

Eighth Operational Phase of the GEF Small Grants Programme (Part 1)

Review PIF and Make a recommendation

Basic project information

GEF ID

11285

Countries

Global (Algeria, Antigua and Barbuda, Argentina, Armenia, Bahamas, Belize, Benin, Brazil, Burkina Faso, Burundi, Cabo Verde, Cambodia, Cameroon, Central African Republic, Colombia, Comoros, Congo, Congo DR, Costa Rica, Cote d'Ivoire, Cuba, Djibouti, Dominican Republic, Egypt, Eritrea, Ethiopia, Fiji, Gabon, Gambia, Georgia, Grenada, Guinea, Guinea-Bissau, Haiti, Honduras, Jordan, Kyrgyz Republic, Lao PDR, Lebanon, Liberia, Mali, Moldova, Mongolia, Morocco, Mozambique, Namibia, Nauru, Nepal, Niger, Nigeria, Palau, Panama, Philippines, Rwanda, Samoa, Senegal, Seychelles, Sierra Leone, Solomon Islands, South Africa, St. Lucia, Suriname, Tanzania, Timor Leste, Togo, Tonga, Tunisia, T?rkiye, Ukraine, Uruguay, Vanuatu, Venezuela, Zambia, Zimbabwe, Bangladesh, Albania, Barbados, Bhutan, Botswana, Ecuador, El Salvador, Ghana, Guatemala, Kiribati, Lesotho, Madagascar, Maldives, Mauritania, Mauritius, Micronesia, North Macedonia, Palestinian Authority, Paraguay, Thailand, Trinidad and Tobago, Uganda, India, Jamaica)

Project Name

Eighth Operational Phase of the GEF Small Grants Programme (Part 1) **Agencies**

UNDP
Date received by PM

4/13/2023
Review completed by PM

4/24/2023
Program Manager

Elsa Temm
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

5/19/2023

Cleared

5/18/2023

We appreciate UNDP's careful consideration of the number of countries and find that comments have been addressed with regard to reducing the number of countries. This appreciated these adjustments and the efforts made to undertake them

Sierra Leone has however oversubscribed the 10% rule with \$469. Please revise.

5/15/2023: GRT Not fully

As expressed previously, the Secretariat strongly affirms the need to reduce the number of countries included in the PIF to under 100 countries. This is to reflect the GEF secretariat?s interest to:

- 1. Deliver on the ambition and intention of the SGP 2.0 as set forth in the SGP 2.0 implementation arrangements, approved by the GEF Council in December 2022.
- 2. Secure a sufficient pool of countries available for Tranche 2 to provide countries the choice of additional SGP Implementing agencies (opening up opportunities for greater country ownership and choice)
- 3. Weigh the overall June Council Work Program with regards to GEF Agency concentration, and the overall STAR allocation requests (considering the limited available funding for this June work program).
- 4. Safeguard continuance of current SGP Country Programs and operations.

Important to note that in line with the SGP 2.0 Implementation Arrangements, universal access and opportunity for all countries to access SGP core financing is of utmost importance to the GEF Secretariat. The notion of reducing the number of countries in this PIF does not mean that these countries will not access SGP Core financing in GEF-8. All GEF eligible countries not included in this PIF will be able to join the second tranche of SGP Core to be open to UNDP and selected Implementing Agencies later during the GEF-8 period.

It is noted that Belarus, Burkina Faso, Central African Republic, Comoros, Cote d'Ivoire, Dominican Republic, Liberia, and St. Lucia still have marginally higher than the permitted 10% of total country STAR allocation threshold as agreed in the SGP 2.0 Implementation Arrangements para 19. Please amend accordingly in the portal. in line with the SGP 2.0 Implementation Arrangements. On ?executing partner type?, please see the additional comments below.

4/20/2023: GRT. Not fully. The PIF meets the criteria for eligibility for GEF funding, responding to GEF-8 Programming Strategy and the SGP 2.0 Implementation Arrangements for GEF-8. However, UNDP should consider reducing the number of countries included in the PIF to follow the intention of the SGP 2.0 Implementation Arrangement. It is suggested that UNDP does not include new SGP countries (including Angola, Equatorial Guineas, Sao Tome and Principle, Azerbaijan, Somalia, and Montenegro), countries likely to be rejected (Belarus and Iran), and SGP upgraded countries that have SGP financing through separate FSPs with expected completion dates at least until June 2025. It is noted that the Palestinian Authority

has submitted an LOI and while not on the list of the GEF-8 144 eligible countries, the GEF accepts the inclusion. On ?executing partner type?, please see the comment below.

Agency's Comments

UNDP, 5/19/2023

The STAR amount of Sierra Leone has been revised accordingly to be exactly 10 percent of the total STAR. Please note that Sierra Leone was not originally included in the GEFSEC comments on 15 May 2022 under section 8.1?

UNDP, 18 May 2023

UNDP takes note of the Secretariat?s strong affirmation of the perceived ?need to reduce the number of countries in the PIF.? UNDP fully supports the ambition and intention of SGP 2.0 as set forth in the Implementation Arrangements paper, approved by Council last December. UNDP looks forward to working actively with the GEF family to promote a strong, coordinated, cohesive and forward-looking SGP 2.0.

UNDP notes the concern of the GEF Secretariat regarding the limited available funding for the June Work Program. The requests for STAR funding to ?top-up? or complement SGP Core resources are supported by the SGP Implementation Arrangements paper and point to the appreciation of the countries themselves for the impacts and efficiency catalyzed by direct access to financing by local communities.

