



Strengthening Climate Adaptation, Biodiversity Conservation, and Combating Land Degradation through Ecosystem-based Adaptation in Samoa

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID
11700

Countries
Samoa

Project Name
Strengthening Climate Adaptation, Biodiversity Conservation, and Combating Land Degradation through Ecosystem-based Adaptation in Samoa

Agencies
UNDP

Date received by PM
12/19/2025

Review completed by PM

Program Manager
Katsumasa Tanaka

Focal Area
Multi Focal Area

Project Type
FSP

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
Feb 4, 2026

Yes.

Agency Response

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

Secretariat comment at CEO Endorsement Request
Feb 4, 2026

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
March 27, 2026

a-b) Yes. Thank you for shortening the summary.

Feb 4, 2026

a-b) Not yet. Please keep the summary within the limit of 250 words.

Agency Response

24 Feb 2026: Thank you. The project summary has been summarized to 250 words. CEO ER, Project Summary section ; Prodoc, Title Page, p. 1.

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
Feb 4, 2026

a-c) Yes.

Agency Response

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
Feb 4, 2026

a-b) Yes.

c) N/A

Agency Response

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

March 27, 2026

c) Yes - thank you for the clarifications. Please refer to a new comment added under 5.4 Key Risks below.

Feb 4, 2026

a) Yes.

b) Yes. GEF appreciates and welcomes the close coordination and the synergies created between this project and the IBG IP child project.

c) Not yet.

•On Output 1.2, while it makes sense to utilize an existing mechanism (=Samoa's Loss and Damage Fund) for financing EbA activities from an operational efficacy perspective, it is still conceptually confusing to support adaptation activities via "loss and damage" fund. Please explain how the proposed EbA & Conservation window fits in the overall ToC of the Loss and Damage Fund.

•On Output 1.2, getting a legal structure set up can take a little while especially if new legislation and regulations need to be passed. Please clarify how this project is accounting for this in the timeline.

•On Output 1.2, good practice for many such funds would encourage it to sit outside of government and have a majority non-government board. Is that the plan? If relevant, please refer to Antigua and Barbuda's SIRF fund as another opportunity for lessons learned as that is government-managed.

•On Output 1.2, please make sure that the Agency provides necessary oversight of the fund and regularly report on the management and usage of the grant in the implementation reports of the GEF.

•On Output 2.1, how is the revenue from the blue carbon project managed and used?

•On Output 2.1, please elaborate on how the hybrid seawall and castral protection will be maintained beyond the project life cycle.

d-l) Yes.

Agency Response

14 April 2026: Comment addressed

24 Feb 2026:

On Output 1.2, while it makes sense to utilize an existing mechanism (=Samoa's Loss and Damage Fund) for financing EbA activities from an operational efficacy perspective, it is still conceptually confusing to support adaptation activities via "loss and damage" fund. Please explain how the proposed EbA & Conservation window fits in the overall ToC of the Loss and Damage Fund.

Thank you for this important point. We agree that Loss and Damage (L&D) financing is often perceived primarily as support for residual impacts after adaptation limits are reached (e.g., post-disaster response, recovery, rehabilitation, and addressing economic losses). At the same time, Samoa's Loss and Damage Fund (LDF) Terms of Reference explicitly allow for investments that reduce and manage climate related losses and damages, including actions that strengthen resilience of ecosystems serving as barriers for natural disasters (e.g., coral reefs, mangroves, and coastal forests), as well as restore ecosystems and natural assets post-climate induced disasters in a way that strengthens adaptive capacity and resilience. However, EbA is not positioned as the LDF's core or flagship priority in the current ToR.

For this reason, the project proposes establishing a dedicated EbA/Ecosystem window under the LDF as a targeted, ring-fenced funding stream that strengthens the Fund's ecosystem restoration and nature-based risk reduction function, without redefining the LDF's overarching mandate. Conceptually, this window fits the LDF Theory of Change as follows:

Pathway in the LDF ToC: Ecosystem restoration and protection reduce hazard exposure and vulnerability, thereby preventing and minimizing future climate-induced losses and damages (including avoided economic losses and avoided non-economic losses such as loss of ecosystem services, cultural values, and biodiversity).

Complementarity (not substitution): The EbA window does not replace post-impact L&D functions; it complements them by financing upstream actions that reduce the scale and frequency of L&D payouts over time.

Operational clarity: The window will have explicit eligibility criteria, results indicators, and safeguards aligned with EbA outcomes (restoration, ecosystem integrity, risk reduction, community resilience), ensuring that only activities demonstrably linked to reducing climate-related losses and damages are financed.

In short, the proposed window uses the LDF as an efficient national mechanism while maintaining conceptual integrity: EbA investments are framed as loss-and-damage risk reduction through ecosystem resilience, not as generic adaptation finance.

