

# Conserving terrestrial and marine biodiversity and restoring ecosystem services in globally relevant and vulnerable sites in Somalia

Review CEO Endorsement and Make a recommendation

## Basic project information

<b>GEF ID</b>	11414
<b>Countries</b>	Somalia
<b>Project Name</b>	Conserving terrestrial and marine biodiversity and restoring ecosystem services in globally relevant and vulnerable sites in Somalia
<b>Agencies</b>	UNDP
<b>Date received by PM</b>	6/16/2025
<b>Review completed by PM</b>	7/2/2025
<b>Program Manager</b>	Remy Ruat
<b>Focal Area</b>	Multi Focal Area
<b>Project Type</b>	FSP

**PIF  
CEO**

**Part I - General Project Information**

**1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (8/1/2025):

1. Cleared

RR (7/2/2025):

1. Please see comments in the execution arrangements section.

Agency Response

31 July 2025

The detailed information is provided in the execution arrangements section.

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

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

**2. Project Summary.**

**a) 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 outcomes?**

**b) Does the summary capture the essence of the project and is it within the max. of 250 words?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (8/1/2025):

1. Cleared

2. Cleared

RR (7/2/2025):

1. The summary of the drivers of degradation only retains exogenous factors (climate, drought) and conflict and does not mention the anthropogenic drivers noted in the rationale (such as agriculture and irrigation related issues and drivers affecting seascapes such as IUU) > could you please reflect the main ones in the summary?
2. Please see comments in project description and reflect in the summary as adequate.

## Agency Response

31 July 2025

1. The project summary has been revised to reflect both exogenous and anthropogenic drivers of degradation. In addition to climate-induced stressors such as prolonged droughts, floods, and increasing temperatures, exacerbated by climate change and conflict, the summary now includes key anthropogenic drivers. These include unsustainable agricultural expansion, overgrazing, poor irrigation practices, deforestation for charcoal production, and illegal, unreported, and unregulated (IUU) fishing in marine ecosystems. These human-induced pressures are particularly acute in ecologically sensitive areas such as the Jubba and Shabelle river basins and Somalia's extensive coastline. The revised summary also highlights the cumulative impact of these drivers on biodiversity loss, ecosystem fragmentation, and the degradation of both terrestrial and marine ecosystem services. These updates are aligned with the findings and priorities outlined in Somalia's NDC 3.0 (2025), National Adaptation Plan (NAP 3.0), and the Advancing Early Warnings for All (EW4ALL) proposal, and have been incorporated into the CEO Endorsement Request page 5 and UNDP ProDoc page 8-9.
2. The detailed information is provided in the project description and is adequately reflected in the summary.

### 3. Project Description Overview

- a) Is the project objective statement concise, clear and measurable?
- 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?
- c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
- d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
- e) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (8/1/2025):

1. Cleared
2. Cleared
3. Cleared

RR (7/2/2025):

Objective is clear. KM, gender and M&E included and budgetted. PMC contributions proportional and under 5%.

1. Output 4.1.3 on environmental safeguards management has no place in the M&E component, as this should be mainstreamed throughout project components per GEF policy and guidelines on ESS. Of course reporting on these issues should be part of the MTR and TE work, but this is already included in the related budgets and does not warrant a dedicated subcomponent. Please remove and allocate these costs throughout project components for implementation by the execution partner.
2. Similarly Output 4.1.1 is knowledge management related, not part of the M&E budget, and should be included with similar activities such as under output 1.2 (activity 1.2.2 is similar), in the absence of a project component focusing more broadly on KM issues.
3. Please see comments on project description and core indicators and reflect in logical framework as needed.

## Agency Response

31 July 2025

1. Output 4.1.3 on environmental safeguards management has been removed from the M&E component. In alignment with GEF policy and guidelines on Environmental and Social Safeguards (ESS), the associated activities and costs have been redistributed across the relevant project components where safeguard implementation is operationalized. Reporting on ESS compliance will continue to be integrated into the Mid-Term Review (MTR) and Terminal Evaluation (TE), as per standard practice, and is already accounted for in the respective evaluation budgets. These changes have been reflected in the CEO Endorsement Request pages 10 and UNDP ProDoc, page 13.
2. Output 4.1.1, which pertains to knowledge management (KM), has been relocated from the M&E component to Output 1.2.2, where similar KM activities are already planned. This adjustment ensures thematic coherence and avoids duplication of budget lines. The revised structure now consolidates KM efforts under a single output, enhancing clarity and alignment with GEF guidance. The CEO ER page 7-10 and UNDP ProDoc Page 14, 19, 20 have been updated accordingly. Budget Amounts have been moved to Output 1.2.
3. The logical framework has been revised to reflect the updated project description, and core indicators have also been revised. Changes have also been made the project results framework to reflect the changes in the core indicators. These are included in the CEO ER (pages 6-10, 79 -98).

### 4. Project Outline

#### A. Project Rationale

- a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?
- b) Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?
- c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (11/4/2025):

1 and 2. Cleared. Thank you for the useful additions, it is clear now.

4. Thank you for the added table, very helpful. Cleared

5. Cleared

RR (8/1/2025):

1. Thank you for the helpful revisions, however the text still repeats what is missing, without clarifying what the current efforts would be able to achieve without the project. The rationale now clarifies sufficiently what the baseline efforts are at the initial stage (e.g. today), but not how they are expected to evolve in the future and the results expected from them, which would then help us understand why there are missing elements which could then be covered by the project. Thank you for adding this missing link.

Could you please also clarify why the absence of a legal framework for protected areas is problematic? This joins again the initial question about what would happen without the project. Why is an informal system less adequate for the Somalia context than a legally recognized protected area system? Is the anticipation that a legal and formal backing to new PAs will lead to the government allocating more funds to support staffing and enforcement for example - which may perhaps not be happening with the current approach?

It would be useful also to describe what these informal areas do today, as for now there is only a sentence saying that they are not adequate, but nothing clarifying what is the experience of the country (and of UNDP in the country) in area based management of biodiversity, which is one of the most important information we would expect from a situation analysis on this topic. The project description for example describes some protected areas that are in place since the 1950s (such as Laag Badana National Park) yet in other places claims that there are no protected areas in the country. When looking at the WDPA database, the following PAs seem to pre-exist according to a reporting made in 2018: (i) Hoby (WDPA ID : 555629379), (ii) Sacadin Zayla (555629384), (iii) Haradere (555629369), (iv) Jawhar (555629370), (v) Laag badane (555629371), (vi) Daalo Mountain Forest (555629377) - the WDPA database also notes areas close to some other prospective PAs from the project list (Taleh el-chebet close to Dhahar). Further, the availability of preliminary METT scores screenings for all 11 locations tends to point to pre-existing protected area management activities. This is therefore all quite confusing and some clarity on the initial state of play would be welcome. From our perspective it does not make a large difference if some of the protected areas to be supported pre-existed in a less formal shape - simply then it would be better not to claim that we are starting from scratch, and to use the right description for these (this will also help to clarify which core indicator to use). Thank you for clarifying and ensuring consistency throughout project document.

2. The rationale now briefly lists and describes the 2023 National Environmental Policy and the 2024 Environmental Protection and Management Act. Could you please describe the main features of these two policy/act in slightly more details- at CEO ER stage, we would need to understand what these policies/strategies cover and main approach to reach intended targets, to better understand how the project can add value to help the government reach its objectives. Could you please consider the follow up comment above in addressing this.

3. Cleared.

4. A short description is provided for each of the 11 sites, which is helpful. One element that is missing from the provided descriptions which would be important to clarify for eligibility purposes is the global significance of the biodiversity that is present in the sites identified for prospective protected area establishment. There are several ways to do this, by describing the situation in these 11 sites in regards of the global situation: for example, hotspot of BD, KBA, Global 200, Endemic Bird area, Endemic plant area, Ramsar sites, IBAs... along with a brief

description of types of biomes/ecosystems and emblematic species and landscapes to be found in these areas.