UNDP fully supports and appreciates safeguarding the continuance of current SGP Country Programs and operations. This requires consideration of the ?do no harm? principle, building on a tested civil society-led mechanism, minimizing disruption and ensuring non-reversal of gains.

UNDP takes note of the request of GEFSec to reduce the number of countries in the Tranche 1 PIF due to the limited resources available, and after a careful review of proposed criteria against the need to safeguard continuance, resubmits the PIF with the understanding that those countries whose SGP funding is deferred from the Tranche 1 will be able to access the second tranche of SGP Core resources as directed in the Implementation Arrangements paper as soon as possible during the GEF-8 period. The number of countries in the Tranche 1 PIF has been reduced accordingly to 99.

The STAR amount for Belarus, Burkina Faso, Central African Republic, Comoros, Cote d'Ivoire, Dominican Republic, Liberia, and St. Lucia as per GEF comment and the SGP 2.0 Implementation Arrangements paper. UNDP notes that the 10 percent was calculated based on the initial GEF-8 STAR amount informed by the GEF Secretariat through the Initial GEF-8 STAR Country Allocations (GEF/C.63/Inf.05 July 1, 2022), in which the figures were rounded to the thousand. The amount is now adjusted using the Initial GEF-8 STAR Country Allocations under the GEF Portal, which includes figures to the cent.

UNDP, 12 May 2023

UNDP notes with appreciation that ?the PIF meets the criteria for eligibility for GEF funding, responding to GEF-8 Programming Strategy and the SGP 2.0 Implementation Arrangements for GEF-8.? UNDP has considered the potential reduction in the total number of countries included in the Tranche 1 PIF and wishes the GEF Secretariat to consider the following: Throughout the SGP 2.0 development process GEFSec and UNDP have lauded country ownership as a vital principle for establishment, design and implementation of SGP Country Programmes.

Earlier this year, a transparent SGP consultative process was initiated involving all countries, based on GEF/C.63/06/Rev.01 GEF SGP 2.0 Implementation Arrangements for GEF-8, to raise awareness of SGP 2.0 and the options open to them in deciding when they would wish to request and access SGP funding. 117 countries responded to this process with formal requests for inclusion in the Tranche 1 PIF, including letters of endorsement of STAR resources to ?top up their SGP grantmaking?, as encouraged by the Implementation Arrangements Paper approved by GEF Council.

Country Ownership. A decision to remove a country from the Tranche 1 PIF is a decision to be taken by the respective governments, who have formally requested UNDP to include them in the PIF after country level deliberations and have allocated STAR resources in line with their national GEF priorities. The process leading to the signature of the STAR Letter of Endorsement was carried out in collaboration with the multi-stakeholder SGP National Steering Committee (on which the GEF OFP sits and often chairs) and many times with the broader GEF National Steering Committee under the leadership of the OFP with the broad participation of local and national stakeholders.

The GEF policy on STAR allocations to SGP to top up grant resources represents a recognition of the importance of government support to locally led initiatives for sustainable development and the global environment. By deferring or denying the decisions by governments to allocate STAR resources to SGP, GEFSec unwittingly creates a disincentive for countries to support locally led action for the global environment.

For **new countries**: GEFSec has made universal access a priority, and some of these countries have requested to be included in SGP for a number of years, including Somalia that has allocated GEF-7 STAR as part of OP7 SGP. As such, the rationale for delaying their inclusion should be made clear by GEFSec and communicated to the countries in question.

For **Belarus and Iran**: we would be grateful for a communication from the GEF Secretariat as to the exclusion of these two countries from the Tranche 1 PIF, which could be transmitted by UNDP New York directly to the respective UNDP Country Offices in Minsk and Tehran. For **Upgraded Country Programmes**:

Increased risk of financial gaps. It would be prudent to avoid increasing the risk of programme financing gaps between GEF-7 and GEF-8, given the length of the project cycle from PIF submission to CEO endorsement/ProDoc Signature to initiation of implementation with a functioning civil society led SGP National Steering Committee and the launch of the calls for proposals. In those countries opting for NGO execution of their Country Programmes, the relevant capacity assessments and due diligence will be required, before the programme can start implementation. As reflected by the SGP Joint Evaluation, SGP Country Programmes executed under the NGO execution modality (Brazil, India and Philippines)

experienced gaps in financing because of delayed incorporation into the Work Programme. An arbitrary cut-off date of June 2025 increases the risk of gaps in financing leading to Country Programme shutdown and a hiatus in meeting community demands for grant funding with the resulting confusion and disorder in provision of grants to communities involved in landscape management.

Interruption of locally-led integrated programming. The UCPs under the FSPs/MSPs modality have been supporting locally led planning and management of key landscapes and seascapes for the past eight years in a deliberate process of incorporating more local stakeholders into landscape governance and management over time consonant with the development of their technical and organizational capacities and progress in ecosystem management. This growth in upscaling is dependent on the ready availability of a steady stream of grant resources; removal of UCPs from the Tranche 1 PIF runs the risk of deferring access to critical grant resources by Indigenous peoples and local communities.

Risk of reduced co-financing for upscaling. Upscaling is also dependent on co-financing from donors, private entrepreneurs, and national and local governments. Deferring funding to UCPs after an official request by government for inclusion in Tranche 1 accompanied by a STAR allocation does not send the right message to potential co-financiers about the seriousness of GEF support to locally led initiatives for the global environment and sustainable development. This runs the risk of discouraging co-financiers from supporting what needs to be a deliberate, thoughtful and adaptive process of participatory landscape-seascape management.

