

Policy Coherence for Global Environmental Benefits

Review PIF and Make a recommendation

Basic project information

GEF ID

10920

Countries

Global

Project Name

Policy Coherence for Global Environmental Benefits

Agencies

UNEP

Date received by PM

1/27/2022

Review completed by PM

5/12/2022

Program Manager

Hannah Fairbank

Focal Area

Biodiversity

Project Type

MSP

PIF

Part I ? Project Information

Focal area elements

1. Is the project/program aligned with the relevant GEF focal area elements in Table A, as defined by the GEF 7 Programming Directions?

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

Yes.

Agency Response

Indicative project/program description summary

2. Are the components in Table B and as described in the PIF sound, appropriate, and sufficiently clear to achieve the project/program objectives and the core indicators?

Secretariat Comment at PIF/Work Program Inclusion

May 23, 2022 HF:

Comment cleared

May 18, 2022 HF:

Please include the expected outputs and outcomes related to the component on M&E in Table B.

May 11, 2022 HF:

Comments cleared

April 11, 2022 HF:

1.) Suggest revising the project objective to more specifically target BD GEBs: 'for global biodiversity benefits' or 'global environmental benefits for biodiversity.' This project is supported through BD set-aside and although the policy coherence benefits out

of this project may go beyond biodiversity (carbon neutral etc)-we aren't addressing all GEBs. Please revise.

2.) Please remove indicators at the component level in Table B and include at the Outcome level.

Agency Response

May 18, 2022

Expected outputs and outcome for M&E have been included in Table B.

- 1) The objective was changed to specifically target global biodiversity benefits.
- 2) The indicators were removed at the component level and moved to the Outcome level.

Co-financing

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, with a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized?

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

Yes

Agency Response

GEF Resource Availability

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

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

Yes. This project will be funded out of GEF-7 BD set-aside.

Agency Response

The STAR allocation?

Secretariat Comment at PIF/Work Program Inclusion NA

Agency Response

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

Yes. This project will be funded out of GEF-7 BD set-aside.

Agency Response

The LDCF under the principle of equitable access?

Secretariat Comment at PIF/Work Program Inclusion NA

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion NA

Agency Response

Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

Yes. This project will be funded out of GEF-7 BD set-aside.

Agency Response

Impact Program Incentive?

Secretariat Comment at PIF/Work Program Inclusion NA

Agency Response

Project Preparation Grant

5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

Yes.

Agency Response

Core indicators

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

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

Yes. Given the scope of the project only Core Indicator 11 was selected.

Agency Response Response: A note in the Core Indicator section was added to explain why there are no values for the main GEF Core Indicators. The note states: The only applicable indicator for a project on Policy Coherence is No. 11. No other indicator captures the objective of the project of making policy and political decisions consistent across sectors and in support of Biodiversity conservation. This project is basically about capacity building among policy makers that are the beneficiaries of the project.

Project/Program taxonomy

7. Is the project/program properly tagged with the appropriate keywords as requested in Table G?

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

Yes.

Agency Response

Part II ? Project Justification

1. Has the project/program described the global environmental/adaptation problems, including the root causes and barriers that need to be addressed?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

All comments cleared.

April 11, 2022 HF:

1.) Paragraph 2 states the "long term solution" that includes "spatial and land-use planning" which is part of the answer but should further elaborate **to what end** since spatial and land-use planning on its own won't necessarily be sustainable. Spatial and land-use plans can result in biodiversity loss and high GHG emissions if not done with a motivation to conserve, protect and sustainably use natural capital and biodiversity. This paragraph/sentence should further clarify/elaborate that we are talking about 'spatial and land-use plans for "nature positive land/resources use."

2.) Paragraph 3 discusses the impacts of policy incoherence and benefit of policy coherence. Would suggest including the point that policy incoherence not only degrades the environment which works against meeting commitments under MEAs, but in addition, policy incoherence widens the financing gap. And conversely, by addressing policy incoherence there is the potential to decrease the financing gap to meeting MEA commitments and achieving a nature positive/carbon neutral future...Suggest revising to make finance gap point.

3.) Paragraph 5 (that starts with "implementing the objectives") includes a sentence on gender that doesn't seem to fit well "The project will actively promote affirmative action throughout the different activities in pursuit of gender equality." Gender issues should certainly be integrated throughout the project concept/design, please revise this para, and the concept accordingly (also based on the gender section).