5. Some information is provided about anticipated services to be covered and legal bottlenecks to be addressed. However no information is provided about anticipated service providers and prospective buyers. Thank you for adding this information. Thank you for also providing a detailed description of what the scope is of the UNDP BIOFIN work in the country, as this component currently appears to be redundant with it, and it would not be the purpose of GEF project level funding to act as a simple top-up. In order for us to better understand the additionality of this intervention, we would need to understand what the current status of the BIOFIN work in the country is, and how the project can best focus on the most operational applications specific to its scope.

RR (7/2/2025):

1. The baseline scenario would need some strengthening. Currently the section on what would happen without the project limits itself to noting what the project proposes to do and explains that it would not happen without it, which is a bit self-explanatory. Could you please clarify what would happen without the project using positive sentences, in the sense of clarifying what will happen without the project. In other words, clarifying what other initiatives are in place in the country (including by government), what past and ongoing experiences the project would build on (and this would be different from the lessons learned noted further below which are about the project's management/design approach - here we are more interested about the additionality of this new intervention, its incremental nature compared to existing efforts). For example it is mentioned that UNDP has experience in protected area management in the country, but then also noted that the country lacks formally recognized protected area systems - which seems contradictory as it would seem there have been some experiences in the country (as reported also in the country dossier for aichi target 11 which notes 21 informal protected sites reported to date already), and yet the project seems to fuel the notion that it is the first to address this issue. It would be helpful to better clarify what are the current efforts and progress in place, what progress might be expected without the project, and on this basis clarify why these are not sufficient and what are the gaps that remain to be filled. On this basis it will be easier to understand the added value of this project. It would also help in that regard if this part of the rationale could be moved to after the description of systemic barriers and enablers and most importantly just after the description of the landscape of investments, which it should complement

2. The alignment with country priorities segment should also be revised to better clarify what the listed policies/strategies cover and their limitations which help justify the project. This can also be weaved into the revised description recommended above.

3. Please also see the enclosed STAP comment at PIF stage, which does not seem to have been addressed as this information is missing from the scenario description : "Although a substantial description is provided of the effects of conflict and weak governance, the proposal does not consider measures for ensuring the outcomes will remain resilient to future trends involving conflict. The same applies to climate change, as Somalia is already being impacted by droughts and floods. Developing simple narratives of plausible futures, to better understand how future trends could impact outcomes, is a necessity to develop robust interventions. A revised project rationale and description will need to account for this future planning."

4. A description of the targetted landscapes where prospective protected areas are planned by the project is missing. This also echoes one of the STAP comments made at PIF stage, copied enclosed : "For example, component 2 lists several activities that will be pursued to strengthen protected area management without describing, even minimally, the socioecological characteristics of the eleven proposed protected areas. Component 3 is better articulated, however, as it proposes to conduct an assessment of degradation before deciding on the interventions." Thank you for elaborating, based on data available, even if minimal, to address this STAP comment.

5. As output 1.1.4 looks at developing a financial strategy for the protected area system, a corresponding baseline assessment is missing regarding envisaged sources to be explored. In particular for PES, it would be useful to clarify what is the preliminary understanding of what services would be covered (e.g. water management, ecotourism), who the service providers would be, who the buyers would be, and whether the current institutional/legal structure allows for such mechanism to be put in place or whether reforms would be needed to achieve that. Clarifying baseline elements in connection with this output (also in regard to government sources, donor sources, etc) is important for the long term sustainability of this project.

## Agency Response

6 Oct 2025

1. Thank you for the comment. We have further refined the rationale to clearly distinguish between what the baseline efforts are expected to deliver in the future and what gaps remain that justify GEF intervention. Somalia has adopted the 2023 National Environmental Policy and the 2024 Environmental Protection and Management Act, but these remain at a framework level. Without the project, the government may continue implementing general provisions, yet PA-specific regulations, gazettelement procedures, and institutional capacity are unlikely to materialize soon. Informal conservation efforts may persist but will not deliver a legally recognized PA network or attract sustainable financing. This means biodiversity loss, land degradation, and governance gaps would continue. The clarification has been incorporated under the Weak Governance and Legal Fragmentation sub-title at page 16 of the CEO ER and page 20 of the UNDP Prodoc.

We have expanded the explanation to clarify why the absence of a legal framework for protected areas poses a significant barrier in Somalia, and why informal arrangements are insufficient in this context. The absence of a legal framework is problematic because it results in weak enforcement, unclear mandates, limited funding, and low investor confidence in ecotourism and value-added processing for NWFPs. In Somalia's fragile governance context, informal systems are particularly vulnerable to political and resource pressures. Legal recognition is expected to trigger budget allocations, enable recruitment of rangers, and facilitate partnerships with donors and private actors. Establishing a formal PA system is therefore essential to secure government commitment, ensure enforceability, and integrate biodiversity conservation into national development and climate strategies. Additional details are provided in the CEO ER (pages 15-18) and UNDP Prodoc (pages 19-21).

Thank you for highlighting the need for greater clarity regarding Somalia's pre-existing protected areas and informal conservation practices. We have revised the project documentation to ensure consistency and to provide a more accurate description of the current baseline. Somalia does indeed have several areas historically designated as protected (e.g., Laag Badana National Park from the 1950s, and additional sites listed in the WDPA database such as Hoby, Sacadin Zayla, Haradere, Jawhar, and Daalo Mountain Forest). However, these designations have never been fully formalized through national legislation, gazettelement, or functional management structures. As a result, these areas currently operate as informal or partially recognized sites, with little to no government funding, enforcement or systematic management. Conservation activities that exist today are largely community-driven, donor-supported or ad hoc in nature. To avoid confusion, we have streamlined and consolidated the information on the proposed 11 PAs into a dedicated Project Area section in the CEO Endorsement Request from page 49 to 57. The same approach has been applied in the UNDP Prodoc, where details are presented in Annex 3 (pages 156-165). This ensures consistency across the documents, avoids redundancy, and provides a clear baseline of what exists today, how these areas are currently managed, and why GEF support is needed to transform them into a legally recognized and sustainably managed PA system.

2. Thank you for this useful suggestion. The 2023 National Environmental Policy (NEP) sets strategic directions for biodiversity conservation, climate resilience, and sustainable development,

emphasizing principles such as precautionary action and polluter-pays. The 2024 Environmental Protection and Management Act (EPMA) provides legal authority for environmental protection, including ESIA requirements, pollution control, and biodiversity conservation, and establishes an Environmental Trust Fund and a National Environmental Council. However, the EPMA lacks secondary regulations and operational guidelines for PA designation and management. The project will fill this gap by developing PA-specific regulations, institutional arrangements, and financing mechanisms, thereby operationalizing the intent of these policies. Additional details are provided in the CEO ER (pages 12-13) and the Prodoc (pages 10-11).

4. Thank you for highlighting the importance of clearly describing the global biodiversity significance of the proposed sites. The CEO ER (pages 57-60) provides details on the global value of the 11 proposed sites. For each, we describe its alignment with international biodiversity classifications and designations, including whether the site overlaps with biodiversity hotspots, Key Biodiversity Areas (KBAs), Global 200 ecoregions, Important Bird and Biodiversity Areas (IBAs), endemic species ranges, or Ramsar-listed wetlands. The section also includes a summary of the biomes and ecosystems represented and landscapes that underscore the global conservation importance of these areas.

5. Service providers will include the Ministry of Environment and Climate Change, Federal Government of Somalia and Federal Member States (FMSs) authorities for PA governance, private ecotourism operators, and community-based organizations. Buyers will include tourists, private companies seeking biodiversity offsets, and development partners. BIOFIN in Somalia is currently at the diagnostic stage, focusing on Institutional capacity, expenditure reviews and finance needs assessments. It does not implement site-level finance solutions. The proposed GEF Biodiversity project will complement BIOFIN by piloting operational mechanisms such as trust fund capitalization, payment for Ecosystem services (PES) schemes, and tourism concessions linked to legally recognized PAs, ensuring clear additionality. This has been included in the CEO ER (page 22) and in the UNDP Prodoc (page 53).