Lost opportunities for integrated programming. At the same time, deferring approval of GEF-8 funding to UCPs will result in diminished or delayed support to integrated programming for sustainable development and the global environment overall. For example, in three UCP countries - Bolivia, Egypt, Sri Lanka - governments made the decision to allocate STAR resources to SGP Tranche 1 via UNDP in order to use SGP?s governance and management mechanisms to efficiently deliver on-the-ground support in close coordination with Impact Programs and/or other FSPs.

Bearing the foregoing in mind, UNDP is not in a position to take a unilateral decision to remove countries from the PIF for Tranche 1. UNDP believes that the ?intention of the SGP 2.0 Implementation Arrangements? can be respected by recognizing the overriding importance of country driven-ness.

Finally, please note that while UNDP has informed the GEF Operational Focal Points in the countries affected by the GEFSec suggestion of excluding their countries from Tranche 1, we would strongly recommend GEFSec to contact the OFPs directly as to the rationale for exclusion of these countries. The OFPs are expected to provide their feedback directly to GEFSec on their desired course of action.

As communicated in the past to GEFSec, including through the SGP Steering Committee a wider consultative process should be conducted at both the global and country levels to seek inputs and better understand the implication of the new structure and operational modalities. This is in line with the most recent independent Joint UNDP-GEF Evaluation of SGP, which recommended UNDP and GEF to conduct a consultative process for the formulation of a long-term strategic vision for the SGP.

While the long-term visioning and strategic directions exercise is to be formally led by GEFSec, UNDP is committed to support a broader consultative process involving UNDP Country Offices and candidate SGP GEF Implementing Agencies, SGP National Steering Committees, CSO networks, Indigenous Peoples and other relevant stakeholders in the formulation of a long-term vision of SGP, with a focus on impacts, synergies, and scaling up across critical land and seascapes.

UNDP supports and stands ready to implement the SGP 2.0 as outlined in the GEF-8 Implementation Arrangement paper. A collaborative multi-agency process that can pilot, assess and adapt the proposed SGP 2.0 measures in response to country demand would be critical to allow scaling up with confidence and to avoid unintended consequences and reversal of any gains achieved over the last three decades.

SGP 2.0 should ideally involve multiple agencies working together at both global and country levels, and avoid disaggregating the Programme by arbitrarily distributing countries by agency: SGP 2.0 should be designed to offer all countries the opportunity to take advantage of multiple agencies? specialized technical expertise under a Joint Multi-Agency SGP Platform/Committee at both global and country levels, based on lessons learned from other similar GEF programs and projects. Having a different GEF Agency lead in each SGP participating country without coordination among agencies at the country level has the potential to create isolated SGP Country Programmes in different countries around the world.

For the countries that have oversubscribed their SGP STAR allocation, i.e. beyond 10 percent of their overall STAR allocation, the numbers have been adjusted as per GEFSEC comment and SGP 2.0 Implementation Arrangement paper.

2. Project Summary

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

Secretariat's Comments

5/15/2023: GRT. Comment addressed and revised text provided

Cleared

4/20/2023: GRT. Not fully. The summary describes problems to be addressed as well as project objectives and strategies to deliver GEBs and other expected results, including livelihood outcomes and emphasis on social inclusion of vulnerable and marginalized groups. However, the summary should reflect on how the project aligns and responds to the renewed ambition of SGP in GEF-8, including the new features outlined in the SGP 2.0 Implementation Arrangements. Please revise.

Agency's Comments

The following entry has been added to the Project Summary:

The proposed strategy reflects the key features of GEF Small Grants Programme 2.0, including new approaches to support youth, women and Indigenous Peoples, linking up with complementary mechanisms, such as the Microfinance Initiative and CSO Challenge Program, cooperating with other GEF Agencies, and leveraging opportunities with GEF strategies, including the delivery of the GEF-8 Integrated Programs. In addition, the project will facilitate opportunities for innovation and scaling up, catalyze multi-stakeholder alliances to test new approaches through CSOs, and leverage its dialogue platforms towards greater impact.

3 Indicative Project Overview

- 3.1 a) Is the project objective presented as a concise statement and clear?
- b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

Secretariat's Comments

5/18/2023

Comments are addressed and it is well noted that the grant ratio is in line with the SGP 2.0 implementation arrangements. This is now CLEARED. It is expected that at CEO Endorsement that this will be confirmed.

5/15/2023: GRT. Not fully. Additional explanation or clarification is needed.

Comments - iii) and iv) have been adequately addressed. However, the explanation provided regarding i) the grant ratio and caps; and ii) the financing amount for component 1, has not been adequately addressed by the Secretariat?s comments founded on the SGP 2.0 Implementation Arrangements. Concerns remain on the grant ratio not adhering to the 72% target. See below for detailed comments:

- i) The Implementation Arrangements establish that resources for ?Capacity development and technical assistance activities provided directly by the SGP Implementing Agency (i.e., in addition to activities funded by the grants provided directly to CSOs/CBOs) are capped at 3%,?. It remains unclear in the revised submission and explanations in the review sheet:
- a. where this capacity development/technical assistance percentage is reflected (this is clear for M&E, KM, and Grant components but not for this component).
- b. Is there a link between Component 1 ?Strategic Planning and Multi-Stakeholder Governance? and Capacity Development/Technical Assistance: and
- c. Regardless of whether there is a link or not, the percentage of 13% for component 1 out of the total financing amount, is still too high considering its scope and outputs as previously commented in the review sheet (and for which no explanation has been provided in the resubmitted PIF). Please explain and or amend further.
- ii) The resubmission still does not reach the grant ratio target of 72 % and while the information provided below begins to explain further, this is not reflected in the PIF. The GEF secretariat will be firm on this target as set out in the SGP 2.0 implementation arrangements. As such consider to:
- a. Transfer budget from Component 1 to Component 2, and/or;
- b. Provide a further breakdown of the budgets/activities to demonstrate grants across all components (and amend the financing table and provide details in the PIF accordingly)

4/20/2023: GRT. Not yet. While the objective includes the important components of the project, the statement should further elevate SGPs' important role to provide grant financing and technical assistance. It is also unclear what ?access and use appropriate knowledge? means. Please revise the statement, taking into consideration the following suggestion ?Local CSOs and CBOs in landscapes and seascapes around the world access grant financing and technical assistance, including capacity development and knowledge sharing to maintain and enhance their socio-ecological resilience, well-being and socio-economic conditions for Global Environmental Benefits?.

