documentation (in lieu of a standalone IPP, given ~92% of population self-identifies as Pacific Islanders/Indigenous)
- Ensure beneficiary representatives (including Indigenous Peoples and local communities) are part of project governance, including the Project Steering Committee
- Assess whether Indigenous Peoples beneficiary indicators are appropriate during PPG/SES formulation

7. Site-Specific Design Work (PPG ? CEO Endorsement)

- Shelter site selection finalized through detailed assessment, clearly outlined selection process, and selection criteria (Cabinet decision)
- Engineering design specifications for shelter and water systems (justifying the USD 150,000 PPG)
- Procurement assessment to determine whether UNDP will conduct procurement directly or executing partner will, with appropriate supply chain due diligence requirements

8. End-of-Life Management for Solar/Battery Equipment

- Update the EoL plan once Niue's standalone Waste Bill is enacted (currently aligning with the National Waste Management Strategy submitted to Cabinet April 2026)
- Reference and align with regulations promulgated under the current Environmental Act in the interim

9. M&E Framework Robustness

- Ensure M&E activities within the USD 159,882 budget (~3% of GEF financing) are robust enough to effectively monitor project results
- Final proposal to include detailed M&E budget with explanation of monitoring arrangements and deliverables

10. Coordination with Ongoing Initiatives ? Operational Detail

- Further define modalities of cooperation with UNIDO/GEF G-RES Global Program during the design phase
- Define complementarities with the planned Adaptation Fund project on invasive species management for EbA during PPG
- Further define complementarities with UNEP-GCF CIS-PAC5 to ensure Niue-IECI builds on improved climate data without duplicating climate information generation
- Ensure no overlap or double-counting with GEF 12069 Unlocking Blue Pacific Prosperity (UBPP) Ocean Flagship project (also CI-implemented)

11. Private Sector Engagement ? Cost-Sharing Detail

- Further explore relevant cost-sharing and private sector involvement in infrastructure during PPG (Niue Chamber of Commerce, tourism operators, solar PV/infrastructure contractors)
- Operationalize the hybrid business and financing model (village-managed/private-sector user-fee mechanisms)

Agency's Comments

Review Dates

First Review

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)

PIF Review

3/11/2026

4/13/2026

4/25/2026

Agency Response