

Leveraging Eco-Tourism for Biodiversity Protection (LETBP)

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

10217

Countries

Dominica

Project Name

Leveraging Eco-Tourism for Biodiversity Protection (LETBP)

Agencies

World Bank

Date received by PM

6/16/2021

Review completed by PM

2/25/2022

Program Manager

Sarah Wyatt

Focal Area

Biodiversity

Project Type

FSP

PIF

CEO Endorsement

Part I ? Project Information

Focal area elements

1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?

Secretariat Comment at CEO Endorsement Request

2/24/2022

Yes.

11/11/2021

No, it is important to remember that the primary objective of this project should be the conservation of globally significant biodiversity and not tourism promotion or even supporting indigenous peoples (as much as the latter is important). Therefore, there needs to be clear logic about how each activity will lead directly to improved conservation outcomes. In examining those causal pathways, it will also be important to consider possible other (negative) results of those same actions. For example, we have seen where improved livelihoods result in more hunting (e.g. fines no longer are as scary) or improved agricultural efficiency/better prices/etc actually results in increased pressures on forests because the land is now more valuable.

Agency Response

02/17/22

project paper was revised to address these questions and uploaded for resubmission.

12/08/2021

Thank you. Project paper was revised to address your comments. Please see Project paper in track changes in the roadmap.

Project description summary

2. Is the project structure/design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?

Secretariat Comment at CEO Endorsement Request

2/24/2022

Yes.

2/23/2022

No, please address the following:

- As discussed previously, component 2.1.2 remains a seemingly unrelated set of activities. It is unclear how user surveys will increase the knowledge base on biodiversity. While we can and do support survey work, it would be managed by a different set of people than the interpretive information so it is unclear why these have been put together. Please prioritize Dominicans throughout the component and the actions to be developed.

11/11/2021

No, please address the following:

1.1 - There are activities listed in Annex 7 (specifically para 4) that are completely missing from anywhere else. These activities are quite important to socialize and create support in politics and in policy for sustainable practices and conservation. There is extensive analysis on the economic value of the environment for CEO Endorsement already, but it does not appear the project plans to use any of that.

2.1 - The connection of these activities to the overall goal is not adequately articulated. It does not appear that lack of visitor knowledge is one of the barriers to effective conservation. It is also worth noting that visitor knowledge is fleeting in impact and time and needs to be done continuously. Some these activities are not well justified for their connection to biodiversity. It also appears that there are multiple very separate sets of activities - in the Table B provided in the Portal there are 3 subcomponents while in the other documents there are only 2.

2.1 - Allocation of user fees - If the GEF is going to support the infrastructure needed to implement user fees, there needs to be assurances that these will go to support the parks or at the very least the environment. As of now, there is no discussion about where these user fees will go.

3 - Again, this feels like three subcomponents and is listed as such in the Portal, but is only two in the Project Paper. It is important that these activities again link back to biodiversity

conservation as well as actually being viable livelihood options. USAID has produced important work on Conservation Enterprise that would be very helpful to inform the design of these activities.

3.1 - Land use mapping/planning is described in the text but not listed in the subcomponent.

3.2 - While indigenous knowledge preservation is a laudable activity, it needs to be grounded in the realization of GEBs. It is also worth noting that these are often skills that need to be practiced regularly to be maintained and repeatedly to get good at, so a sustainability strategy is crucial.

Agency Response

12/08/2021

Thank you,

1.1..Please see revisions to Annex 7 to align with presentation in body of project paper.

2.1. Please see revisions to body of project paper, to Theory of Change and to Annex 7 to better detail project design in pursuit of expected outcomes.

2.1. The presentation on reinvestment of user fees in PA management has been strengthened.

3. Data sheet revised in line with component description in project document.

3.1. Corrected.

3.2 See updated inputs on project sustainability and recasting of sub-component 3.2 as ?Sustainable Ecological Livelihoods?.

3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Co-financing

4. Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat Comment at CEO Endorsement Request

11/11/2021

Yes.

Agency Response

GEF Resource Availability

5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?

Secretariat Comment at CEO Endorsement Request

11/11/2021

Yes.