Agency Response

1) The respective paragraph has been edited accordingly as follows: The long-term solution? A legal framework that allows the development and implementation (with proper enforcement) of spatial and land-use planning with the core objective of mainstreaming biodiversity measures in the productive sectors. This practice allows the allocation of lands for the activities of the productive sector (including intensifying beef production and agricultural outputs) with the objective of conserving biodiversity and sustainably use natural capital. In other words, land use planning must ensure that biodiversity is not undermined or degraded while carrying out productive activities.

Furthermore, land use planning must ensure nature positive resources use. Having an adequate legal framework for land-use planning is a condition sine qua non for long-term investment in sustainable agriculture and beef production. Environmental degradation could be mitigated by means of enacting or amending the legal frameworks associated with destructive practices and by providing incentives for biodiversity-positive land and resource use that remains productive while enhancing biodiversity conservation.

2) The following paragraph was added: Policy coherence can play a key role in narrowing the gap for nature and biodiversity conservation in particular. Policy frameworks that are consistent with biodiversity conservation would facilitate increasing nature-related funding to narrow the gap. In contrast, policy incoherence is likely to widen the financial gap, as commonly accepted when perverse domestic incentives are in place. As stated by the GEF in the GEF-8 replenishment, closing the financial gap requires a two-pronged approach: increasing financial flows, and reducing financial needs. All in all, it is a condition sine qua non for a regulatory and policy environment at the national scale to discourage/eliminate harmful practices and encourage large-scale finance for nature.

3) The paragraph in reference has been edited as follows: The implementation of activities in a coordinated manner and aiming at delivering sustainable and durable results will require that gender issues are looked at in detail to ensure proper participation of men and women in pursuit of gender equality.

2. Is the baseline scenario or any associated baseline projects appropriately described?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:
Comment cleared.

April 11, 2022 HF:

1.) Please provide a bit more reasoning for why, given the nature of the project, countries will be selected during PPG or beyond.

Agency Response

1) The following paragraph was added: ?This will be a Global project with 3 participating countries. Given the nature of the project it is not possible to identify the countries and secure the LOEs at this stage. It is not possible to preselect the countries because there are a number of political considerations that need to be taken into account, that would change with the election of a new legislature. CCN needs to work with the congressmen and parliamentarians that are in office during the PPG in order to determine if there is political will to address policy incoherence even though this may result in adverse short term financial and economic consequences, and whether or not there are good working relationships between the Legislative and the Executive since new laws and amending existing legislation resulting from the project would need to be absorbed by the executive in their implementation plans.?

3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

All comments cleared.

April 11, 2022 HF:

- 1.) Please describe the alternative scenario proposed under this project.
- 2.) Component 1: Please include reference to GEBs for biodiversity so that the work under Component 1 focuses on policy coherence for nature positive development (or such).

Component 2:

- 3.) Please describe how, for each target country, the focus of the analysis and action under Component 2 will be identified (e.g. either by sector (ex. fisheries, extractives, agriculture etc) or by BD outcome sought. This will help to understand how the work under Component 2 will be focused.

- 4.) Output 2.1.2: correct "across purposes" to "at cross purposes".

- 5.) Output 2.1.3: This is a key place where the potential impact of this MSP sits. Please further describe what can be expected here in terms of policy reform and alignment of financial resources, and how this project will support achievement of Policy Coherence in each target country (understanding this will be further developed in PPG).

Component 3:

- 6.) Output 3.1.3: Given the maintenance and sustainability issues involved with establishing a new website, we would recommend considering alternative means for disseminating and sharing information regarding policy coherence. Are there other platforms that could host the material and lessons learned? This could both strengthen partnerships and address sustainability/duplication concerns. Please explore alternative options. Could do so in PPG with a placeholder in the PIF for ideas/means of dissemination if those possibilities have not yet been identified. Overall though, we would strongly encourage an alternative approach to establishing a new website for this purpose at this time.

Agency Response

1) The section has been edited to better describe the alternative scenario of the project. Followed by elaboration on individual components, it is prefaced by the following paragraph: "The alternative scenario of this project calls for the identification of the policy incoherence that hinder the delivery of global biodiversity benefits and the amendment of the legal framework with new laws and regulations to overcome these difficulties and facilitate the delivery of positive biodiversity actions on the ground that are durable and tangible."