Overall, as stated, the components and outcomes are appropriate to achieve the project objective and indicators. However, further clarification and revision are requested with regard to:

- i) Links between the components and the targets and caps set out in the Implementation Arrangements, including the target for the grant ratio and the cap related to capacity development/ technical assistance (as presented it looks like component 1 (technical assistance) comes out to 12% and component 2 (investments/rants) to 67% which is less than the 72% target). The expected grant ratio needs to be clearly indicated.
- ii) Financing amount for component 1. This seems very high considering the scope and outputs and it is unclear whether this also includes capacity development and possible grants. Consider whether part of this financing could be assigned to Component 2, including grants and possibly capacity development. Please review and clarify.
- iii) Phrasing of component 2. This needs to better reflect that these investments are grants to CSO and CBOs i.e., demand-driven grants or direct financing to CSOs/CBOs. Also, consider rephrasing 2.1 project outcome and output i.e. replacing action with grants/financing, and ensure that 2.1.1 is articulated as an output (now it is articulated more as outcomes or even actions)
- iv) Note that PMC (10%) must be adjusted once the Total GEF Resources and the subsequent Total Project Costs have been adjusted.

Agency's Comments

UNDP, 18 May 2023

The proposed GEF project financing for Component 1 has been broken down into technical assistance and investment (grants), as suggested. With this breakdown, the total proposed GEF project financing earmarked for investments (grants) is 72% and TA/Capacity Building is 3% of the total project budget, in line with the SGP Implementation Arrangement paper.

UNDP, 12 May 2023

The project objective has been updated as per the suggestion made by the GEFSEC.

i) Grants are also envisaged under Components 1 and 3. For example, NGOs may be engaged under Component 1 to carry out and/or facilitate the participatory landscape-seascape baseline assessments, development of the landscape-seascape strategies, deliver capacity building to local CSOs and CBOs, and operation of the multi-stakeholder landscape-seascape platforms. Under Component 3, NGOs may also be engaged to develop and implement knowledge management and communications activities. The

expected grant ratio of the programme is 72%. The detailed budget breakdown will be made during the project preparation phase, prior to CEO endorsement.

- ii) Please refer to the response to comment (i). Grant financing is not only envisaged under Component 2.
- iii) Phrasing of Component 2 changed to: ?Demand-driven grants to CSOs/CBOs?. Outcome 2.1 rephrased to: ?Landscape-seascape strategic objectives advanced through community-led grants?. Output 2.1.1 rephrased to: ?Capacities of CSOs/CBOs strengthened for implementation of landscape-seascape strategies?.
- iv) This is noted. The value of PMC has been updated according to the adjusted value of the proposed GEF financing.
- 3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's Comments 5/15/2023: GRT

Cleared

4/20/2023: GRT. Not fully. Important considerations on gender equality and inclusion of other important stakeholders such as youth are incorporated in component 2. However, this should also be reflected in components 1 and 3 as well as for M&E. With regards to M&E outputs, it would be good to reflect the requirement on reporting the annual PIR, external evaluations, and audits as outlined in the SGP 2.0 Implementation Arrangements.

The project builds on 30 years of SGP experience. An overall approach to Knowledge Management and Learning has been provided in the Project Description and Component 3 is dedicated to KM&L. Proposal includes KM and capacity building deliverables that enable and enhance access to knowledge and information through peer-to-peer learning, learning by doing, and south-south exchanges using digital and other means. Taking into account also the SGP 2.0 Implementation Arrangements, please provide a brief description of the project?s plans related to communication and knowledge sharing, including outreach, awareness raising and dissemination of outputs/results to broaden the GEF SGP repository for access to information. Please revise accordingly.

Agency's Comments UNDP, 12 May 2023

Gender mainstreaming considerations have been added to the narrative descriptions of Components 1 and 3, as well as M&E.

Regarding knowledge management learning, the following entry has been added to the narrative description of Component 3:

Knowledge management and learning are integral parts of the SGP The knowledge obtained from project experiences and lessons learned will be socialized through SGP?s national, regional and global networks of stakeholders and broaden the GEF SGP repository, and it will be used in upscaling successful initiatives. The increased capacity of community-level stakeholders to generate, access and use information and knowledge is expected to increase the sustainability of project activities beyond the life of the grant funding. Targeted knowledge management and communications activities will aim to share lessons and experiences and showcase results of gender mainstreaming, as well as inclusion of vulnerable and marginalized groups.

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

4/20/2023: GRT. Yes. The PMC has been calculated in line with the SGP 2.0 Implementation Arrangements that caps PMC to 10% of the total project costs (net of Agency fee). Please note that updates might be needed based on revisions based on the comments provided above. Cleared

Agency's Comments UNDP, 12 May 2023

This is noted. The value of PMC has been updated according to the adjusted value of the proposed GEF financing.