31 July 2025

1. The baseline scenario has been revised to clearly articulate what would happen in the absence of the proposed project. Without the project, Somalia's biodiversity and ecosystem services would continue to degrade due to the cumulative impacts of climate change, unsustainable land use, and weak institutional capacity. Although there are ongoing efforts by the Federal Government of Somalia, Federal Member States, and development partners, including the Ministry of Environment and Climate Change, FAO's SWALIM, UNDP's previous work on protected area management, and the EU-funded BRICiS program, these initiatives remain fragmented, underfunded, and lack a cohesive national framework for biodiversity conservation. The proposed project builds on these efforts by formalizing and scaling up the management of 11 protected areas, integrating terrestrial and marine ecosystems, and embedding biodiversity conservation into national and sub-national planning. It also leverages Somalia's 2020 Land Degradation Neutrality Target Setting Programme and aligns with the country's updated climate commitments under NDC 3.0 and NAP 3.0. The revised rationale now follows the description of systemic barriers and the landscape of investments to better demonstrate the project's additionality and incremental value. In parallel, Somalia is implementing several major initiatives with support from international partners. These updates are consistent with the feedback provided and are now reflected in the CEO ER page 18 and UNDP ProDoc pages 9-16.
2. The alignment with the country priorities section has been revised to provide a clearer explanation of the scope and limitations of key national policies and strategies. These include Somalia's National Biodiversity Strategy and Action Plan (NBSAP, 2015-2025), the National Adaptation Plan (NAP 3.0, 2022), the Nationally Determined Contribution (NDC 3.0, 2025), and the National Environmental Policy, (2023). While these frameworks articulate strong commitments to biodiversity conservation and climate resilience, they face implementation challenges due to limited technical capacity, weak enforcement mechanisms,

and fragmented institutional mandates. The proposed project addresses these gaps by operationalizing these strategies through concrete, on-the-ground interventions in protected area management, ecosystem restoration, and integrated land use planning. The project also supports the development of enabling policies and institutional frameworks, thereby enhancing the coherence and effectiveness of national environmental governance. These revisions have been integrated into the updated project rationale in the CEO ER page 19 and UNDP ProDoc pages 22-23.

3. The project rationale and component descriptions have been updated to incorporate resilience thinking and future scenario planning, as recommended by STAP. This is updated in the CEO ER on page 11-12 and in the UNDP Prodoc pages 13-15.
4. Descriptions of the targeted landscapes have been provided in the CEO ER on page 46 and in the UNDP Prodoc on page 148.
5. The financial strategy under Output 1.1.4 will be coordinated closely with the GEF-funded Biofin project to ensure alignment on biodiversity financing strategies. This will involve sharing data from baseline assessments, aligning legal and policy recommendations, and identifying sustainable financing options such as PES, carbon credits, and ecotourism. Capacity-building efforts will also be harmonized to strengthen financial management systems and promote long-term sustainability of protected areas. In addition, this output has been revised to include a baseline assessment of potential financing mechanisms for the protected area (PA) system. This includes an initial mapping of ecosystem services with market or quasi-market potential, such as: ecotourism, watershed services and carbon credits. The baseline also identifies institutional and legal gaps, such as the absence of a national PES policy and limited capacity for valuation and contract enforcement. The project will support enabling reforms, including guidelines for benefit-sharing and legal recognition of community conservation areas. Government budget allocations, donor contributions (e.g., EU, FAO), and diaspora philanthropy are also considered in the financing mix. These elements are now reflected in the revised Output 1.1.4 narrative on page 28 in the CEO ER and page 28 of the UNDP Prodoc.

## **5 B. Project Description**

**5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?**

**b) 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?**

**c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?**

**d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?**

**e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?**

**f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?**

**g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?**

**h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?**

**i) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?**

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

**k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?**

**l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (11/4/2025):

2. Cleared

3. Comments are still apparent on the title but this is ok

5. Thank you for the details - cleared

6. Cleared - together with updated rationale this provides a comprehensive picture.

RR (8/1/2025):

1. Cleared

2. Please also include in the annex responses to PIF stage comments provided by council members (comments shared by Canada, Germany, US).

3. Thank you - it seems some internal agency comments were left by mistake on the project document > see title of figure 1 mentioning these changes.

4. Cleared.

5. Thank you for the details. While the description for some areas clarifies how activities are expected to be adequate to address drivers of degradation of targetted landscapes and key gaps/bottlenecks for success SLM and restoration activities, this is not the case for all areas.

Descriptions that show a clear logical explanation of the impact pathway:

- Laag Badana National Park (restoration near existing forest patches and addressing poaching and environmental awareness issues)

- Daallo Mountain Forest (addressing fragmentation through restoration of connectivity)

- Adalle Marine Protected Area (restoration and conservation planning to address loss of ecosystem services for fishing and enforcement issues)

- Balcad Nature Reserve (alternative livelihoods to reduce pressure on forest)

Descriptions that are incomplete and for which clarifications would be useful.

- Sacadin-Zeylac Archipelago (only notes that it will build on recent community restoration efforts, but does not clarify the drivers of degradation and how activity will match observed gaps)

- Dhahar Protected Area (also only notes that it will build on recent community restoration/protection efforts, but does not clarify how it will address the gaps observed (technical capacity and lack of formal ecological monitoring))

- Eyl-Garacad (clarifies threats and activities, but lacks a clear link between activities and how they are expected to address threats).
- Rooboow Protected Area: Please note the GEF cannot cover ex-post remediation of mining and quarrying activities, which should be covered by developers themselves. Thank you for clarifying how quarrying land restoration could be covered by co-financing, with GEF activities focusing on other needs on this area.
- Chilani & Manari Islands (activities described - restoration, zoning, sustainable livelihoods- but not the threats /gaps they are trying to address)
- Harardheere Protected Area (Absence of patrolling, boundary markers, and inter-stakeholder coordination noted as gaps, but activities only focus on restoration)
- Hobyo Integrated Reserve (will improve ecological integrity and governance through zoning, local awareness, and enforcement strengthening - but this does not address one of the large drivers identified being impending offshore oil exploration).

6. Based on these details, it also appears that most activities to be implemented in the protected areas to be reinforced are restoration and SLM activities. Could you please also clarify the nature of activities that will be implemented in each target area as they relate to protected area establishment and management and to the gaps identified in the METT scores referred to? This is important as for now the project rationale is based on the assumption that the key preliminary intervention to operate on these areas is to establish them as protected areas, but the description of activities only refer to restoration activities and not to the process of establishing these areas as protected in line with the Somalia regulatory framework recently adopted on the matter, along with management effectiveness interventions. Perhaps adding a sub-paragraph in connection with activities on this topic of PA establishment related work could be added for each area, to address this.