Agency Response

Project Preparation Grant

6. Is the status and utilization of the PPG reported in Annex C in the document?

Secretariat Comment at CEO Endorsement Request

11/11/2021

Yes.

Agency Response

Core indicators

7. Are there changes/adjustments made in the core indicator targets indicated in Table E? Do they remain realistic?

Secretariat Comment at CEO Endorsement Request

3/2/2022

Yes.

2/24/2022

Yes.

2/23/2022

No, please address the following:

- ExACT - No new ExACT file was uploaded despite comments being provided via email. Why are the 8,102 hectares of landscapes under improved management to benefit biodiversity (CI 4.1) are not considered in the calculation of GHG emission mitigated? Please clarify the numbers so that we see them consistent throughout the information provided as they appear slightly different in the project description para 61 (1.2 million tCO₂e and 50,000 tCO_e per year) and the Annex 5 and Portal (1.1 million tCO₂e and 55,000 tCO_e per year).

11/10/2021

No, please address the following:

- Indicator 1 - Include a METT score or a plan to include one. Currently, the hectare numbers are recorded. Please note that unless the separate parks are managed as a single unit, we would generally expect to see a METT score specific to each PA.
- Indicator 2 - Please remove the zeroes.
- ExACT - Please provide the full spreadsheet as an attachment for review.

Agency Response

03/02/22

comments below are addressed

12/08/2021

Thank you

Baseline METT scores are recorded in the core indicators

Zeros are automatically added by WB Operations Portal online Results Framework tool, cannot remove.

ExACT is uploaded in the GEF portal roadmap

Part II ? Project Justification

1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

Secretariat Comment at CEO Endorsement Request

2/24/2022

Yes.

11/11/2021

No, it would be good to have some description of the specific barriers to conservation that this project seeks to address.

Agency Response

12/08/2021

Specific barriers and constraints have been re-emphasized throughout project paper.

2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?

Secretariat Comment at CEO Endorsement Request

11/11/2021

Yes.

Agency Response

3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?

Secretariat Comment at PIF/Work Program Inclusion

2/23/2022

Yes, though this will need to be elaborated during inception.

11/11/2021

No, more information and clarity is needed as noted previously.

Agency Response

3/2/22

thank you, will be elaborated.

12/08/2021

Please see revisions throughout the project document corresponding to the above comments

4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, currently the project does not align with the GEF-7 biodiversity strategy and the approaches contained there. It could be helpful for the project proponents to review the short sections on protected areas and mainstreaming.

Agency Response

12/08/2021

Please see language in paragraph 16 for information on how GEF Biodiversity Strategy is central to project design, as well as revisions in the Project Paper

5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?

Secretariat Comment at CEO Endorsement Request

11/11/2021

Yes.

Agency Response

6. Is there further and better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, please address the following:

- The language in paragraph 68 is dismissive of the value of this project and should be changed to highlight the benefits that the project does provide.
- Biodiversity Hotspots - Basically all SIDS are in a biodiversity hotspot, so that doesn't really help.
- KBAs - These are one of the best approaches to identifying sites of conservation importance and should be highlighted in this text. It is an easy shorthand for demonstrating value.
- Please include the ExACT file as an attachment.

Agency Response

12/08/2021

Thank you for your comments and suggestions. Please see revisions to Paragraph 69 (updated project paper). in addition, find ExACT file uploaded in the roadmap

7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?

Secretariat Comment at CEO Endorsement Request

2/24/2022

Yes.

2/23/2022

No, the project described in the sustainability section does not match the project described in Annex 7 or other overviews of components.

- The sustainability section refers to "Component 1 aims in part to address existing weaknesses at the policy level by enhancing the integration of PA planning and management in key national processes to support the development of a more robust policy framework ? particularly focused on intersectoral collaboration ? that promotes protection and conservation of PAs and embeds sustainable forest management in cross-sectoral policies (such as land-use planning, agricultural development policies, etc.)" This sounds like an excellent plan. However, there are two subcomponents of component 1 listed in

Annex 7: "Strengthening the institutional framework for PA planning and management & Improving national and local capacities for PA monitoring and management". Neither of these relates to sustainable forest management or agricultural policies

Note: The documents now seem to use the phrase "undertaken with GEF project financing or with identified co-financing" multiple times. Is there a particular meaning to this? All project activities should be undertaken with GEF financing or co-financing. It is generally only necessary to note when co-financing is supporting activities that the GEF does not typically support.