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

4/20/2023: GRT. Yes. The current situation is clearly and adequately described and includes key barriers.

Cleared

Agency's Comments

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

5/15/2023: GRT

Cleared

4/20/2023: GRT. Mostly. The project incorporates the long history of successful community-based grant-making and lessons learned developed over 30 years of UNDP SGP implementation. It highlights the links with the GEF-8 strategy and programming directions and the centrality of local action and innovations in meeting global environmental goals. With its focus on CSOs and CBOs, it places a strong emphasis on women groups and women-led organizations and describes the role of MSMEs and partnerships with the private sector. The project should consider further describing the key role of youth and youth-led initiatives and organizations.

Agency's Comments UNDP, 12 May 2023

The following entry has been added to the PIF:

The SGP OP8 strategy also includes a concerted focus on engagement of youth and youth-led initiatives. Youth empowerment and knowledge have the potential to spark

transformational change, as young people become more and more engaged in sustainable development priorities, they are often leading global debates across digital platforms and are fully integrated in the digital economy. Over the last decade, youth has increasingly become an important target group of SGP as they are key stakeholders for current and future environment and sustainable development. SGP recognizes that active engagement of youth is vital to address the interlinked planetary crises and recognizes young people as the primary stakeholders, as well as future leaders and agents of change for sustainable development. Share of SGP projects with youth participation and led by youth tracked since 2015 grew to over 40%. To facilitate mainstreaming of youth empowerment, the majority (74%) of SGP countries appointed a Youth Focal Point to their National Steering Committees. Further, to become innovators and positive agents of change, young people need the right tools and knowledge. Building on the impactful experience of its dedicated innovation program, SGP will continue to invest in the capacity of youth, particularly the skills necessary for participation in the emerging green economy. The SGP OP8 youth approach will be realized through systematic piloting in participating countries. Interventions will include direct project level investments in priority landscapes-seascapes and will include both working with youth as individuals and as organizations/ networks/ councils tackling global environmental issues.

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

5/15/2023: GRT

Cleared

4/20/2023: GRT. Mostly. The theory of change describes the logic and causal pathways of the project, including how activities will address barriers and contribute to the outcomes and goal of the project. However, as commented above, the project objective and component 2 should be phrased more clearly, including outputs and outcomes. For clarity and consistency with the expected results, the descriptions should incorporate some specific linkages to the GEBs and core indicators expected to be achieved with this project.

Agency's Comments

UNDP, 12 May 2023

The theory of change has been updated with the revisions to the phrasing of the objective, Component 2, Outcome 2.1 and Output 2.1.1. Expected global environmental benefits have also been added to the theory of change schematic.

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 n/a

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 5/15/2023: GRT. Not fully

As noted previously, the project is envisaged to be executed under a direct implementation modality with the UNDP Bureau for Policy and Programme Support (BPPS) as the implementing partner. The PIF states there will be a firewall but does not confirm that these functions are sufficiently separate, in different departments. It is important that there is a clear separation of implementing and executing functions (within GEF Agency) in accordance with GEF Policy on Minimum Fiduciary Standards (see https://www.thegef.org/sites/default/files/documents/2022-

03/gef_policies_guidelines_fiduciary_standards_2022_02.pdf Para 2 (h)) that states that see cases where a GEF Partner Agency carries out both implementation and execution of projects, the GEF Partner Agency must separate its project implementation and execution duties). Please provide additional information on the lines of accountability from CPMT as executing entity to the ?Principal and Regional Technical Advisors? who will be supervising and overseeing the project.

4/20/2023: GRT. Mostly. It is noted the project is envisaged to be executed under a direct implementation modality with the UNDP Bureau for Policy and Programme Support (BPPS) as the implementing partner. Please clarify this further, including adherence to the required separation of implementing and executing functions (within GEF Agency) in accordance with GEF Policy on Minimum Fiduciary Standards. In addition, please further explain the envisaged efforts to draw lessons learned and possibly replicate NGO execution arrangements from experiences of upgraded country programs in GEF-6-7. Alignment with SGP 2.0 thematic priorities is well noted, but please elaborate further on potential cooperation with MEAs, including UNFCCC, UNCCD, and CBD as well as tentative linkages with the forthcoming Global Biodiversity Framework Fund (GBFF).

Agency's Comments

UNDP, 18 May 2023

Separation of implementing and executing functions is clarified below. This entry has been added to the PIF.

At the global level:

Oversight and quality assurance over the entire Programme at a global level will be provided through a dedicated unit within the Bureau for Policy and Programme Support (BPPS). The core oversight functions will be as follows:

(i) Representation at the Global Project Board: Executive Coordinator of the Vertical Fund Oversight and Programme Support Unit (VF Unit)

(ii) Programmatic Oversight and Quality Assurance: Senior Technical Advisor (VF Unit)

Execution support: the Central Programme Management Team (CPMT) will manage and coordinate execution functions, including coordinating and providing coherent technical guidance and support to country execution staff in the participating countries (who are distinct from the staff engaged in oversight functions).

At the National Level:

Implementation Arrangements at the national level will be determined on a case-by-case basis for each participating country. This will be guided by appropriate due diligence at the level of the UNDP Country Office and capacity assessments (PCAT/HACT) at the level of potential external local executing entities (NGOs). The appropriate implementation modality will also depend on the volume of funding available for the country in question, yet the intention is to build on experience gained from some

Upgraded Country Programmes (GEF-6 and GEF-7), and the SGP 2.0 Implementation Arrangement, which encourages Implementing Agencies to work with local executing entities.