This clarification has been added to the Output 1.2 in CEO ER, p. 36.

On Output 1.2, getting a legal structure set up can take a little while especially if new legislation and regulations need to be passed. Please clarify how this project is accounting for this in the timeline.

Thank you for this comment. The project explicitly accounts for the time required to establish legal structures by avoiding the creation of any new standalone fund that would require new legislation or regulations. This is one of the key reasons the project proposes to operationalize an EbA/Biodiversity window within Samoa's Loss and Damage Fund (LDF) which is currently in the process of legal establishment as an entity with its own legislation and regulations rather than establish a separate EbA/Biodiversity Conservation Fund.

How this is reflected in the timeline (Output 1.2):

No new legal entity is created: The EbA/Biodiversity window is designed as an internal operational window of the LDF, implemented through the LDF's existing governance and operational procedures, and fully aligned with the LDF Terms of Reference. Therefore, the project does not anticipate a need to develop new enabling legislation for a separate EbA/Biodiversity fund.

Operationalization is administrative/procedural, not legislative: The work under Output 1.2 focuses on operational measures (e.g., window design, eligibility criteria, procedures for appraisal and disbursement, safeguards/SESP integration, M&E and reporting requirements, capitalization

and resource mobilization approach, staffing/operational costings), which can be completed within the project schedule under the LDF framework.

Legal risk is minimized by design: By embedding the EbA/Biodiversity window in the already-established LDF architecture, the project reduces legal lead times and ensures that early-year activities are not delayed by legislative processes; any approvals required are expected to be internal LDF governance approvals rather than parliamentary action.

Thus, operationalization is expected to be primarily administrative and procedural rather than legislative. Legal risk is therefore minimized by design. By embedding the EbA/Biodiversity window within the already-established and government-led LDF architecture, the project aims to avoid the time and uncertainty associated with drafting and passing new primary legislation. At most, only limited amendments, formal administrative endorsements, or internal regulatory adjustments may be required to align the new window with the Fund's final governance and fiduciary arrangements, and these are expected to be substantially faster than a full legislative process. Accordingly, any approvals needed are expected to be mainly internal government, Fund governance, or Cabinet-level approvals, supported by operational guidance documents and procedures, rather than parliamentary action.

On Output 1.2, good practice for many such funds would encourage it to sit outside of government and have a majority non-government board. Is that the plan? If relevant, please refer to Antigua and Barbuda's SIRF fund as another opportunity for lessons learned as that is government-managed.

Thank you for this suggestion. The Agency agrees that credibility, transparency, and donor confidence are typically strengthened when an environmental finance mechanism has independent, skills-based governance and meaningful non-government representation. At the same time, Samoa's chosen approach is to embed the EbA & Biodiversity window within the already-established national Loss & Damage Fund (LDF) to maximize operational efficiency and alignment with national public finance systems.

The project does not assume a wholesale change to the governance arrangements of LDF. Rather, for the purposes of operationalizing the EbA & Conservation window, the project envisages governance arrangements that ensure the window itself is managed with credible, transparent, and sufficiently independent decision-making, while remaining anchored within the broader LDF framework and aligned with Samoa's national priorities. In this context, the project will support the establishment of an initial skills-based governance or advisory arrangement for the EbA & Conservation window, with at least 40% women and representation from civil society, community, private sector, and relevant technical expertise.

This means that the project's intention is not necessarily to reconstitute or alter the mandate of the existing LDF Board as a whole, unless this is later determined by Government and the LDF to be necessary. Instead, the project will work within the existing LDF architecture to define the most appropriate governance modality for the new window, which may include a dedicated subcommittee, advisory panel, or other window-specific mechanism with clear fiduciary, oversight, and decision-support functions. The objective is to ensure that funding decisions for the EbA & Conservation window are not purely governmental in character, and that non-governmental and technical expertise are formally built into the window's governance and review processes without prejudging broader reforms to the LDF's overall governance mechanism.

So, Antigua & Barbuda's SIRF experience is relevant to the project. The project's benchmarking/peer-learning package is explicitly designed to draw lessons from multiple operational models (including government-managed and more independent structures). The Antigua & Barbuda SIRF experience can be incorporated as an additional case to examine how a

government-managed vehicle can still maintain strong fiduciary controls, transparency, and predictable grant-making?and what governance safeguards are needed to preserve credibility with contributors. As such Antigua and Barbuda's SIRF has been added to Section 'Project Outcomes and Outputs' under Output 1.2 under examples of mentor and peer exchanges that the project will be pursuing.

On Output 1.2, please make sure that the Agency provides necessary oversight of the fund and regularly report on the management and usage of the grant in the implementation reports of the GEF.