2) Component 1 has been edited to highlight nature positive development and biodiversity benefits.

3) Component 2 has been edited as suggested. The following text was added: Because the target countries are likely to vary in their main economic activities, the productive sectors that will be reviewed and analysed will vary from country to country. In countries where there is significant forest cover, sectors like forestry, the development of linear infrastructure and energy (oil & gas) are likely to be selected as priorities for the analysis on the impact on biodiversity conservation and in-coherences with the laws and regulation that govern the conservation and sustainable use of biological resources. In countries that depend on cattle ranching and agribusiness, these two sectors will be reviewed and analysed first in search for the in-coherences in policies, laws and regulations with BD conservation.

4) Output 2.1.2 was edited as suggested.

5) The following was added to improve the description in reference: As a result of this exercise, the project expects the policy makers to retire old legislation, draft new laws and amend existing legislation to address the in-coherence identified in the analysis. In addition, the Legislators and/or the Executive (depending on what branch of government is in charge of the Central Government's budgeting process), would be expected to work with the appropriate committees to reduce or eliminate perverse financial incentives to the productive sectors that are negatively affecting biodiversity conservation, and increase the budget allocations to the activities related to conservation and sustainable use. The combination of these two actions, should result in narrowing the funding gap for nature. How far this process is likely to go, will be determined during PPG.

6) Regarding dissemination, the following edits were made: Output 3.1.3 Develop and sustain a "Community of Practice" on Policy Coherence. Different platforms and means will be explored during PPG. In addition, the following was included under 8. *Knowledge Management*: "CCN will explore means to develop and sustain a "Community of Practice" on Policy Coherence. This is a theme that is at the heart of ICCF's mission of "advancing governments' leadership in conservation internationally by building political will within legislatures". CCN could start by uploading on its own web site updates on the activities of the project, brochures, newsletters, and any relevant publications that were of value during the execution of the project. If successful, this may become "the place to go" to learn, comment and share lessons on PC cases in at least the participating countries.

4. Is the project/program aligned with focal area and/or Impact Program strategies?

Secretariat Comment at PIF/Work Program Inclusion

April 11, 2022 HF:

1.) Please provide examples to illustrate the first point in section 4 as it isn't totally clear.

Agency Response

To further clarify, the following text was added: For instance, on projects of mainstreaming biodiversity measures in the agricultural and cattle ranching sectors, there are not only practices that can ameliorate the impact of the industries on biodiversity conservation (that need to be implemented) but there are associated legal frameworks that need to be reviewed to make conservation sustainable in the long term. One thing is to put a short-term remedy to biodiversity degradation by means of implementing better practices, certification schemes, payment for environmental services, and biodiversity offsets, yet another to address compounding factors that facilitate degradation of natural resources like financial subsidies.

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

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

Comment cleared.

April 11, 2022 HF:

1.) In section 5 of the portal MSP, please directly address/describe the **"Incremental/additional cost reasoning" for this project**. The current text seems to describe sources of background information for analysis for the project.

Agency Response

1) The text in this section has been edited to better explain the incrementality concept in this project.

6. Are the project?/program?s indicative targeted contributions to global environmental benefits (measured through core indicators) reasonable and achievable? Or for adaptation benefits?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

Comments cleared.

April 12, 2022 HF:

1.) Please revise section six in relationship to supporting countries to meet their commitments under the relevant BD MEA (CBD-GBF).

2.) Suggest that you build on the passage "leading to the drafting of coherent legal frameworks for the planning and delivery of GEBs" in this section, as well in the description of Outcome 2 of the project.

Agency Response

1) The following text has been added to improve clarity: During the PPG phase, this project will engage with the agencies charged with the implementation of the National Biodiversity Strategy Action Plan NBSAP (<https://www.cbd.int/nbsap/>), to review the priorities of the National Governments in order to fulfil their commitments under the CBD and other international agreements. These agencies will be an important source of information on the policies, laws and regulations that may be hindering their efforts to deliver the priority GEBs.

2) As stated before, the project expects the policy makers to retire old legislation, draft new laws and amend existing legislation to address the in-coherence identified in the analysis, and work with the Executive to reduce or eliminate perverse financial incentives to the productive sectors that are negatively affecting biodiversity conservation, and increase the budget allocations to the activities related to conservation and sustainable use.