RR (7/2/2025):

1. Thank you for addressing the enclosed STAP comment from PIF screening stage - we could not find information on the PIF on this, except briefly noting that the project will contribute to Somalia's LDN target. "In 2020 Somalia completed a LDN Target Setting Program. The PIF uses a map citing that report, and the components could contribute to advance the LDN targets, yet this national commitment is not mentioned at all. The LDN conceptual framework - which is designed under the principles of systems thinking, the centrality of integrated land use planning, and the connection between Drivers-Pressure-State-Impact-Response - could be used to better frame the proposed components. The LDN conceptual framework relies on 19 principles that include embedding the design and implementation of actions to avoid (e.g. PAs) reduce and reverse (e.g. SLM, NbS, EbA, etc) land degradation. The use of this type of framework can help generate a project that is more 'context' based, attending to the limitations of the current socio-cultural and political context, in addition to the ecological context."
2. On the same line, there are 9 specific recommendations on project design listed in the STAP screening on the PIF for this project, and it would be helpful if annex I of the portal CEO ER, which is missing from the current version (table of Responses to Project Reviews) could be added on the portal to clarify how these recommendations have been integrated in project design. This annex table should also include responses to PIF stage comments provided by council members (comments shared by Canada, Germany, US).
3. Please see comments about project component structures in the GEF project overview section.
4. Output 1.1.4 will explore among various financial options carbon credits. Please address in the key risks section how the risks related to this option would be mitigated (price misalignments, markets not materializing, capacities insufficient). Please also note GEF funding would be

expected to cover the exploration and support for establishing enabling systems for carbon credits at national level, not transaction related costs at pilot level, which are usually covered by buyers - in case a pilot is covered under the project through co-financing, please ensure to remove associated GHG impacts from the results reported during implementation.

5. In connection with comments made in the project rationale section regarding description of trends on project target landscapes, could you please clarify in the description of components (and consistently with justifications provided on core indicators) how drivers of degradation in these landscapes will be addressed by project activities?

## Agency Response

6 Oct 2025

2. The comments from Council Members, specifically those shared by Canada, Germany, and the United States, have been reviewed and detailed responses are incorporated in the annex I of CEO ER (page 184) as requested.

3. We acknowledge the comment regarding the internal agency notes mistakenly left in the project document (notably in the title of Figure 1). This has been corrected, and the internal comment has been removed from the document.

5. The project document has been revised to strengthen the logical explanation of impact pathways across all sites. Specifically:

**Laag Badana National Park:** Activities will focus on restoration near existing forest patches, addressing poaching through strengthened enforcement, and raising environmental awareness.

**Daallo Mountain Forest:** The project will address fragmentation by restoring ecological connectivity between remaining forest patches and enhancing community-based protection.

**Adalle Marine Protected Area:** Restoration and conservation planning will prioritize recovery of ecosystem services for fisheries, while also strengthening enforcement capacity to address unsustainable practices.

**Balcad Nature Reserve:** Alternative livelihood opportunities have been integrated to reduce pressure on forest resources, including community-based agroforestry and sustainable enterprise development.

**Sacadin-Zeylac Archipelago:** Clarifications have been added on key drivers of degradation, notably overfishing, unsustainable harvesting, and climate-related pressures. Activities now demonstrate how restoration and co-management will directly address these drivers and respond to existing gaps.

**Dhahar Protected Area:** Revisions clarify that activities will build on community initiatives while addressing technical capacity limitations and establishing ecological monitoring systems to ensure sustainability.

**Eyl-Garacad:** The description has been updated to explicitly link proposed activities (restoration, enforcement, and awareness) with the threats identified, ensuring a clear results pathway.

**Rooboow Protected Area:** The project document clarifies that GEF resources will not be used for ex-post remediation of quarrying activities. Instead, quarrying land restoration will be addressed through co-financing, with GEF focusing on restoration, conservation, and governance activities.

Chilani & Manari Islands: Additional detail has been provided on key threats (unsustainable fishing, pollution, and habitat loss) and how restoration, zoning, and sustainable livelihoods will respond to these.

Harardheere Protected Area: Activities have been expanded to include patrolling, boundary demarcation, and inter-stakeholder coordination, alongside restoration, to directly address the gaps identified.

Hobyo Integrated Reserve: The project description has been revised to explicitly address the threat posed by impending offshore activities, aligning conservation measures and governance strengthening with identified drivers of degradation.

For all sites, the descriptions from page 51 to 57 of the CEO ER have been revised to ensure completeness and logical flow.

6. We appreciate your observation regarding the need to clarify activities related to PA establishment and management, beyond restoration and SLM interventions. For each target site, in addition to restoration and SLM activities, the project will support 1) PA Establishment: Activities will align with Somalia's recently adopted regulatory framework on protected areas. This includes legal designation, gazettment, and boundary demarcation for the proposed sites; 2) Management Effectiveness: Informed by METT score gaps, the project will strengthen institutional and community-based governance, develop site-specific management plans, establish/enhance patrolling and enforcement systems, build technical capacity, and promote stakeholder coordination; and 3) Community Engagement: To ensure sustainability, activities will integrate awareness-raising, co-management approaches, and livelihood alternatives that reduce direct pressure on natural resources. To provide clarity, the revised CEO ER (pages 25-26, 51-57) now includes a dedicated sub-paragraph for each site on PA establishment and management, addressing both the designation of new protected areas and the strengthening of management effectiveness, in alignment with national regulatory frameworks and METT findings.

31 July 2025

1. The project rationale and design have been revised to explicitly reference Somalia's 2020 Land Degradation Neutrality (LDN) Target Setting Programme. The LDN conceptual framework has been used to strengthen the project's systems-based approach, particularly in Components 2 and 3. The revised narrative now integrates the Drivers-Pressure-State-Impact-Response (DPSIR) model to better articulate the causal pathways and feedback loops between land degradation, biodiversity loss, and socio-political fragility. The project's interventions are now framed around the three pillars of LDN: avoiding degradation (e.g., through protected area establishment), reducing degradation (e.g., through sustainable land management), and reversing degradation (e.g., through ecosystem restoration and nature-based solutions). These principles are reflected in the Theory of Change and have been incorporated into the CEO ER and UNDP ProDoc, with changes highlighted in yellow. CEO ER on page 26 and UNDP ProDoc on page 18.
2. A draft Appendix I has been created to address the 9 recommendations/requests from STAP.
3. Project Component Structures have been updated to reflect multiple comments across this review and see detailed in page 24 in the CEO ER and page 27-35 in the UNDP ProDoc.
4. The key risks section has been updated to include a detailed risk analysis related to the exploration of carbon credit mechanisms under Output 1.1.4. This is updated in the CEO ER on page 66 and Risk #7 has been created in the UNDP Risk Log.
5. The CEO ER has been revised to strengthen the explicit link between identified drivers of degradation and the activities under each component. The project uses a systems approach

grounded in the Land Degradation Neutrality (LDN) Framework and the Drivers-Pressure-State-Impact-Response (DPSIR) model to ensure that interventions are directly responsive to degradation dynamics across terrestrial, marine, and coastal ecosystems. This is updated on page 25 of the CEO ER and page 16 and 18 of the UNDP Prodoc.

## **5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project**

**a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**

**b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**

**c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**

Secretariat comment at CEO Endorsement Request

### **Cleared**

RR (11/4/2025):

1. Cleared
2. Cleared

RR (8/1/2025):

1. Thank you for the details. Could you please add a paragraph clarifying whether third party execution alternatives (including other GEF agencies) have been considered and the outcome of this review. Finally, could you please also confirm that the proposed execution services will be at no cost for the GEF, in line with Policy?
2. Could you please increase the size of figure 2 so that it is easier to read?

RR (7/2/2025):

1. Regarding UNDP self-execution, any proposed change in execution arrangement must follow current GEF policy : please consider the policy amendment approved by the Council at its 69th meeting (Annex III page 14: [https://www.thegef.org/sites/default/files/documents/2025-05/EN\\_GEF\\_C.69.12\\_Policy%20Amendments%20to%20Streamline%20the%20GEF%20Project%20Cycle-May%2025.pdf](https://www.thegef.org/sites/default/files/documents/2025-05/EN_GEF_C.69.12_Policy%20Amendments%20to%20Streamline%20the%20GEF%20Project%20Cycle-May%2025.pdf) ) and clarify in regard to which of the criteria the exception would be requested, with appropriate corresponding justification.
2. Could you please increase the size of figure 2 so that it is easier to read?