Thank you for this comment. The Agency will provide full oversight of Output 1.2 in line with UNDP/GEF requirements and will ensure transparent, regular reporting on the establishment and operation of the EbA & Biodiversity window under Samoa's Loss and Damage Fund (LDF). Specifically, the Agency will:

Apply UNDP/GEF fiduciary oversight and assurance for implementation of all project-funded activities under Output 1.2, including compliance with UNDP financial rules, procurement standards, and internal controls, as well as audit and spot-check provisions as required.

Track and report progress and expenditures in GEF implementation reporting, including the PIRs/ Quarterly Reports and relevant financial reports, with clear updates on: governance and operational milestones (e.g., operational manual, eligibility criteria, appraisal and approval processes), capitalization and resource mobilization actions, and any disbursements supported by the project, with purposes and results.

Ensure transparency and accountability by requiring routine documentation and disclosure through LDF reporting channels (as applicable) and maintaining a complete audit trail for all expenditures supported by the project.

On Output 2.1, how is the revenue from the blue carbon project managed and used?

Thank you for the comment. At this stage, there is no established Blue Carbon project in Samoa and therefore no Blue Carbon revenue stream is being generated or managed yet. Under Output 2.1, the UNDP/GEF-SCCF project will design and pilot Samoa's first practical Blue Carbon model (focused on mangroves and seagrass), including the technical, institutional, and governance arrangements needed to enable future revenue generation in a credible and transparent manner.

Accordingly, the project will address revenue management in a phased way:

During project implementation (pilot phase): Activities will focus on establishing the enabling conditions for a future Blue Carbon revenue stream: e.g., feasibility assessment, carbon accounting/MRV approach, governance and benefit-sharing principles, identification of eligible sites and tenure arrangements, stakeholder agreements, and alignment with safeguards.

For post-project/future revenue (once verified credits and sales are possible): The project will develop and consult on a revenue management and benefit-sharing framework that sets out where revenues would be received and held, allocation rules (e.g., reinvestment into ecosystem stewardship, community incentives/livelihood co-benefits, and long-term management costs), transparency and reporting requirements, and governance oversight (including community participation and safeguards). CEO ER, p. 38

On Output 2.1, please elaborate on how the hybrid seawall and coastal protection will be maintained beyond the project life cycle

Thank you for this comment. The project recognizes that the effectiveness of the hybrid EbA seawall/coastal protection measures depends on sustained maintenance and adaptive management beyond the project life cycle. The project therefore embeds long-term operations and maintenance and stewardship arrangements into the design and implementation of Output 2.1, with clear roles for government and communities, and with financing pathways linked to national mechanisms.

First, the hybrid approach (boulders/structural elements combined with mangrove and coastal forest belts) is selected specifically because the living components self-repair and accrete over time when properly protected, reducing reliance on recurrent heavy engineering interventions. Maintenance needs are therefore concentrated on periodic inspections, minor repairs to hard elements, debris removal after storms, and continued protection of mangrove/forest belts (replanting where needed).

Second, the project will formalize post-project responsibility through site-level management arrangements with the relevant public agencies (e.g., MNRE and the relevant local authorities/village governance structures) so that routine inspection and maintenance are incorporated into existing coastal management and public works planning processes (including annual work planning and budgeting where applicable).

And third, local communities in the project sites will be responsible for routine upkeep of the hybrid seawall, including monitoring survival, managing pressures (cutting, grazing, dumping), and organizing periodic replanting (if needed) supported by agreed community by-laws and local enforcement mechanisms. To enable this role, the project will provide targeted capacity building and practical trainings for community members on operation and maintenance requirements, monitoring techniques, basic restoration practices, and local management responsibilities. These arrangements will be supported by agreed community by-laws and local enforcement mechanisms to help ensure sustained upkeep and long-term effectiveness of the intervention.

Additionally, beyond the project, maintenance of the hybrid seawall will be supported through integration into national and local public budgets for coastal resilience/asset maintenance and the project's work under Output 1.2 to operationalize an EbA & Biodiversity window under Samoa's Loss and Damage Fund (LDF), which provides an institutional mechanism that can help sustain priority EbA maintenance and restoration needs over time. CEO ER, section "Project Outcomes and Outputs", Output 2.1

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
March 27, 2026

a) Yes. Thank you for the clarification.

Feb 4, 2026

a) Not yet.

•The link to Land Degradation Neutrality which underpins the GEF-8 strategy has not been made. It would be good to include how this project is contributing to Samoa's LDN targets and the country's national strategy related to the UNCCD or if no targets are in place, how it can provide a stepping stone to get there.

b) N/A

c) Yes.