7. Is there potential for innovation, sustainability and scaling up in this project?

Secretariat Comment at PIF/Work Program Inclusion

April 12, 2022 HF:

Yes.

Agency Response

Project/Program Map and Coordinates

Is there a preliminary geo-reference to the project's/program's intended location?

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

Stakeholders

Does the PIF/PFD include indicative information on Stakeholders engagement to date? If not, is the justification provided appropriate? Does the PIF/PFD include information about the proposed means of future engagement?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

Comments cleared.

April 12, 2022 HF:

- 1.) Please describe the stakeholder engagement to date-(would imagine that this would include conversations at the Costa Rica meeting as well as with caucuses thus far?)
- 2.) Please describe how stakeholders will be engaged in the project preparation, their respective roles and means of engagement.

Agency Response

- 1) Descriptive text on stakeholder engagement to date has been included in the PIF.
- 2) Descriptive text on stakeholder engagement in project preparation has been included in the PIF.

Gender Equality and Women's Empowerment

Is the articulation of gender context and indicative information on the importance and need to promote gender equality and the empowerment of women, adequate?

Secretariat Comment at PIF/Work Program Inclusion

May 18, 2022 HF:

Comment cleared.

May 11, 2022 HF:

Comment cleared.

April 12, 2022 HF:

Please describe any plans to address gender in the project design (including through a gender analysis to inform project planning).

Agency Response

To further clarify, the following text has been added: A Gender Analysis will be carried out in the participating countries to systematically collect information about gender roles and relationships in natural resource management and how to better balance the responsibilities of males and females in decision making and ultimately in determining the outcomes of projects where biodiversity conservation is the guiding principle.

Private Sector Engagement

Is the case made for private sector engagement consistent with the proposed approach?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

Comment cleared.

April 12, 2022 HF:

Please further describe private sector engagement that is envisioned, potentially including engaging firms or industries that have already made sustainability commitments, and/or through engagement of the private sector in a multi-stakeholder approach to improving legislative policy coherence etc.

Agency Response

The following text was added to improve this section: The project will organize briefings and round tables with the main private sector companies associated with the different productive sectors in the target countries to explain the objective of the project and to illustrate how their supply chains may be affected in the long run due to environmental degradation. If private sector companies see that the sustainability of the supply chains will be affected by environmental degradation, they will most likely take an active role in the project and work with their counterparts in the Legislature. Private sector companies in ICCF Conservation Council will be invited as resource institutions to discuss how they are benefiting from the propositions of ICCF.

<https://www.internationalconservation.org/partners>

Risks to Achieving Project Objectives

Does the project/program consider potential major risks, including the consequences of climate change, that might prevent the project objectives from being achieved or may be resulting from project/program implementation, and propose measures that address these risks to be further developed during the project design?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

Comment cleared.

April 12, 2022 HF:

Please provide a rating for the risks included in the table.

Agency Response

Risk ratings were provided in the risk table.

Coordination

Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined? Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

Comment cleared.

April 12, 2022 HF:

Recommend including the other UNEP/CCN project recently approved on PA sustainable financing-and describe areas for potential coordination/complementarity and avoiding overlap (e.g. with conservation caucuses etc).

Agency Response Pertinent text has been included as suggested.

Consistency with National Priorities

Has the project/program cited alignment with any of the recipient country's national strategies and plans or reports and assessments under relevant conventions?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

Comment cleared.

April 12, 2022 HF:

Yes-intended to do so.

Agency Response

During PPG, the alignment of the project with the participating national strategies and plans or reports and assessments under relevant conventions will be presented.

Knowledge Management

Is the proposed ?knowledge management (KM) approach? in line with GEF requirements to foster learning and sharing from relevant projects/programs, initiatives and evaluations; and contribute to the project?s/program?s overall impact and sustainability?

Secretariat Comment at PIF/Work Program Inclusion

May 18, 2022 HF:

Please revise the phrase: "A) the use of male and female knowledge products" to "gender-sensitive or gender-responsive knowledge products; and, with regard to the reference to "as well as male and female reviewers", it is suggested to refer to "reviewers with gender expertise."

May 11, 2022 HF:

Comment cleared.