The following options will be explored and confirmed during the CEO Endorsement Request development:

- (i) <u>If Direct Implementation (DIM) by UNDP CO</u>: Oversight and execution functions in the country office will be institutionally segregated and separate reporting lines will be maintained in line with the Internal Control Framework (ICF) of UNDP, as follows:
- a. Representation on National Steering Committee: UNDP CO RR
- Programmatic oversight and quality assurance: Environmental Focal Point within the programmatic unit of the UNDP CO (with reporting line to the DRR/Head of Programmes)
- Execution support: SGP Country Programme Team, consisted of National Coordinator and Programme Assistant (as relevant)
- (ii) <u>If NGO execution</u>:
- a. Representation on National Steering Committee: UNDP CO RR
- Programmatic oversight and quality assurance: Environmental Focal Point within the programmatic unit of the UNDP CO (with reporting line to the DRR/Head of Programmes)
- c. Execution support: NGO

UNDP, 12 May 2023

Regarding the direct implementation modality (DIM), there will be a clear firewall between delivery of project oversight and quality assurance performed by UNDP and project execution. Project oversight and quality assurance will be provided by the UNDP Principal and Regional Technical Advisors. Project execution will be led by the Central Programme Management Team (CPMT) and options for national delivery will be explored at country, regional and global levels during the project preparation phase prior to CEO endorsement. Institutional arrangement options will be carefully assessed and determined during the CEO endorsement stage to ensure there is no reversal of gains in SGP implementation and to ensure seamless transition without major gaps from OP7 to SGP OP8 operation.

One example of lessons learned and experiences gained from the GEF-6 and GEF-7 upgraded country programmes is the benefit of engaging NGOs through grant arrangements, to deliver specific support services, including knowledge management, partnership building and value chain development, and facilitation of participatory landscape-seascape baseline assessments, formulation of landscape-seascape strategies, and multi-stakeholder platforms.

The following entry has been added to the ?Coordination and Cooperation with Ongoing Initiatives and Projects? sub-section under Section B of the PIF.

Potential cooperation with MEAs and tentative linkages with the Global Biodiversity Framework Fund (GBFF). The country programme strategies and landscape-seascape strategies in relevant countries will be aligned with relevant MEAs, e.g., alignment with specific priority actions in National Biodiversity Strategies and Action Plans (NBSAPs), Land Degradation National Target Setting Programmes, climate change mitigation in the agriculture, forestry and other land use (AFOLU) sector, etc. The sustainability of the landscape-seascape strategies (and country programme strategies) largely depends on durable partnerships and opportunities for additional financing. The GBFF may provide opportunities for replication and upscaling of results achieved under OP8 in alignment with the Kunming-Montreal Global Biodiversity Framework.

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

5/15/2023: GRT

Thank you for the additional explanations and considerations.

Cleared.

4/20/2023: GRT. Yes. They are based on the experience of previous phases and the number of participatory countries. Note that if any changes to the number of countries in the PIF these need to be adjusted.

It is noted that Core Indicator 6 on GHG emission mitigated is not used. In the development of CEO endorsement, please consider using it given emission mitigation may come as a result of planned results in areas linked to supporting biodiversity and land restoration.

it is noted on Core Indicator 11. on Direct beneficiaries that the number is very large. Please review the number to ensure it includes only direct beneficiaries. Pages 24-25 of the GEF-8 Results Measurement Framework Guidelines (GEF/C.62/Inf.12/Rev.01) provide examples of what might be counted as direct beneficiary

Agency's Comments UNDP, 12 May 2023

On Core indicator 6, SGP is currently piloting an innovative methodology for estimating mitigation benefits generated through community projects in line with recommended GEF approaches. While it is not feasible to provide a GHG mitigation target at this stage, SGP will test the methodology and determine the possibility of including relevant figures at the time of CEO endorsement.

Regarding Core Indicator 11, the end target has also been revised to 550,000, consistent with the GEF guidelines on the implementation of the GEF-8 Results Measurement Framework, specifically regarding direct beneficiaries receiving a high intensity of support. For SGP OP8, examples of direct beneficiaries include people receiving training on sustainable agricultural practices, people provided with access to cleaner energy, and people gaining livelihood benefits through sustainable utilization of agrobiodiversity. These are only a few examples. Further details will be articulated during the project preparation phase prior to CEO endorsement.

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) Are climate risks and other main risks relevant to the project described and addressed within the project concept design?
- b) Are the key risks that might affect the project preparation and implementation phases identified and adequately rated?
- 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

5/15/2023: GRT. Cleared

4/20/2023: GRT. Partly. In the table provided, it would be helpful to better differentiate risks to project preparation and risks to implementation on (1) politics and governance and (2) Strategy and Policies. Also, it seems that comments on the risks focus more on internal

project design processes than on risks associated with the theory of change. The table references the SESP (uploaded as an annex), but it would be useful if a brief summary is incorporated into the table for reference and clarity. Specific climate risks to the project are not included. The above should be further clarified or elaborated on further.

Agency's Comments UNDP, 12 May 2023

The comments in the risk matrix on Politics and Governance and Strategy and Policies risks have been expanded, with discussion on risks to project preparation and implementation.

The specific risks in the preliminary SESP (Annex D to the PIF) have been added to the risk matrix in the PIF. Information has not been summarized in the PIF to avoid duplication, as is standard practice across UNDP?s PIF submissions.

With regard to climate risks, specific risks cannot be identified at this stage given the size and scope of the program. Climate and disaster risks will be further explored and elaborated during the project preparation phase and implementation, in line with UNDP SES policy and good practice. For example, the participatory baseline landscape-seascape assessments will address climate and disaster risks and proposed management measures will be described in the landscape-seascape strategies and/or country program strategies.