Agency Response

24 Feb 2026: Thank you for this comment. We agree that the linkage to Land Degradation Neutrality (LDN; SDG 15.3), a core underpinning of the GEF-8 land degradation strategy, should be made explicit. Samoa has an aligned UNCCD National Action Programme (NAP) (2015), which is currently outdated. Samoa also appears among countries that participated in UNCCD's LDN Target Setting Programme, indicating national engagement with the LDN target-setting process, even if quantified national LDN targets are not yet fully consolidated and publicly communicated.

However, the project contributes directly to the three core LDN response pathways (avoid, reduce, reverse land degradation) through: restoration of degraded terrestrial/coastal ecosystems and rehabilitation of ecosystem functions (reverse), sustainable agroforestry and ridge-to-reef watershed measures to reduce erosion and improve slope stability (reduce), and strengthened governance/financing mechanisms (including the EbA & Biodiversity window under the LDF) to sustain land stewardship and prevent future degradation (avoid). These interventions align with LDN's objective of maintaining or increasing land-based natural capital over time. CEO ER, Section C. Alignment with GEF-8 Programming strategies and country/regional priorities, p. 58

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

April 24, 2026

a-b) Yes. The comment has been addressed.

March 27, 2026

a, b) Not yet.

GEF-TF

•The narrative/justification is not reflected in the PDF version, which is the official version of the GEF CER. Please kindly work with UNDP's GEF coordination team and ensure all the information included in the Word version is uploaded to the Portal.

	Number (Expected at PPI)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at YE)
Female	5,000	5,000		
Male	5,000	5,000		
Total	10,000	10,000	0	0

Explain the methodological approach and underlying logic to justify target levels for Core and Sub-Indicators (max. 250 words, approximately 12 steps)

META INFORMATION - SCCF

LDCF false SCCF-B (Window B) on technology transfer false SCCF-A (Window A) on climate Change adaptation true

Is this project LDCF SCCF challenge program? false

*This Project involves at least one small island developing State(SIDS).

SCCF-A

- Thank you for revising the SCCF-A Meta Information sheet.

Feb 4, 2026

a, b) Not yet.

GEF TF

- Please include how they are accounting for the core indicators since there is no note under the CI table.
- In relation to the point above, please clarify which part of the project is going to yield the GHG emission reductions, given that the mangrove and seagrass restoration work will be used for a blue carbon credit pilot and therefore not accounted for.
- Please explain why the GEB?s for sub-indicator 4.3 has been lowered.
- Under CI.1.1, 1.2, and 5.3, please provide the missing WDPA IDs.

SCCF-A

- In the Meta Information section, please select "false" for relation to NAP because Samoa has not formulated its NAP yet. (Based on the agreement between GEF and GCF, the NAP development support will be primarily provided by GCF.)

Agency Response

14 April 2026: The narrative/justification of GEF TF indicators have been added in the portal

24 Feb 2026 Please include how they are accounting for the core indicators since there is no note under the CI table.

All GEF CIs are explained on the pp. 54-55 of CEO ER, section ?Core Indicators? as well as in the Annex 17. GEF Core Indicators, section COMMENTS (explain the methodological approach and underlying logic to justify target levels for Core and Sub-Indicators).

In relation to the point above, please clarify which part of the project is going to yield the GHG emission reductions, given that the mangrove and seagrass restoration work will be used for a blue carbon credit pilot and therefore not accounted for

The explanation of GEF **Indicator 6** - Greenhouse Gas Emission mitigated is provided on the p. 55 of CEO ER and in the Annex 17. GEF Core Indicators, section COMMENTS (explain the methodological approach and underlying logic to justify target levels for Core and Sub-Indicators):

The following inputs were used for carbon gains calculation using FAO Ex-Act Tool (Version 9.3): the current deforestation rate in Samoa is 0.29% for tropical forest and mangroves based on the data between 2010-2020 <https://worldpopulationreview.com/country-rankings/deforestation-rates-by-country>. The project will protect 500 ha of tropical forest and mangroves via establishment of terrestrial CCAs. It will save 5.8% of the CCA area from deforestation in the nearest 20 years after the project start. Additionally, the CI 3, 4, and 5 above their used as the inputs for carbon gains calculations. Plus, the project will construct a hybrid seawall with at least 1 ha of mangrove and 2 ha of forest strips. The resulted carbon gains by the project including implementation (5 years) and capitalization (15 years) periods are calculated as 683,762 tons of CO₂ equivalent (see the Annex G. FAO EX-Act Tool analysis). The area of Blue Carbon project was excluded from the GHG calculations because the project will generate revenue through carbon markets, then the carbon benefits would be sold and transferred to third parties.

Please explain why the GEB?s for sub-indicator 4.3 has been lowered.