### **Agency Response**

6 Oct 2025

1. A paragraph has been added to the CEO ER on page 60 and the UNDP Prodoc on page 113. Which is ?During project preparation, alternative execution arrangements, including the engagement of other GEF Agencies such as FAO and UNEP as well as others, were reviewed by the Government. While these agencies have strong technical expertise, UNDP was selected by the Federal Government of Somalia as the Executing Agency under the Direct Implementation Modality (DIM) due to its established operational presence in Somalia, experience in managing complex environmental governance projects in fragile contexts, and ability to ensure fiduciary compliance and risk management. This approach leverages UNDP's comparative advantage in

institutional capacity building and policy support, which are central to the project's objectives. The proposed execution services will be at no cost for the GEF, in line with Policy and provided on page 60 of CEO ER.

2. The size of Figure 2 (CEO ER page 64) has been increased in the revised document to enhance readability.

Given the fragile operational context in Somalia, with limited national capacities, and other challenges, particularly in terms of its governance, security, legal frameworks, and logistical aspects, the UNDP 2021-25 Country Programme cycle follows a Direct Implementation Modality (DIM). This arrangement applies to all the projects and programmes in Somalia, based on an agreement between the government and resident UN agencies. In line with the Internal Control Framework (ICF), there would be distinct roles within the UNDP Country Office to ensure proper delineation of functions between the Executive Decision-Making Role, Project Oversight and Execution Role. Capacity building and skills transfer are an integral part of this DIM arrangement. In accordance with the GEF policy amendment approved at the 69<sup>th</sup> Council meeting, UNDP confirms that the proposed Direct Implementation Modality arrangement is justified under the criteria of 'fragile and conflict-affected states' and 'limited national capacity.' Somalia's institutional landscape remains under development, and the project's complexity, particularly in integrating terrestrial and marine biodiversity conservation, requires UNDP's direct execution to ensure fiduciary, technical, and operational integrity. A detailed justification has been included in the CEO ER, and UNDP Prodoc and the execution arrangement is aligned with the GEF's updated policy on streamlined project cycles. This is updated on page 51 of the CEO ER and Page 105 of the UNDP Prodoc.

2. Figure 2 size has been increased.

### 5.3 Core indicators

**a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?**

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

**Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (11/4/2025):

1. Cleared - thanks for updating core indicators as project implementation progresses.

4. Cleared

RR (8/1/2025):

1. Thank you for the clarification. Please see related comment in the rationale - it seems some of these protected areas pre-existed, although their status on the WDPA database was not very formal (e.g. noted as "not reported"). Could you please clarify and confirm the rationale for considering them as newly created and under 1.1/2.1, and not as improved protected areas effectiveness (1.2/2.2)?

2. and 3. Please see follow up question #5 in project description above and address there.

4. The hectares for improved management (3000 forest, 500 mangrove) were wrongly computed in the EXACT sheet, by only selecting one side of the land use instead of both - hence overestimating the impact. Please consider the simpler option offered in our comments below. Including here a screenshot of what this could look like.

**5.1 FOREST DEGRADATION & MANAGEMENT** If country-specific data are available, please go to Tier 2. Tier 2

Type of forest vegetation that will be managed	Forest degradation level			Fire occurrence		Fire periodicity		Fire impact (% burnt)		Forested area (ha)			Total emissions (tCO2-e)		Balance
	Start	Without	With	Without (y)	With (y)	Without Year	With Year	Without	With	Start	Without	With	Without	With	
Tropical dry forest	Large	Extreme	Low	YES	YES	2	1	25.0%	5.0%	5,000	5,000	D	5,000	D	-597,537 ▼
Mangrove Forest	Large	Extreme	Low	YES	NO	1	1	10.0%	0.0%	1,000	1,000	D	1,000	D	-146,586 ▼
Tropical dry forest	Moderate	Moderate	Low	NO	NO	1	1	1.0%	1.0%	3,000	3,000	D	3,000	D	-120,939 ▼
Mangrove Forest	Moderate	Moderate	Low	NO	NO	1	1	1.0%	1.0%	500	500	D	500	D	-23,806 ▼
Please select	Please select	Please select	Please select	NO	NO	1	1	1.0%	1.0%	0	0	D	0	D	0
Please select	Please select	Please select	Please select	NO	NO	1	1	1.0%	1.0%	0	0	D	0	D	0
Please select	Please select	Please select	Please select	NO	NO	1	1	1.0%	1.0%	0	0	D	0	D	0
Please select	Please select	Please select	Please select	NO	NO	1	1	1.0%	1.0%	0	0	D	0	D	0
<b>Total forest degradation and management (tCO2-e)</b>													<b>274,405</b>	<b>-614,464</b>	<b>-888,869 ▼</b>

\*The selection of "D" corresponds to a default (linear) dynamics of changes. Other selection options include "I" for immediate changes and "E" for exponential - please refer to the guidelines for further explanation of these assumptions.

The alternative is to correct the LUC and cropland modules > (i) removing all inputs to the LUC module, as this is not reforestation we are talking about here, (ii) in the cropland module, compute in two separate lines the hectares of sylvopasture without and with the project to assess impact; (iii) same process for the sorghum. Given that the outputs are expected to be similar in order of magnitude, would rather suggest to follow the above guidance in forest management tab.

RR (7/2/2025):

- Under CI. 1.1 and 2.1, could you please provide the WDPA IDs? Could you please confirm whether all identified hectares reported would be directly covered during the duration of the project (the description notes that this will be a phased approach)?
- For core indicator 3, could you please clarify how the techniques/approaches to be used for restoration of targetted landscape will be adequate in light of the threats/drivers of degradation they face?
- Could you please clarify under core indicator 4 what would be the expected practices covered in these production systems?
- Under core indicator 6, could you please update the EXACT sheet calculation? It would be in particular useful for conservativeness to split the calculation between the restoration hectares (reported under CI3) and the SLM hectares (reported under core indicator 4) : e.g., keeping the same calculation for the tropical try forest and mangrove forest but for 5000 and 1000 ha respectively, and a separate line with a smaller gap for the improved practices in the 3000 ha and 500 ha respectively (pending clarifications on what these practices are) - for example from large initial state, large without the project, to medium with the project.

### Agency Response

6 Oct 2025

1. Thank you for the observation. While some of these sites were previously listed in the WDPA database, their entries were informal and incomplete, often marked as "not reported," and did not reflect a legal gazettement, management framework, or operational status in line with national systems. Due to prolong conflict and civil war, at the time of project design, these areas were not recognized as protected areas, nor did they have approved management plans, governance structures, or financing mechanisms in place. The project, as detailed in the CEO ER (pages 12-16, 25-26, 51-57), supports their formal establishment as protected areas within the national framework, including legal designation, management planning, institutional arrangements, and baseline assessments. Therefore, they are considered as newly created protected areas (1.1/2.1) rather than improvements in management effectiveness (1.2/2.2).

2 and 3. Please refer to follow-up question #5, the requested information has been addressed from page 51 to 57 of the CEO ER.