11/11/2021

No, more thought needs to be given to the sustainability of project activities and results and scaling up.

Agency Response

12/08/2021

Please see amendments to presentation of Project Components as well as to Sustainability presentation in Section III (c) (revised Project Paper)

Project Map and Coordinates

Is there an accurate and confirmed geo-referenced information where the project intervention will take place?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/10/2021

No, please include some specific information even as text about where the project will specifically work.

Agency Response

12/08/2021

See Project Map annex updated with text description on project areas of intervention

Child Project

If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?

Secretariat Comment at CEO Endorsement Request

NA

Agency Response

Stakeholders

Does the project include detailed report on stakeholders engaged during the design phase? Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes. However, it will be important to remain driven by the priorities and approaches of the Kalinago throughout.

11/10/2021

No, while extensive stakeholder consultations and plans have been discussed, please include information on the plans for during implementation in the Portal. It is also important that the Kalinago people as well as other stakeholders (even the private sector) are described and treated not just as beneficiaries, but as co-creators of the project and its specific activities.

It is also important to reexamine the language and likely the approach to working with the Kalinago. The language sounds quite old fashion as though they are just consulted beneficiaries rather than co-creating project activities. While it is understandable that consultations are difficult with COVID, it is important to discuss how the Kalinago have and will shape the project itself.

Paragraph 57 says "the goal is to boost nature-based tourism" which it is not and this is a challenge throughout the framing and approach of this project.

Agency Response

3/2/22

yes, thanks, noted

12/08/2021

See revised description in data sheet and in project paper. Importantly the Stakeholder Engagement Plan has been updated to reflect additional consultations in September and October and will be disclosed presently.

The language has been adjusted to clarify that key project beneficiaries are project co-creators.

Gender Equality and Women's Empowerment

Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities? If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?

Secretariat Comment at CEO Endorsement Request

11/10/2021

Yes, thank you for the thorough analysis.

Agency Response

Private Sector Engagement

If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, there is a description of incentivizing the private sector "to improve their existing product". However, there are missing steps in the causal chain and significant assumptions that the proposed activities will lead to the desired results. An improved tourism product could mean building larger buildings, cutting down trees to create a view, and installing large swimming pools that use significant water and chemicals. It's unclear what the incentive system would look like and why that is something the GEF should support.

Working with the private sector and various tourism providers is crucial for the success of a project like this, but it will be important that at least some of these stakeholders are involved in the design and not just viewed as beneficiaries.

Agency Response

12/08/2021

Please see revised language in data sheet and in project paper including specific interventions to reduce the likelihood of perverse incentives that would contribute to environmental degradation instead of the project goals of biodiversity conservation.

Risks to Achieving Project Objectives

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/10/2021

No, while the evaluation of ESRS and climate risks are quite helpful, it would be good to consider some of the non-safeguard type of risks that may be specific to this project and its implementation and how the project will work to mitigate these through its design.

Agency Response

12/08/2021

This section is not part of the WB GEF online template, in accordance with the harmonized procedures between Bank and GEF risk description beyond ESRS is included in the Bank PAD/Project Paper only - Key risks that have been assessed higher than ?moderate? are presented in detail in the project paper, Section IV, and will be monitored in detail throughout project implementation.

Coordination

Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, it would be good to include opportunities for coordination with Caribbean or other initiatives outside of Dominica. Also, there are possibilities to work with the GEF SGP on

the small business support to the Kalinago and/or any government ministry supporting small businesses.

Agency Response

12/08/2021

The language on institutional arrangements in Section III has been updated to reflect coordination priorities, including engagement with Caribbean-wide bodies and with specialized GEF units.

Consistency with National Priorities

Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?

Secretariat Comment at CEO Endorsement Request

11/11/2021

Yes.

Agency Response

Knowledge Management

Is the proposed Knowledge Management Approach for the project adequately elaborated with a timeline and a set of deliverables?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, there is little discussion of knowledge management and in particular to learn from and then share back out to the wider Caribbean and conservation communities.