- All changes in the CEO ER from PIF are explained in the CEO ER?s ANNEX I - Changes from the PIF in the full project document, pp. 71-73. Specifically for GEF sub-indicator 4.3 (area under agroforestry) the following explanation is provided:

The target has been decreased due to request of local communities to invest more project resources into a hybrid seawall in Savaii and limited availability of land for agroforestry

Under CI.1.1, 1.2, and 5.3, please provide the missing WDPA IDs

- Thank you for the comment. The WDPA ID field can only be provided for sites that are already established and officially recorded in the World Database on Protected Areas (WDPA) (or, for OECMs, in the WD-OECM). For the sites referenced under CI.1.1, CI.1.2, and CI.5.3, the proposed Community Protected Areas/MPAs/OECMs are not yet formally established/ designated and therefore do not yet have WDPA (or WD-OECM) IDs at this stage. They are planned to be established by the project

SCCF-A:

In the Meta Information section, please select "false" for relation to NAP because Samoa has not formulated its NAP yet. (Based on the agreement between GEF and GCF, the NAP development support will be primarily provided by GCF.)

Thank you for the comment. This is noted updated in the portal.

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
April 24, 2026

a-c) Yes.

March 27, 2026

a-c) Thank you for incorporating the risks related to LDF. Since it turned out that the detail plan of the blue carbon projects, including the financial management and governance, is to be determined and the ambiguity remains, please also include fiduciary risk related to the blue carbon initiatives and its mitigation measures.

Feb 4, 2026

a-c) Not yet.

- Please include fiduciary risks associated with the Loss and Damage Fund.

Agency Response

14 April 2026: Thank you. We agree that, given the Blue Carbon initiative is still at a concept development stage and its detailed financial management, governance, revenue flow, and benefit-sharing arrangements will be determined during implementation, a specific fiduciary risk should be reflected more explicitly. The fiduciary risk section has therefore been strengthened to include risks related to the future management of Blue Carbon revenues and associated transactions, including potential weaknesses in governance, revenue allocation, transparency, oversight, and benefit-sharing. The following has been included in the Project Risk Table in the CEO ER (pp. 57-58) and Prodoc (pp. 69-70):

In addition, there is a fiduciary risk associated with the proposed Blue Carbon initiative, as its detailed governance, financial management, carbon-revenue flow, and benefit-sharing arrangements are still to be defined. If these arrangements are not established clearly and transparently before the initiative becomes operational, there is a risk of weak oversight, misallocation or misuse of revenues, disputes over benefit-sharing, and reduced stakeholder confidence. **Mitigation measures:** before any Blue Carbon revenue-generating transactions are undertaken, the project will support the preparation and consultation of a revenue management and benefit-sharing framework that clearly defines where revenues will be received and held, institutional roles and approvals, allocation rules, transparency and public reporting requirements, audit and oversight arrangements, and community participation and safeguards. Any project-supported Blue Carbon activities will also be subject to UNDP financial management procedures, regular financial monitoring, and independent audits, and will not proceed to carbon transactions until governance and fiduciary controls are considered adequate.

24 Feb 2026: Thank you! The following has been added to the risk table for Fiduciary risk (CEO ER, p. 57, section ?Risks to Achieving Project Outcomes?):

In addition, there is a fiduciary risk associated with operationalizing the EbA & Biodiversity window under Samoa's Loss and Damage Fund (LDF), particularly if the LDF's governance, financial controls, and oversight/reporting arrangements are not yet fully established or consistently applied at the time the window becomes operational. The rating for Fiduciary Risk is Moderate

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

Feb 4, 2026

Yes.

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

Feb 4, 2026

Yes.

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

Feb 4, 2026

Yes. Thank you for stating the relevant KMGBF Targets and how the project specifically relates to them.

Agency Response 24 Feb 2026: Thank you. Noted.

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request

Feb 4, 2026

Yes.

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request
Feb 4, 2026

Yes.

Agency Response

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request
Feb 4, 2026

Yes.

Agency Response

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request
March 27, 2026

•Yes - thank you for the clarification.

Feb 4, 2026

- GEF notes that the Agency has submitted Social and Environmental Screening Template, ESMF, Gender Action Plan, and Stakeholder Engagement Plan, with an overall ESS risk classified as Moderate.
- GEF appreciates detailed consultations with local communities to design the project.
 1. Please clarify how the results of the consultations with local indigenous communities were integrated into the project during the PPG.
 2. Please clarify how the project supports existing local indigenous governance in project activities particularly in Component 2.
 3. Please consider incorporating monitoring indicators related to respect indigenous governance mechanisms, and traditional and local knowledge in the project where relevant.

Agency Response

24 Feb 2026:

GEF notes that the Agency has submitted Social and Environmental Screening Template, ESMF, Gender Action Plan, and Stakeholder Engagement Plan, with an overall ESS risk classified as Moderate

Thank you! That is correct.

GEF appreciates detailed consultations with local communities to design the project.