5.7 Qualitative assessment

- a) Does the project intend to be well integrated, durable, and transformative?
- b) Is there potential for innovation and scaling-up?
- c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's Comments

4/20/2023: GRT. Yes.

The project is based on 30 years of cumulative experience, results, and lessons learned. It is well noted also that the PIF identifies the GEF-8 Integrated Programs as an opportunity for scaling up and the role of the SGP landscape approach and Country Program Strategies to contribute to improved alignment of national policy beyond. These elements are expected to be further developed and articulated prior to CEO Endorsement.

Agency's Comments

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

6.1 Is the project adequately aligned with focal area and integrated program strategies and

objectives, and/or adaptation priorities?

Secretariat's Comments

4/20/2023: GRT. Yes. The project is aligned with the SGP 2.0 thematic priorities as

outlined in the GEF-8 Strategy and programming directions. The project references GEF-

8 focal area strategies and Integrated Programs. Further details on the project alignment

are expected to be incorporated and articulated prior to CEO Endorsement.

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 Comments

4/20/2023: GRT. Yes.

More detailed descriptions of alignment and contribution to MEAs, including UNFCCC,

UNCCD, and CBD as well as tentative linkages with the forthcoming Global Biodiversity Framework Fund (GBFF) are expected to be incorporated and articulated prior to CEO

Endorsement.

Agency's Comments

UNDP, 12 May 2023

This is noted. More detailed descriptions and contributions to MEAs, as well as possible

linkage with the GBFF will be incorporated in the Project Document and CEO

Endorsement Request.

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

5/15/2023: GRT. Cleared

4/20/2023: GRT. Not yet

This project expects to generate biodiversity benefits but does not explicitly reference the Kunming-Montreal Global Biodiversity Framework and as such please add this information in the PIF.

Agency's Comments UNDP, 12 May 2023

The following entry has been added to Section C of the PIF:

The envisaged biodiversity outcomes of SGP OP8 are closely aligned with the goals of the Kunming-Montreal Global Biodiversity Framework (GBF), and the program is expected to make contributions towards achievement of a wide range of GBF targets, including targets 1, 2, 3,4,5, 7, 8, 9, 10, 11, 14, 19, 20, 21, 22, and 23.

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments 4/20/2023: GRT. Yes.

Agency's Comments

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

Secretariat's Comments 5/15/2023: GRT. Cleared

4/20/2023: GRT. Mostly.

It is assumed that this project builds on previous phases of SGP engagement with IPLCs and civil society organizations. Information is provided on consultations with regard to obtaining LOEs and LOIs and the PIF incorporates plans for stakeholder engagement during project inception and implementation. CSOs are marked as stakeholders consulted but no information on these consultations is provided. It is unclear whether the development of this PIF included any renewed and targeted consultations with these key stakeholders. In addition, the PIF does not include any specific plans or activities to consult with these key stakeholders during project preparation prior to CEO endorsement. Further clarification and explanation are required to describe activities on how this first tranche of SGP as part of SGP 2.0 will consult key stakeholders as part of project development.

Agency's Comments UNDP, 12 May 2023

During the PIF stage, CSOs were consulted and actively engaged through the SGP National Steering Committees. The decision-making processes that led to the signature of the STAR LOE?s were carried out in collaboration with the SGP National Steering Committees, and as relevant with the GEF National Steering Committees under the leadership of the OFP, with wide participation of local and national stakeholders.

A robust stakeholder consultation plan will be developed and implemented during the project preparation phase with active engagement of CSOs, Indigenous Peoples, government, and others prior to CEO endorsement. These consultations will be designed in a way to initiate the multi-stakeholder collaborative action needed for achieving the integrated landscape-seascape approaches in the target countries.

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

5/15/2023: GRT. Not fully. See the above comment that Belarus, Burkina Faso, Central African Republic, Comoros, Cote d'Ivoire, Dominican Republic, Liberia and St. Lucia still have marginally higher than the permitted 10% of total country STAR allocation threshold as agreed in the SGP 2.0 Implementation Arrangements para 19. Please amend accordingly in the portal. in line with the SGP 2.0 Implementation Arrangements

4/20/2023: GRT. Mostly.

However, the PIF includes several countries that have oversubscribed their SGP STAR allocation. The numbers for these countries need to be revised in line with the SGP 2.0 Implementation Arrangements para 19 (iii).

Agency's Comments

UNDP, 18 May 2023

As noted above, the STAR amount for Belarus, Burkina Faso, Central African Republic, Comoros, Cote d'Ivoire, Dominican Republic, Liberia, and St. Lucia are adjusted accordingly. UNDP notes that the 10 percent was calculated based on the initial GEF-8

STAR amount informed by the GEF Secretariat through the Initial GEF-8 STAR Country Allocations (GEF/C.63/Inf.05 July 1, 2022), which the figures were rounded by the thousand. The amount is now adjusted using the Initial GEF-8 STAR Country Allocations under the GEF Portal, which includes figures to the cent.

UNDP, 12 May 2023

The STAR amount for the countries that have exceeded 10 percent of the overall STAR allocation have been adjusted in line with the SGP 2.0 Implementation Arrangement paper.

Focal Area allocation?

Secretariat's Comments

5/15/2023: GRT.

Cleared

4/20/2023: GRT. See above comment

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's Comments n/a

Agency's Comments SCCF A (SIDS)?

Secretariat's Comments n/a

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

Secretariat's Comments n/a
Agency's Comments Focal Area Set Aside?
Secretariat's Comments n/a
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 n/a
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 4/20/2023: GRT. Yes
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 5/15/2023:
Cleared
4/20/2023: GRT.