Agency Response

12/08/2021

Language in Section V(B) has been updated to reflect that knowledge sharing within the Caribbean and wider conservation communities will be an integral part of the project's knowledge management approach.

Environmental and Social Safeguard (ESS)

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

Secretariat Comment at CEO Endorsement Request

11/10/2021

Yes.

Agency Response

Monitoring and Evaluation

Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, while the M&E plan is fine, basically all of the indicators are about quantity and not quality. The number of completed plans is not in and of itself a great indicator. Besides, it may be better to have fewer more manageable plans than many separate ones but such an indicator would not acknowledge this. It would be good to have some more indicators that speak to outcomes or at least intermediate between output and outcomes.

Agency Response

12/08/2021

The M&E plan was developed through significant consultation with key ministries (Environment, Agriculture, Tourism) and focal points on the technical working group, and the outcomes currently specified are ones that can be readily monitored and reported on in line with Dominica's M&E capacity. The technical working group will look to identify other potential indicators to complement the Results Framework during project implementation.

Benefits

Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, there is extensive description of socioeconomic benefits but not how they will result in GEBs.

Agency Response

12/08/2021

Please see revisions to Section V(D) of project paper.

Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request

3/2/2022

Yes. We note that M&E is be funded by co-financing and, therefore, is not in the GEF budget but it has been budgeted for.

3/2/2022

No, please address the following:

- Co-financing: Finance ministry submitted a co-financing letter listing all 3 ministries? in-kind contribution as well as the private sector in-kind amount. A Ministry cannot provide co-financing document on behalf of a private entity. Please ask the Agency to either get the letter from the private entity or to remove it

- Core Indicators: Please report the GHG emissions benefits in CI 6.1 rather than 6.2.

Annex A ?Project Results Framework?:

•GEF Core Indicator 11 (Beneficiaries disaggregated by gender) target is included as total, not disaggregated by gender. Please include a sentence that it is 50% women and 50% men.

•GEF Core Indicator 1 (Terrestrial protected areas, ha) ? please include CEO-Endorsement level targets, aligned with those targets found in Core Indicator Table

- GEF Core Indicator 6 (GHG emissions) ? please include targets
- Core Indicator Table:
- Can you please un-click the GEF Core Indicator 2 (Marine protected area) as there are no values on it
-
- - Knowledge Management : We note that knowledge management related activities are described in the Knowledge and information section on page 27 in the PAD, and budget for knowledge management will be a part of the Component 4, Project management. It is, however, not clear an allocation for the budget for knowledge management in the Annex 8: summary of procurement activities during project implementation (page 85-89). We assume that the part of budget for monitoring and evaluation in the Monitoring & Evaluation Strategy and Budget paper will be knowledge management. Please clarify with WB whether the budget information for the knowledge management activities is available for this project and clarify that in the Monitoring & Evaluation Strategy and Budget paper or others.
-
- - Monitoring and Evaluation (M&E): per Guidelines, at CEO Endorsement ? *The M&E plan and related budget are required for projects, inclusive of data source and responsible entity for data collection.* ? Recognizing that the Portal template in Portal for World Bank projects does not demand information on M&E (as it is the case for all other Agencies in Section 9), normally in Table B there is a component namely M&E that describe the activities related with monitoring and evaluation. For this project there is no information on M&E activities neither any line in the budget table. Please ask the Agency to amend.

2/24/2022

Yes.

11/11/2021

No.

Agency Response

03/02/22

Cofinancing: Identified private sector co-financing (US\$296,697) is removed from the project information given the likely significant delays it would take to receive a letter from the private entity.

- Core Indicators: GHG emissions benefits are fully reported in CI 6.1, thank you
Annex A ?Project Results Framework?:

GEF Core Indicator 11 is adjusted, the sentence is added that it is 50% women and 50% men. This indicator is represented by 2 indicators in the Results Framework: Beneficiaries trained in sustainable and gender inclusive National Park Management (200 people) and Beneficiaries of livelihood opportunities through the cooperative and propagation center (250 people)

GEF Core Indicator 1 (Terrestrial protected areas, ha) ? GEF Core Indicator 1 has been added as an intermediate results indicator in the Results Framework (total area)

GEF Core Indicator 6 (GHG emissions) ? GEF CI 6 has been added as an intermediate results indicator

Core Indicator Table:

We cannot un-click the GEF Core Indicator 2 (Marine protected area) , GEF Portal does not allow to remove it from the list

- Knowledge Management : Thank you for this comments. Knowledge management activities will be undertaken by the PIU funded by a dedicated budget line that is financed through identified co-financing. As such it is not reflected in the project budget.