4. Thank you for your observation regarding the result of the GHG calculation. The issue has been addressed by revising the calculation to correctly account for both sides as suggested. The updated GHG calculation has been uploaded to the GEF portal, and the revised result is reflected in the CEO ER

31 July 2025

1. Under GEF Core Indicators 1.1 and 2.1, a total of seven protected areas have been added to the World Database on Protected Areas (WDPA) with assigned IDs. All identified hectares will be covered during the duration of the 6-year project. To clarify, the term phased approach refers to the fact the establishment of PAs and restoration will be timed over the life of the 6-year project, but all will be covered. Clarification has also been added to the CEO ER on page 59.
2. This is updated in the Core Indicators Section. The restoration strategy has been carefully designed to confront the primary drivers of landscape degradation in Somalia, which include chronic deforestation (often for charcoal and fuelwood), overgrazing, recurrent drought, climate variability, weak land governance, and the proliferation of invasive species such as *Prosopis juliflora*. The targeted landscapes, arid and semi-arid rangelands, degraded riparian zones, and woodlands, have suffered from these pressures over many years, resulting in diminished ecosystem health and reduced livelihood opportunities for local communities. To address these complex challenges, the project employs a suite of context-specific, site-tested, and affordable restoration techniques. These include, assisted natural regeneration, agroforestry, rangeland and riparian rehabilitation, invasive species control and participatory land use planning. These approaches have been deployed in Somalia or more broadly around the Horn of Africa and are grounded in local experience and traditional knowledge and have demonstrated success across Somalia through both donor-supported and community-led initiatives. This is updated on page 60 of the CEO ER and explanatory notes have been added to Annex 17 Core Indicators in the UNDP Prodoc.
3. This is updated in the Core Indicators Section. Under Core Indicator 4, the project will promote improved land and resource management practices across key production systems in Somalia including rangelands, agro-pastoral systems, and smallholder agroforestry. These practices are designed to enhance ecosystem functionality, reduce degradation, and support biodiversity while strengthening livelihoods and resilience. The expected practices include rangelands rehabilitation, improved practices on rainfed croplands, locally adapted agro-pastoral systems and cross-cutting elements include participatory land use planning, reduced reliance on chemical inputs, invasive species control, and community-based governance. These practices are low-cost and tailored to Somalia's socio-ecological conditions, ensuring long-term adoption and impact. This is included on page 60 of the CEO ER and explanatory notes have been added to Annex 17 Core Indicators in the UNDP Prodoc.
4. The FAO EXACT sheet has been updated to reflect a more conservative and disaggregated calculation. Restoration areas (CI3) are now split into 5,000 ha of tropical dry forest and 1,000 ha of mangrove forest. Sustainable land management areas (CI4) are now reported separately as 3,000 ha of agro-pastoral systems, 500 ha of irrigated cropland cultivated with sorghum. Emission reduction estimates have been recalculated accordingly, and the updated FAO EXACT sheet is included in the revised annexes of the CEO ER and UNDP Prodoc.

#### 5.4 Risks

- a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?
- b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?

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

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (11/4/2025):

1. Cleared

RR (8/1/2025):

1. The Key risk line on fiduciary risks notes that the project will be executed by "the CSO" - but project arrangements note that UNDP will execute, with support to the ministry. This seems inconsistent - thank you for addressing.

2. Cleared

RR (7/2/2025):

1. Please see comments on execution arrangements

2. Please adjust the rating under the "Environmental and Social" risk category in line with the rating reported under ESS risk category. The ratings are not consistent as is. Doing so would be in line with the description of the "Environmental and Social" risk category in Annex B of the GEF Risk Appetite document (GEF/C.66/13) stating that: "The rating reported by project under this category is identical to the Overall Safeguards Risk rating provided at PIF, CEO Endorsement, MTR and TE stage."

Agency Response

6 Oct 2025

1. This has been addressed in the Key Risk section of the CEO ER on page 75.

31 July 2025

1. The detailed information is provided in the execution arrangements section.

2. The rating has been updated to Substantial in the risk Category. This is updated on page 63 of the CEO ER. No changes required in the Prodoc.

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

Secretariat comment at CEO Endorsement Request N/A

Agency Response

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

**6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes, already outlined at PIF stage in detail

Agency Response

**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 comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes, already outlined at PIF stage in detail

Agency Response

**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 comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

**7 D. Policy Requirements**

**7.1 Are the Policy Requirement sections completed?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

**7.2 Is the Gender Action Plan uploaded?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

**7.3 Is the stakeholder engagement plan uploaded?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

**7.4 Have the required applicable safeguards documents been uploaded?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (8/1/2025):

1. Cleared

2. Cleared

RR (7/2/2025):

1. The ESS is comprehensive and includes important elements such as the potential development of grievance mechanisms.

a) Regarding Standard 6: Indigenous Peoples, we note an inconsistency between sections 6.1 and 6.2 that should be addressed:

Section 6.1 indicates that the implementing agency has not yet verified whether the project will be implemented in areas where Indigenous Peoples are present. However, section 6.2 states that the project will not conduct activities on lands or territories claimed by Indigenous Peoples.

This response in 6.2 appears premature, as it assumes knowledge about land claims that depends on the verification still pending under 6.1. If the presence of Indigenous Peoples in the project areas has not yet been confirmed, it follows that the status of land claims cannot be definitively stated either. We recommend revising section 6.2 to reflect this pending status?e.g., by indicating that this will be determined following the verification process mentioned in 6.1.

b) Also noting that Somalia is in the FY25 List of Fragile and Conflict-affected Situation, could you please assess within the risks how this situation might affect the project and what actions will be taken to mitigate the situation (please ensure consistency between the key risks section and this one in addressing this comment).

Agency Response

31 July 2025

1.a.) Sections 6.2 has been changed to reflect ?Yes?. This has been updated on page 123 of the CEO ER and Page 178 of the UNDP Prodoc.

1.b.) The issue of conflict is addressed in various risks and more specifically Risk 8 in the SESP on "Access restrictions on land or natural resources by the local community" such that one of the mitigation measures is preparation of a Conflict Sensitivity and Land Tenure Assessment (Output 2.1.2), in which efforts will be made to identify potential disputes or overlaps related to land use, access, and customary tenure. This assessment will help uncover areas of potential conflict and inform the development of appropriate mitigation strategies.

## **8 Annexes**

### **Annex A: Financing Tables**

**8.1 GEF Financing Table and Focal Area Elements: 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 comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

**LDCF under the principle of equitable access?**

Secretariat comment at CEO Endorsement RequestN/A

Agency Response

**SCCF A (SIDS)?**

Secretariat comment at CEO Endorsement RequestN/A

Agency Response

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

Secretariat comment at CEO Endorsement RequestN/A

Agency Response  
Focal Area Set Aside?

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**8.2 Project Preparation Grant (PPG)**

a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement Request

RR (11/10/2025):

Cleared

RR (11/4/2025)

1. This is included in annex D but not reflected on the CEO ER portal view (below)

**ANNEX D: STATUS OF UTILIZATION OF PROJECT PREPARATION GRANT (PPG)**

Provide detailed funding amount of the PPG activities financing status in the table below:

Project Preparation Activities Implemented	GET/LDCF/SCCF Amount (\$)		Amount Committed
	Budgeted Amount	Amount Spent To date	
Contractual Services- Company	6,000.00	4,500.00	1,500.00
Contractual Services- Individual	230,270.00	194,420.00	35,850.00
Travel	25,000.00	14,112.00	10,888.00
Training, Workshops, Meetings	38,730.00	19,357.00	19,373.00
<b>Total</b>	<b>300,000.00</b>	<b>232,389.00</b>	<b>67,611.00</b>

Please reflect all the details from annex D in the CEO ER portal view dedicated table.

Please also note preparation of the CEO ER document itself is supposed to be covered by Agency fee.

RR (8/1/2025):

1. The PPG budget reported is still not in line with guidelines. Please specify the purpose of each line. This should correspond to an activity, not a position title or activity type. Please clarify what the workshops are for, what the travels are for, what the logistical costs were for, what the consultants, contractors and "professional services" worked on specifically, as noted below, in line with guidelines.

RR (7/1/2025):

1. The PPG use reported is not in line with guidelines. Please note that preparation of the project document is supposed to be covered by the GEF Agency Fee and is not an eligible expense. Only inputs to the project design can be covered by the PPG. Please specify each item of expense in line with itemization outlined in the GEF guidelines on the project and program cycle policy, clarifying PPG activities and related expenditure category spending. Each line should clarify the

activity (e.g. travel, technical assessment, workshop, screening) and a purpose (e.g. consultation, technical feasibility, E&S input, fiduciary screening, etc).

Agency Response

**UNDP 9 November 2025**

**Thank you for your comment. The agency adheres to GEF rules, and the status of PPG utilization along with detailed descriptions is reflected in the CEO ER portal view.**

6 Oct 2025

The PPG budget has been revised to comply with GEF guidelines. The revised PPG utilization table is included in Annex D of the CEO ER (page 109).