April 12, 2022 HF:

Please see previous note regarding establishment of a website as this may also apply to how the proposed "community of practice" is approached.

Agency Response

May 18, 2022

The text in reference has been revised as recommended.

The following text was added under KM: CCN will explore means to develop and sustain a ?Community of Practice? on Policy Coherence. This is a theme that is at the heart of ICCF mission of *?advancing governments' leadership in conservation internationally by building political will within legislatures?.* CCN could start by uploading on its own web site updates on the activities of the project, brochures, newsletters, and any relevant publications that were of value during the execution of the project. If successful, this may become ?the place to go? to learn, comment and shared lessons on PC cases in at least the participating countries.

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 PIF/Work Program Inclusion

May 11, 2022 HF:
Comment cleared.

April 12, 2022 HF:

1.) Section 9 does not include text on ESS, instead it seems to include introductory language for the project. Please revise to address the ESS requirements/questions for this section.

Agency Response

Environmental and Social Safeguards requirements are being followed as per UNEP's standards which are fully compliant with GEF requirements. This process/format will be carried forward throughout the development and implementation phases of the project.

The ESS analysis was initiated using UNEP standard format/checklist (Safeguard Risk Identification Form -SRIF) with a specialized review (including signature of conformity) by UNEP's ESS Focal Point during UNEP's Concept Review Committee (CRC) assessment of the PIF. This review reached the following preliminary conclusion: *This is a low risk project. However, guiding principles (GP questions 1-10 in the Section 3) should be respected throughout the project life cycle. Also, as it aims to analyse and assist Policy Coherence and Political Consistency across policy, laws, regulations, programs, plans, norms and directives, please consider carrying out the strategic environmental assessments (SEAs) incorporating key actors, barriers, opportunities, strengths, and threats from wide contexts (e.g., population and economic trends, private sector engagement, local livelihood issues, political context, environmental and climate adaptation challenges, etc.) in the process of addressing any inconsistencies of policies and regulations.*

Please refer to the attached SRIF format for further detail including comprehensive ESS analysis questionnaire and checklist.

The above text has been included in Section 9 for ease of reference to the SRIF Form attached which contains all the necessary details on ESS.

Part III ? Country Endorsements

Has the project/program been endorsed by the country's GEF Operational Focal Point and has the name and position been checked against the GEF data base?

Secretariat Comment at PIF/Work Program Inclusion

April 12, 2022 HF:

1.) Given the nature of the project, and the need for a high-degree of political will, target countries expect to be identified early in implementation phase (if not during project design). Given this, please provide letters of endorsement from the OPFs for target countries prior to undertaking any in-country project activities.

Agency Response

Letters of Endorsement will be provided prior to undertaking any in-country project activities.

Termsheet, reflow table and agency capacity in NGI Projects

Does the project provide sufficient detail in Annex A (indicative termsheet) 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 in Annex B to assess the project capacity of generating reflows? If not, please provide comments. After reading the questionnaire in Annex C, is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is the PIF/PFD recommended for technical clearance? Is the PPG (if requested) being recommended for clearance?

Secretariat Comment at PIF/Work Program Inclusion

May 23, 2022 HF:

Yes. Agency has addressed PPO's comment by including expected outputs and outcome for M&E in Table B as requested.

May 18, 2022 HF:

Please address remaining comments in highlights.

May 11, 2022 HF:

Yes, PIF is recommended for technical clearance. Please note that given the nature of the project, and the need for a high-degree of political will, target countries expect to be identified early in implementation phase (if not during project design). As such, UNEP as the GEF IA will provide letters of endorsement from the OPFs for target countries prior to undertaking any in-country project activities.

April 12, 2022 HF:

No, not at this time. Please address comments in the review sheet, revise the concept and resubmit.

ADDITIONAL COMMENTS

Additional recommendations to be considered by Agency at the time of CEO endorsement/approval.

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2022 HF:

During PPG and design of country-activities, please, to the extent possible, focus on legislative measures with both nature positive AND carbon neutral results.

Review Dates

	PIF Review	Agency Response
First Review	4/11/2022	
Additional Review (as necessary)	5/11/2022	
Additional Review (as necessary)	5/18/2022	
Additional Review (as necessary)	5/23/2022	
Additional Review (as necessary)		

PIF Recommendation to CEO

Brief reasoning for recommendations to CEO for PIF Approval