1. Please clarify how the results of the consultations with local indigenous communities were integrated into the project during the PPG.

During the PPG, inputs from local Indigenous communities (through district and village representatives under the *fa'amatai* system) were systematically captured through a national inception workshop (26 June 2025) and dedicated community consultations in Upolu (June 20-21 2025) and Savai'i (22-23 June 2025), and verified via a validation workshop on (30 September 2025). Community feedback was documented in detailed matrices and used to refine both the scope of interventions and their geographic targeting. Specifically, community-identified priorities, e.g., water safety and springs protection, continued/expanded coastal protection (including hybrid seawalls), mangrove and riverbank replanting, nursery support, drainage and floodwater management, reef and marine reserve extensions, and livelihood options such as agroforestry were incorporated into the final selection and packaging of on-the-ground EbA investments under Component 2 (Outputs 2.1?2.3) and the targeting of sites and activities within the nine districts. CEO ER, Key Stakeholders, pp. 44-45

2. Please clarify how the project supports existing local indigenous governance in project activities particularly in Component 2.

Component 2 is explicitly designed to work through (not replace) Samoa's customary indigenous governance, especially the *fa'amatai* system and village *fono o matai* by anchoring on-the-ground EbA investments in district- and village-led decision-making and rule-setting over customary land and nearshore resources. In practice, the Component 2 interventions (Outputs 2.1?2.3) are prioritized and implemented in line with Community Integrated Management Plans (CIMPs) and the existing district/village governance structures that already set local adaptation and resource-management rules (e.g., village by-laws, tapu on fisheries, and district-level arrangements such as Safata's TURF/no-take reserves), ensuring that customary authorities remain the legitimate locus for local approvals and stewardship. The project further reinforces this by establishing community-led Conservation Areas on customary lands and waters (Output 2.2) and by formalizing site-level management arrangements that embed long-term ownership, operations, and maintenance within MNRE and local authorities/village governance structures, with day-to-day stewardship and compliance supported through locally agreed by-laws and enforcement mechanisms (e.g., preventing cutting, grazing, dumping; organizing replanting). CEO ER, Project Strategy, p. 24

3. Please consider incorporating monitoring indicators related to respect indigenous governance mechanisms, and traditional and local knowledge in the project where relevant.

Thank you for your advice! We updated project indicators 17 and 18 to include traditional Samoan practices (ProDoc, section Project Results Framework, pp. 91-92:

Indicator 17: Percentage of adult population in the target districts demonstrating good understanding of EbA benefits and supportive to EbA projects over grey infrastructure, including traditional Samoan adaptation practices

Indicator 18: Number of the project lessons and best practices applied/replicated by other districts of Samoa, including revived traditional Samoan adaptation practices

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
Feb 4, 2026

Yes.

Agency Response
Focal Area allocation?

Secretariat comment at CEO Endorsement Request
Feb 4, 2026

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 Request
Feb 4, 2026

Yes.

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 RequestN/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
Feb 4, 2026

Yes.

Agency Response

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
Feb 4, 2026

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
March 27, 2026

Yes. Thank you for amending the co-financing table.

Feb 4, 2026

Not yet.

•There is inconsistency between the co-financing letter and the CEO Endorsement document regarding the \$2,500,000 co-financing provided by ADBNZ MFAT (or ADB?). Please clarify this discrepancy.

Agency Response

24 Feb 2026: Thank you. Corrected in the CEO ER, section "Confirmed Co-financing for the project, by name and type" (p. 64) and ProDoc, section "Financial Planning and Management" (p. 109) as the following:

***NZ MFAT:** US\$2,500,000 - funds of the New Zealand Ministry of Foreign Affairs and Trade's Climate Finance Project to enhance Samoa's capacity in climate adaptation and biodiversity conservation*

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 N/A

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

Feb 4, 2026

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

Feb 4, 2026

Yes.

Agency Response

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

Feb 4, 2026

a-d) Yes.

Agency Response

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

April 24, 2026

Yes.

March 27, 2026

Please amend Figure 1 as well.

Please provide any further geo-referenced information and map where project interventions are taking place as appropriate.

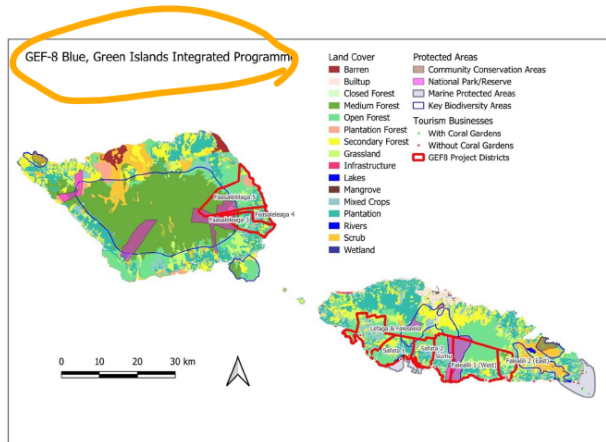


Figure 1. Project Districts: Falealili 1 (West), Falealili 2 (East), Siumu, Safata 1, Safata 2, Lefaga & Faleaseela, Faasalele Faasaleleaga 4, Faasaleleaga 5. The designations employed and the presentation of material on this map do not imply the expression of any opinion whatsoever on the part of the Secretariat of the United Nations or UNDP concerning the legal status of any country, territory, city or area or its authorities, or concerning the delimitation of its frontiers or boundaries.