31 July 2025

The PPG budget has been revised to comply with GEF guidelines. The revised PPG utilization table is included in Annex D of the CEO ER (page 76).

### **8.3 Source of Funds**

**Does the sources of funds table match with the amounts in the OFP's LOE?**

**Note: the table only captures sources of funds from the country's STAR allocation**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

**8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?**

**e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (11/4/2025):

1. The description of costs under recurrent expenditures is inconsistent - it is impossible for recurrent expenditures to amount to 4.5M \$ as these correspond only to cost of using equipment and paying portions of staff salaries for application to the project only, not full costs. It also seems that a large share of described activities are investments, not recurrent expenditures (e.g. ranger stations, etc). We'll consider this inconsistency as an issue of categorization for now - please thoroughly update at MTR stage.

RR (8/1/2025):

1. The description of cash contribution is relatively clear. But this is not the case for the in-kind contribution. The justification provided is still word for word the same as the MOECC one. Except the MOECC one is in line with the expected amount, for recurrent expenditures which are usually not above 1/2 million\$. For the UNDP one it seems some of this financing corresponds to investments and/or to the full costs of infrastructure/staff. Thank you for clarifying in more details for the UNDP co-financing what this corresponds to in terms of articulation with specific project activities, what these infrastructures/staff are and whether it corresponds to full or partial costs. Further, it seems counterintuitive that UNDP would avail infrastructure costs as in-kind, as UNDP is a partner, not a local Somali infrastructure owner. Perhaps this is a categorization issue. Thank you for helping us making sense of this.

RR (7/2/2025):

1. Some clarification would be needed for the UNDP co-financing. As such the justification provided is word for word the same as the MOECC one. Except the MOECC one is in line with the expected amount, for recurrent expenditures which are usually not above 1/2 million\$. For the UNDP one it seems some of this financing corresponds to investments and/or to the full costs of infrastructure/staff. Thank you for clarifying in more details for the UNDP co-financing what this corresponds to in terms of articulation with specific project activities.

Agency Response

**UNDP 9 November 2025**

**Thank you for your comment and noted. The in-kind contribution includes for throughout the project life cycle (72 months). It represents partial, non-reimbursed allocations of existing UNDP resources, not infrastructure ownership. This includes a) Staff Time and Expertise: From UNDP country office technical programme (e.g., staff in Governance & Peacebuilding team, Inclusive Growth team, Sustainable Finance Hub etc.), operations (e.g., for procurement services, HR support, travel planning, payment processing), as well as regional and global experts, for technical advice and backstopping for key project outputs and deliverables not covered by the GEF fee, b) Monitoring, Evaluation, and Knowledge Management: Access to UNDP's corporate M&E platforms, risk management tools, and knowledge management and sharing systems (page 87, CEO ER).**

**The agency will thoroughly review and update the categorization of recurrent expenditures at the MTR stage to ensure consistency and alignment with GEF cost classification guidelines.**

6 Oct 2025

Thank you for your constructive feedback regarding the UNDP co-financing. The detailed clarifications have now been provided in the CEO ER on page from 86 to 88. Specifically, the UNDP in-kind contributions have been further explained in terms of 1) the specific project activities to which they correspond; 2) the staff cost those who will be responsible for providing technical advice and backstopping support for key project outputs and deliverables that are not covered under the GEF fee and 3) whether these represent full or partial costs.

We have also clarified the categorization, ensuring that the in-kind contributions are properly aligned with UNDP's role as a project partner making the UNDP co-financing fully transparent and consistent with GEF expectations.

31 July 2025

The UNDP co-financing has been clarified and differentiated from the MOECC contribution. UNDP's co-financing includes both in-kind and investment mobilized components. Specifically:

In-kind contributions include engagement of technical staff to participate in relevant surveys and technical interventions, utilization of physical assets and infrastructure to facilitate ecosystem restoration, conservation and land rehabilitation activities, and knowledge management support.

Investment mobilized includes under PMC for 1 Full Time Project Coordinator at Federal Government and 6 Regional Project Coordinators at Federal Member States. In addition, the contributions are directly linked with project activities under Outcome 2.1, which focuses on the establishment of legally recognized terrestrial and marine protected areas.

The updated co-financing table and narrative in Annex A now reflect this breakdown and are aligned with GEF Co-Financing Policy and Guidelines. The revised co-financing table is included in Annex A of the CEO ER page 76.

**Annex B: Endorsements**

**8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:**

**Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

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

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (7/2/2025):

Yes

Agency Response

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

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (8/1/2025):

1. Cleared

RR (7/2/2025):

1. The footnote regarding capacity assessment of the execution partner is missing. Please obtain an email from OFP accepting this footnote (this is an alternative to requesting a new letter).

Agency Response

31 July 2025

The footnote regarding the capacity assessment of the execution partner has been included.

**Annex C: Project Results Framework**

**8.6 a) Have the GEF core indicators been included?**

**b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of total project financing (too high? Too low?)**

**c) Are all relevant indicators sex disaggregated?**

**d) Is the Project Results Framework included in the Project Document pasted in the Template?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR(11/4/2025):

1. Cleared

RR (8/1/2025):

1. Could you please see comments in core indicator section and reflect in the results framework as needed? GHG numbers will be expected to be lower.

RR (7/2/2025):

1. Could you please see comments in core indicator section and reflect in the results framework as needed?

Agency Response

6 Oct 2025

We have carefully considered your comments on the core indicator section, and the necessary adjustments have been made to the results framework. The GHG numbers have been revised accordingly as well as uploaded in the GEG portal.

31 July 2025

The comments are addressed in the core indicators section, the core indicators Annex and the Project Results Framework.

**Annex E: Project map and coordinates**

**8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?**

Secretariat comment at CEO Endorsement Request

**Cleared**

RR (11/4/2025):

1. Cleared

RR (8/1/2025):

1. Could you please report this in the right portal entry field?

This information should be provided under the section called "GEO LOCATION INFORMATION" > you will see that the Geo name ID column is for now blank there. Many thanks.

RR (7/2/2025):

1. Do you have the GeoCode ID available for the coordinates provided? it currently appears blank on the portal entry.

Agency Response

6 Oct 2025

The requested information has now been correctly reported in the designated portal entry field under "GEO LOCATION INFORMATION", and the previously blank Geo Name ID column has been updated accordingly.

The GeoCode ID have been included in the CEO ER on page 47 and the UNDP Prodoc on page 146, as well as provided in the portal entry.

**Annex G: GEF Budget template**

**8.8 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?**

**b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?**

**c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?**

Secretariat comment at CEO Endorsement Request

RR (11/10/2025):

a. noted

b. cleared

c. noted

d. cleared

e. cleared

RR (7/2/2025):

a. Compared with the previous submission, the cost of personnel + consultants increased from \$2,892,537 to \$3,012,537 - please amend.

b. Several budget lines do not have any identified "Responsible Entity", while other include UNDP - please allocate a responsible entity for all budget lines.

Contractual Services - Individ	Finance Specialist 21 days * \$350 day = \$7,350 to develop the financial management strategy for the Pas	7,350						7,350			7,350
Contractual Services - Individ	Gender Specialists \$4,758 per month for 72 months = \$342,432	342,432						342,432			342,432
Contractual Services - Individ	Safeguards and Stakeholder Engagement Specialist \$4,758 per month for 72 months = \$342,432	342,432						342,432			342,432
Contractual Services - Individ	Communications Officer \$1,925 per month for 72 months = \$138,600	138,600						138,600			138,600
Contractual Services - Individ	Communications Officer (part time) National \$1,925 per month for 44.2 months = \$85,085	85,085						85,085			85,085
Contractual Services - Individ	Engineer \$1,855 per month for 72 months = \$133,560	133,560						133,560			133,560
Contractual Services - Individ	3 Project Officers \$3,092 total for 72 months = \$667,872	667,872						667,872			667,872
Contractual Services - Individ	M&E Specialist 3,082 per month for 72 months = \$222,624	222,624						222,624			222,624

c. We noticed an M&E specialist has been charged to component 1 but M&E costs should be charged to the M&E component.