Note. The 117 OFPs at the time of PIF submission name and position has of yet not been checked against the GEF database

Agency's Comments UNDP, 12 May 2023

The list of OFPs have been checked by the Agency against the GEF Database, at the time of receiving the letter and submission as per following link: Focal Points | GEF (thegef.org)

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

Secretariat's Comments

5/15/2023: GRT

The revised LOEs have been attached as one PDF - please provide these in separate documents if possible

4/20/2023: GRT. Yes

OFP LOEs are uploaded separately but note the comments below.

Agency's Comments

UNDP,

UNDP, 18 May 2023

The revised LOEs are individually attached under the designated section. The revised/updated LoEs from 15 countries are also compiled as separate file from the rest of the LoEs, and uploaded to the GEF Portal.

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

Secretariat's Comments

5/15/2023: GRT. Not fully

We note that a number of LOEs have been resubmitted (however these are not attached in separate attachments and please provide these separately). We also take note that there are no new LOEs for Bangladesh, Brazil, Congo DR, and Jamaica. These need to be resubmitted. In addition, the Comoros has fully exhausted its CC and LD STAR allocation and thus this contribution to SGP has to come from BD allocations. Please revise PIF portal and request a renewed LOE to indicate that SGP funds will be allocated from BD only.

5/1/2023: Not yet. Please note and address the following

- i. Bangladesh LOE is not the right template:
- ii. Ecuador: small typo in the LOE, project grant amount indicated as \$917,413 instead of \$917,431 in Portal. Fee and total financing are correct. So suggest to accept this LOE.
- iii. Timor Leste: The LOE doesn?t specify Agency fee in \$ amount:
- iv. Vanuatu: the LOE doesn?t specify Agency fee in \$ amount, also it indicate LD STAR Allocation as sources of funds while in Portal, it is BD STAR.
- v. Brazil LOE was signed by the previous OFP:
- vi. Congo DR: the LOE doesn?t specify Agency fee in \$ amount. However, Congo DR allocation in Portal is zero.
- vii. Bahamas: LOE?s LD break-down between project financing and fee is wrong at 9.4% fee, Portal?s breakdown is correct:
- viii. Belarus: fee in LOE is wrong and higher than in Portal => suggest to accept LOE and Portal.
- ix. Belize: wrong total grant amount and fee in LOE:
- x. Benin: wrong IW money included in LOE
- xi. Burkina Faso: wrong amount and fee in LOE, correct in Portal, total financing match. However, LOE was signed by old OFP.
- xii. Burundi: no break-down between grant amount and fee in LOE:

xiii. Cameroon: no break-down of amount vs fee in LOE:

xiv. Central African Republic: sources of funds break-down by focal area are different in LOE from Portal?s entry. A revised LOE to match with Portal entry is required

xv. Comoros: LOE uploaded but zero allocation in Portal.

xvi. No LOE is found for Eritrea.

xvii. Jamaica: wrong break-down of amount vs fee in LOE even-though total costs match with Portal entry:

b. Some LOEs indicate other executing entities than UNDP. Given the tentative implementation arrangements at PIF stage, please add Other Executing Partner or TBD in the General Information Section:

Agency's Comments UNDP, 18 May 2023

Updated LoEs from Bangladesh, Brazil, Congo DR, Jamaica, and Comoros are attached. It is to be noted that Congo DR OFP has recently revised and made adjustments to all LoEs for the entire GEF-8 portfolio, including FSPs, MSPs, and SGP. With these adjustments, UNDP notes that the country intends to allocate \$2.5m to SGP as stated in the revised LoE dated May 16 2023 and uploaded in the portal. However, only \$536,447 is currently available through the GEF Portal, Therefore, the submitted PIF through the GEF Portal reflects the amount of \$536,447 STAR from Congo DR as available in the GEF portal at this point.

UNDP, 12 May 2023

Updated letters are received from all concerned countries and attached (Cameroon, Benin, Burkina Faso, Burundi, Central African, Timor-Leste, Belize, Bahamas, and Eritrea), besides Brazil, DR Congo, Jamaica, and Bangladesh. Please note that in these countries OFPs have been alerted, and updated letters are expected to be received in the coming days before the deadline of constituting the June Work Program. UNDP will share/submit the updated letters to GEFSEC as soon as they are received.

Other Executing Partner is added in the General Information Section:

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 n/a

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

4/20/2023: GRT. Yes

The project notes that the priority landscapes-seascapes in each participating country will be identified through participatory processes during the inception period. It also states that landscape/seascape strategy component initiatives will be geolocated.

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

4/20/2023: GRT. Yes the safeguard screening has been completed and the SESP has been uploaded to the portal

Cleared.

Agency's Comments

Annex E: Rio Markers

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

Secretariat's Comments N/a

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments

4/20/2023: GRT.

Yes Cleared

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 n/a

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments 5/15/2023: GRT. Not yet

This project is yet not technically cleared. Please clarify, respond, and address new comments provided

4/20/2023: GRT. Not yet

This project is yet technically cleared. Please clarify, respond, and address the above comments

Agency's Comments UNDP appreciates the comments provided by the GEF Secretariat. We have addressed them under each section. We stand ready to provide any further clarification as needed.

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

Secretariat's Comments

Agency's Comments

Review Dates

	PIF Review	Agency Response
First Review	4/20/2023	
Additional Review (as necessary)	5/5/2023	
Additional Review (as necessary)	5/18/2023	
Additional Review (as necessary)	5/19/2023	
Additional Review (as necessary)		