ANNEX F: ENVIRONMENTAL AND SOCIAL SAFEGUARDS SCREEN AND RATING

Feb 4, 2026

Not yet. The map says "GEF-8 GBI IP" in the title. Please revise the title and the map itself (if relevant).

Agency Response

14 April 2026: Annex E: project map and coordinates has been amended as required. CEO ER, p. 68 . The Figure is also re-uploaded in the portal.

24 Feb 2026: Thank you. The map is correct. The title "GEF-8 GBI IP" has been removed from the map. CEO ER, section ?Project Strategy? Fig 7

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

March 27, 2026

a-c) Yes. Thank you for addressing the comments.

Feb 4, 2026

a-c) Not yet.

- The budget contains lines with unnecessary long explanations, with some items using more than one full page, which is causing the length of the table to spam across multiple pages. Additionally, there are budget lines containing more than one item, which are difficult to assess correctly. Please present a budget with individualized items (activities / positions / expenditures), with concise shorter information (see details below).

Contractual services Company	a) Feasibility assessment of selected mangrove restoration sites and community-based restoration and maintenance of 10 ha of mangroves with Cash for Work approach (~\$16,000/ha): \$160,000 (Output 2.1), Years 2-5 b) Feasibility assessment of selected coastal forest restoration sites and community-based restoration (ANR and targeted planting) and maintenance of 990 ha of forest (~\$596/ha + MNRE co-financing from other projects): \$594,440 (Output 2.1), Years 1-5 c) Feasibility assessment of selected agroforestry sites, design, and establishing agroforestry systems on 300	1,515,440.00					1,515,440.00					1,515,440.00	MNRE
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- Please provide details about the need for International and National consultants for MTR and TE.

International Consultants	a) International Consultant for MTR: \$60/day *10 days = \$10,500 (Output 4.1), Year 3 b) International Consultant for TE: \$85/day *10 days = \$26,000 (Output 4.1), Year 5								45,500.00			45,500.00	UNDP
Local Consultants	a) National Consultant for MTR: \$350/day *20 days = \$7,000 (Output 4.1), Year 3 b) National Consultant for TE: \$350/day *30 days =								17,500.00			17,500.00	UNDP

- Entries for Contractual Services ? Company should be grouped by contract. In other words, each line in the Budget Table should capture a discrete contract to be awarded.

	(GEF)	(SCCF)	(GEF)	(SCCF)	(GEF)	(SCCF)		(GEF)	(SCCF)	(GEF)	(SCCF)		
Contractual services-Company		230,000.00					230,000.00					230,000.00	MNRE
<p>a) Contract with a selected organization to conduct feasibility study to establish LDF's Eba/Biodiversity funding widow (legal, financial & institutional analysis) to identify the best option for Samoa's LDF: \$20,000 (Output 1.2) Year 1</p> <p>b) Contract with a selected organization for development of capitalization and strategic plans & initial resource mobilization (BIOFIN/IVU/PES, donor roundtables) for LDF's Eba/Biodiversity funding widow: \$60,000 (Output 1.2) Years 2-3</p> <p>c) Contract with a selected organization to organize trainings for LDF Board and staff on management, resource mobilization, grant making, and reporting under Eba and Biodiversity funding widow: \$50,000 (Output</p>													

- Please list the different positions in one line/row with associated costs charged to component and PMC as appropriate (see example below for Project Safeguards and Gender Consultant - Project KM and Communications Consultant). Same with the Project Assistant and Local Consultants.

Expenditure Category	Detailed Description	Outcome 1		Outcome 2		Outcome 3		M&E (GEF)	M&E (SCCF)	PMC			the host Agency[1]
		(GEF)	(SCCF)	(GEF)	(SCCF)	(GEF)	(SCCF)			(GEF)	(SCCF)		
	implementation of BGI IP and GEF/SCCF project and \$1,200/month for years 4-5 for 12 months: \$39,600 (Output 3.3), Years 1-5.												
Local Consultants	<p>a) Project Safeguards and Gender Consultant (same as for the BGI IP Project); additional 6 months per year (\$1,400/month) for Years 1-3 (joint implementation of BGI IP and GEF/SCCF project) and \$1,200/month for years 4-5 for 12 months: \$45,600 (Output 3.1), Years 1-5. The Consultant will support gender mainstreaming and SES for all project Components</p> <p>b) Project KM and Communications Consultant (same as for the BGI IP Project); additional \$500/month for Years 1-3 (joint implementation of BGI IP and GEF/SCCF project)</p>						90,000.00	90,000.00				90,000.00	MNRE

- Entries for Travel should be presented by contract. In other words, each line in the Budget Table should capture a discrete contract to be awarded.