Contractual Services - Individ	M&E Specialist 3,082 per month for 72 months = \$222,624	222,624						222,624			222,624
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d. We noticed that 3 project officers have been charged to component 1 but we were not able to locate Terms of reference for this position to assess its nature, neither whether three positions were justifiable.

Contractual Services - Individ	3 Project Officers \$3,092 total for 72 months = \$667,872	667,872						667,872			667,872
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e. The cost of the Project Director is high compared with similar positions in the region - please revise.

Contractual Services - Individ	1 Full Time Project Manager \$6,184 per month for 72 months = \$445,248							-		445,248	445,248
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RR (7/2/2025):

1. Please see comments on execution arrangements.
2. Several costs are charged to M&E that should normally be covered by PMC. this includes the fees and related expenses to inception workshop (which is not M&E related), and printing and creation of other information for knowledge sharing which is project management related (and for the non-equipment related costs could be connected with component 1.2 as noted in project overview above), along with the knowledge sharing/communication coordinator, which is also connected to component 1.2, not to M&E.
3. Printing should be categorized as Operating costs, not Equipment, please revise:
4. IT equipment for project personnel (25 PCs) is charged to components when it should normally be covered by PMC. Could you confirm that such equipments will therefore not be included in contracts covered by components (25 is a significant amount of PCs)? Would be also useful to confirm if this is included in the assets to be transferred to government at the end of the project.
5. It is also noted that a significant budget is charged to components for travel, which is usually charged to PMC. It seems that this is related to the FCV situation of the country - could you please clarify?
6. Please separate different positions under Contractual services ? Individual into one line item for one position, with clear budget allocation to project component, M&E, and PMC as applicable.
7. The budget added up to \$12,248,395 while the component table showed \$12,448,395, a difference of \$200,000. Please revise the budget table for consistency

#### Agency Response

##### **UNDP 11 November 2025**

- a. **Thank you for your observation. According to the initial submission of the GEF budget document, the total amount allocated for personnel + consultancies was USD 3,012,537. Therefore, there has been no change in the total cost for this budget category between the previous and current submissions.**
- b. **The Responsible Party has now been added to all budget lines in the GEF budget template.**
- c. **The M&E Specialist was incorrectly mentioned in the budget note. This position actually refers to a biodiversity assessment and conservation expert, and the correction has been made accordingly. The corresponding TOR has been included in the file uploaded to the Roadmap under ?Somalia\_ToRs GEF ID 11414.?**
- d. **The TOR for the three Technical Project Officers have been included in the file uploaded to the Roadmap under ?Somalia\_ToRs GEF ID 11414. Three Project Officers will be based in Puntland (state level), Somaliland (state level), and Mogadishu (federal level). The Project Management Unit (PMU) will be located in Mogadishu, where the Project Manager will be based. Two Project Officers will be stationed at the state level (Puntland and Somaliland), and one will be based in Mogadishu at the federal level. All three officers will report directly to the Project Manager, and their Terms of Reference (ToRs) will be the same. In brief, the Project Officer supports the Project Manager in planning, monitoring, and reporting to ensure effective project implementation. The role assists in preparing work plans, budgets, and tracking progress against performance indicators. It provides technical support on biodiversity conservation, community-based natural**

**resources management, and ecosystem restoration, ensuring field activities align with project objectives. Additionally, the Project Officer facilitates communication among project stakeholders, assists in organizing meetings and workshops, and contributes to communication and visibility products.**

- e. Thank you for your comment. The contractual services will follow UNDP rules and regulations, specifically the salary scale for National Personnel Service Agreement (NPSA) at level 11 for the Project Manager position. The salary is now revised to read \$5,184 per month.**

31 July 2025

1. The detailed information is provided in the execution arrangements section.
2. The GEF budget template has been reviewed and updated. It now clearly identifies the executing partner for each budget line, ensuring transparency and accountability. Activities and expenditures have been reassigned appropriately across Components, M&E, and PMC to reflect their actual function and purpose. The TORs for all key project staff funded by the GEF grant and co-financing sources have been attached and are aligned with the roles and responsibilities described in the project document. The budget has been revised to reallocate the following items from M&E to their appropriate categories, a) Inception workshop costs have been moved to PMC; b) Knowledge sharing and communication-related expenses, including the coordinator's salary, have been reassigned to Component 1.2; c) Printing and dissemination costs have been distributed across relevant outputs under Components 1 and 4. These adjustments ensure compliance with GEF budget classification guidelines and are reflected in the updated GEF Budget Template.
3. Yes, printing has been categorized under Operating Costs, and the necessary revisions have been made in the budget table.
4. The allocation of 25 PCs will serve multiple functions. Both the knowledge management system and the learning management system are planned to be accessible and updateable online for regional governments and communities. A majority of these devices will be installed in secure regional offices to ensure availability for regional government personnel as well as to provide local communities with access to system capabilities. Additionally, the project team acknowledges the necessity of including a small number of laptops or tablets to facilitate stakeholder engagement and training activities at the local level.
5. We have included additional details in the budget notes to clarify and substantiate the amounts allocated under the travel Quantum Account Codes for each component of the project. The decentralized governance structure in Somalia necessitates extensive in-person engagement with the Federal Government of Somalia (FGS), six Federal Member States (FMS), and local communities to promote inclusive and effective project implementation as well as sustainable development. Given that biodiversity management responsibilities are distributed across multiple levels of government, it is essential to engage local stakeholders to facilitate coordination among the FGS and various ministries, agencies, institutions, and communities within the FMS. Regional stakeholder engagement, capacity building, and joint planning sessions are vital to building trust, securing commitment, and advancing policy and institutional harmonization. Furthermore, local communities are integral partners in conservation and sustainable land management activities, and require support, training, and knowledge-building to effectively participate in these initiatives.
6. Yes, different positions under Contractual Services, Individual have been separated into individual line items, with clear budget allocations to the relevant project components,

including Project Components, M&E, and PMC, as applicable and the necessary revisions have been made in the budget table.

7. Yes, the budget table has been revised to ensure consistency with the component table. The discrepancy of \$200,000 has been corrected, and both tables now reflect a total of \$12,448,395.

**Annex H: NGI Relevant Annexes**

**8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.**

**b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.**

**c) Is the Agency eligible to administer concessional finance? If not, please provide comments.**

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**Additional Annexes**

**9. GEFSEC DECISION**

**9.1. GEFSEC Recommendation**

**Is the project recommended for approval**

Secretariat comment at CEO Endorsement Request

RR (11/10/2025):

technically cleared and recommended for approval

RR (11/4/2025):

Please address final comments (especially budget) and resubmit as soon as possible. Thank you in your resubmission for removing the yellow highlights, as the document will then be ready for council circulation.

RR (8/1/2025):

There are a few revisions remaining. Thank you for revising and resubmitting.

RR (7/2/2025):

Thank you for resubmitting the project highlighting changes made for ease of tracking for the rest of the review process.

**9.2 Additional Comments to be considered by the Agency during the inception and implementation phase**

Secretariat comment at CEO Endorsement Request See above

**9.3 Review Dates**

	<b>CEO Approval</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	<b>7/2/2025</b>	<b>7/31/2025</b>
<b>Additional Review (as necessary)</b>	<b>8/6/2025</b>	<b>10/6/2025</b>
<b>Additional Review (as necessary)</b>	<b>11/4/2025</b>	<b>11/10/2025</b>

**Additional Review (as necessary)**  
**Additional Review (as necessary)**

**CEO Approval Response to Secretariat comments**  
**11/12/2025**