- - Monitoring and Evaluation (M&E): Please see the M&E plan and budget uploaded in the GEF portal on February 24, 2022. The plan notes that ?The systems in place within the current PIU structure will be used to track, manage, and disseminate knowledge generated, and the PIUs communications and knowledge management officer (supported through government co-financing) will be the central focal point in managing information and lessons learned so that they remain applicable and usable beyond project closure.? As such, the activity is not included in the GEF budget template as it will be funded through co-financing.

12/08/2021

all required annexes are submitted for the review

Project Results Framework

Secretariat Comment at CEO Endorsement Request

11/11/2021

Yes.

Agency Response

GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request

11/11/2021

Yes.

Agency Response

Council comments

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, please address the following additional issues raised by Germany:

- More detail on the baseline scenario and knowledge management
- Information on the implementation on park guidelines
- Making component 2 focused on biodiversity conservation

Agency Response

12/08/2021

Language to address these comments has been integrated in relevant sections throughout project paper.

STAP comments

Secretariat Comment at CEO Endorsement Request

2/24/2022

Yes.

2/23/2022

No, the question is not answered. What is the tangible support being offered to the Kalinago?

11/11/2021

No, many of the issues have been addressed already; however please respond to the following:

4 - How will the project support small Kalinago enterprises beyond capacity building?

Agency Response

12/08/2021

The project's support extends beyond capacity building by supporting sustainable ecological livelihoods that encourage Kalinago (and others) to engage in conservation enterprises and entrepreneurship whose impact will be sustained through demand from a growing nature-based tourism market.

Convention Secretariat comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Other Agencies comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response

CSOs comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Status of PPG utilization

Secretariat Comment at CEO Endorsement Request

3/3/2022

Yes.

3/2/2022

No, on the Status of Utilization of Project Preparation Grant (PPG): this section in Portal demands *?detailed funding amount of the PPG activities financing status?*. However, there is no detailed financial information (only a lumpsum) per activities as shown in the table below ? please amend.

11/11/2021

Yes.

Agency Response

3/3/22

more details are provided in the PPG table, with the breakdown of costs by the budget items. PPG will be utilized within the next 6 months. some services are under implementation, but not yet being charged yet.

3/2/22

As of February 28, 2022, US\$3,000 of the PPG have been utilized. These have been used to finance the social specialist who has been undertaking consultations with project beneficiaries and finalizing relevant environmental and social risk management instruments (the funding for the environmental specialist is provided through PIU own funds (included in identified co-financing). The values in the PPG table of the datasheet template are adjusted

Project maps and coordinates

Secretariat Comment at CEO Endorsement Request

2/23/2022

Yes.

11/11/2021

No, please note on the map or with coordinates the specific locations where the project will be working.

Agency Response

12/08/2021

description of project-specific sites is included in the GEF online template

Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)

Secretariat Comment at CEO Endorsement Request

NA

Agency Response

Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)

Secretariat Comment at CEO Endorsement Request NA

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is CEO endorsement recommended? (applies only to projects and child projects)

Secretariat Comment at CEO Endorsement Request

3/3/2022

Yes.

3/2/2022

No, please address the issues raised above.

2/24/2022

Yes.

2/23/2022

No, please address the remaining issues which have been discussed before.

1/28/2022

No, please revise based on comments provided.

11/11/2021

No, please revise and resubmit.

Review Dates

| | Secretariat Comment at CEO Endorsement | Response to Secretariat comments |
|---|---|---|
| First Review | 11/11/2021 | |
| Additional Review (as necessary) | 2/23/2022 | |
| Additional Review (as necessary) | 2/24/2022 | |
| Additional Review (as necessary) | 3/2/2022 | |
| Additional Review (as necessary) | 3/3/2022 | |

CEO Recommendation

Brief reasoning for CEO Recommendations