Expenditure Category	Detailed Description	Outcome						Sub-Total	PMC				Total (USD\$)	[Excluding Entity receiving funds from the GEF Agency]
		Outcome 1 (GEF)	Outcome 1 (SCCF)	Outcome 2 (GEF)	Outcome 2 (SCCF)	Outcome 3 (GEF)	Outcome 3 (SCCF)		M&E (GEF)	M&E (SCCF)	PMC (GEF)	PMC (SCCF)		
Training, Workshops, Meetings	Annual Project Board Meetings (GEF input): \$2,086 for Years 1							-			2,086.00		2,086.00	MNRE
Training, Workshops, Meetings	Annual Project Board Meetings (SCCF input): \$7,914 for Years 2-5							-				7,914.00	7,914.00	MNRE
Travel	1) Travel for NWSG, for S&E and I&M Working Group members to visit other New Zealand and Pacific SIDS (Vanuatu, Tonga, Fiji) and learn from their experience on E&M coordination and management in the framework of Training/Exchange Program- \$100,000 (Output 1.1), Years 1-5 2) Learning visits for Senior government representatives to Seychelles, Fiji, and/or other SIDS with successful Biodiversity and ecosystem TM models and initial travel expenses for I&M staff related to E&M	162,000.00						162,000.00					162,000.00	MNRE

- GEF will review the budget table again upon resubmission and provide comments as appropriate (i.e. we will calculate the cost personnel as a percentage of the GEF financing - we will also check the positions in light of TORs, etc).

Agency Response

24 Feb 2026: Thank you. All the comments on the budget above have been addressed.

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

April 24, 2026

All comments have been addressed. This project is recommended for approval.

March 27, 2026

Not yet.

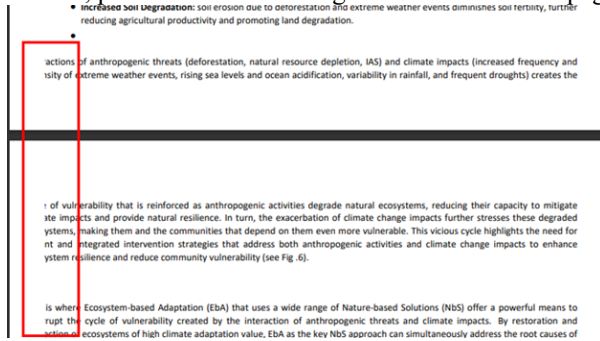
- Please address the remaining comments.

- Please make sure to update Agency's pro doc back-to-back. It appears that not all changes are not properly reflected in the UNDP pro doc (e.g. Output 1.2 and 2.1).

Feb 4, 2026

Not yet.

- Please address the comments above. As the Agency revises the CEO Endorsement Request document, please make sure to update other related documents back-to-back.
- It appears that the second half of the project description section (from Figure 8 onward) is misplaced at the end of the document in the PDF version, likely due to a technical glitch. Please address this issue. If necessary, please coordinate with the ITS team.
- In addition, please correct the margin error that starts at page 17 and spams until page 34.



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

Secretariat comment at CEO Endorsement Request
Feb 4, 2026

- Thank you for submitting this comprehensive and robust CEO Endorsement Request, Annexes, and other relevant documents; however, these documents appear somewhat repetitive/redundant and go far beyond the indicated page/word limits. While it is not necessary to shorten this project's documents, please keep future pro-docs concise when developing upcoming GEF projects. This will help the Agency and GEF Secretariat to expedite the project development and review process and ease recipient countries' access to GEF financing.
- While EbA initiatives have great potential to create adaptation and global environmental benefits, there remains the risks of maladaptation. During the inception and implementation phase, please closely monitor the risks and take mitigating measures as stipulated in the risk section as well as in the ESS documents.
- Please report on the implementation of the GAP in PIR, MTR and TE, in particular, highlighting challenges, lessons learned and best practices, and any adjustments introduced (adaptive management), as applicable.

9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	2/13/2026	3/13/2026
Additional Review (as necessary)	3/27/2026	4/23/2026

CEO Approval Response to Secretariat comments

Additional Review (as necessary) 4/24/2026

Additional Review (as necessary)

Additional Review (as necessary)