



Integrated nature protection in Republic of North Macedonia, through achieving Land Degradation Neutrality (LDN) and biodiversity conservation

Review PIF and Make a recommendation

Basic project information

GEF ID	12301
Countries	North Macedonia
Project Name	Integrated nature protection in Republic of North Macedonia, through achieving Land Degradation Neutrality (LDN) and biodiversity conservation
Agencies	UNDP
Date received by PM	3/20/2026
Review completed by PM	
Program Manager	Alla Ljungman
Focal Area	Multi Focal Area
Project Type	MSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

May 20, 2026

a)-b) Cleared.

April 6, 2026

a) It is important to assess whether the project can generate climate change mitigation (CCM) benefits. The proposed restoration area appears relatively limited (approximately 5,000 ha), and it is not yet clear whether it qualifies as a high-carbon ecosystem. Similarly, the mitigation potential of the 50,000 ha under SLM/SFM interventions will depend on the ecosystem types involved, which also require further specification. In case project can be aligned with CCM 1.4 objective, please add Core Indicator 6.1 and the calculations either in Exact or NEXT tool. If CCM alignment is confirmed, please indicate the sector in the General Project Information table:

Project Sector (CCM Only):	
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If there is no alignment with the CCM 1.4 objective, please use the full flexibility and reallocate funding fully toward the relevant focal areas, such as Land Degradation (LD) and potentially Biodiversity (BD) (make sure the adjustments are made in the Indicative Focal Area Elements table in the Financing Tables Annex A).

The project maps clearly to LD Objective 1 through its policy and governance activities, particularly the development of bylaws on soil protection and establishment of a National Soil Protection Council. The commitment to operationalizing LDN monitoring at both national and local levels is commendable and directly supports the evidence base for tracking progress. The on-the-ground SLM and SFM activities (Output 1.1.4), including improved wildfire management, are directly relevant and well-targeted. LD Objective 2 is addressed through the restoration of 5,550 hectares across forest, pasture, agricultural, and wetland ecosystems, which is a meaningful and verifiable contribution.

The project aligns with BD Objective 1 (Component 2 delivering GEB of 113,597 ha of terrestrial protected ecosystems with improved management). It will contribute to BD conservation through the strengthened management of protected areas, improved ecological integrity, and the establishment of sustainable financing mechanisms. It will apply a clear landscape approach, strengthened policy coherence at landscape level (policy reform Component 1). The project will take place on important KBAs identified: Ohrid Region Heritage Site, the Jablanica Mountains, and two wetland sites Katlanovsko and Monospitovsko Blato (Katlanovsko is a Ramsar site).

b) In general - YES. As part of our GEF-wide effort, we are working with agencies to streamline and refine project titles. For this project, we suggest updating the title to: ?Integrated nature protection in Republic of North Macedonia, through achieving Land Degradation Neutrality (LDN) and biodiversity?. Please note that a new LoE is not required; however, kindly inform the OFP of this change by email.

If it is confirmed that the project generates a significant amount of GHG emission reductions in the AFOLU sector, indicate this sector in the General Project Information table.

Project Sector
(CCM Only):

Agency's Comments

5/20/2026

a.) Thank you very much for this suggestion regarding the full flexibility on programming of funds. We have given it a thought and removed the CCM and adjusted the amounts throughout the financing tables in order to reflect the changes. The scope and scale of the project's restoration and sustainable land management activities will have climate mitigation potential, as such we kept the estimated GHG calculation. The ecosystems targeted for restoration will be including forests and wetlands. Improving the management of pastures and agricultural lands can also have significant carbon sequestration benefits; We have also added core indicator 6.1.

b.) Thank you for the comment. The title has been amended. However, it would seem to still need the word conservation on the end, so it has been retained.

2. Project Summary

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

Secretariat's Comments

April 6, 2026

Yes. Cleared.

Agency's Comments

3 Indicative Project Overview

3.1 a) Is the project objective presented as a concise statement and clear?

b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

Secretariat's Comments

May 20, 2026

Cleared.

April 6, 2021

a) Yes

b)

(1) As part of the situational analysis, particularly for Component 2, please confirm whether baseline data on ecological corridors are available, or whether a landscape-scale assessment of ecological connectivity has been conducted prior to the development of new laws and

improved practices. This should cover all targeted areas, including protected areas, buffer zones, and agricultural landscapes.

(2) In relation to Components 1 and 2, please also provide details on local and traditional practices that may influence the landscape's heritage. Additionally, clarify whether any land-use planning has been undertaken based on these analyses.

(3) The project tracks GEF Core Indicators directly tied to biodiversity outcomes. Please specify the WDPA ID and IUCN category for all protected areas targeted (Jablanica mountains and Monospitovsko Blato are missing).

(4) Under a related outputs please explain how the IAS in the different areas targeted will be managed.

(5) Please integrate gender aspects in the projects components and description in this PIF submission (all project components are relevant in this case, not only component 3) based on initial gender analysis and desk review.

Agency's Comments

5/20/2026

b)

1) Thank you for these comments and suggestions. Ecological connectivity has been identified at the national and regional level, through support from the EU. This will be integrated in the project's target areas, including protected areas. Baseline data on ecological corridors is available, for example, between the Jablanica Mountains (which have been identified as part of the European "Green Belt") and Lake Ohrid basin, but further data and analysis is needed to improve the granularity for appropriate implementation and management. Landscape-scale connectivity assessments have not been conducted. We have noted this in the PIF.

2) Thank you for this comment however we are not certain we fully understand the comment in relation to which aspects of the landscape's heritage may be affected by local and traditional practices, but in general, the Lake Ohrid UNESCO World Heritage Site includes cultural heritage as well as natural heritage, which is within the Lake Ohrid and Prespa basins, which are among the project's target areas. With regard to land use planning, various levels of spatial planning have been done in the project target areas (though spatial planning is primarily conducted at the national level), but the "analyses" referred to in this feedback comment is unclear, and therefore we are not able to clarify on this point. In the Ohrid region sub-national spatial planning was carried out in 2010 for the period up to 2020, and this plan could be updated under the proposed project.

3) The WDPA ID and IUCN categories are specified for protected areas in the core indicators sheet, where available. The information for Jablanica Mountains is specified, and Monospitovsko Blato does not currently have a WDPA ID, but its IUCN category was included. The process for finalizing the declaration of this protected area is being completed, and then it's category will be confirmed and WDPA ID updated.

4) Thank you. We have added summary information on IAS management measures. At the PIF stage, more detailed descriptions of activities are not feasible, but overall, controlling invasive fish such as *Gambusia holbrooki* in North Macedonia's wetlands and lakes would

combine prevention, early detection, targeted eradication where feasible, and long-term containment and habitat management. The first priority is to prevent any further intentional or accidental introductions, including use of *Gambusia* for mosquito control, and to establish a basic surveillance and reporting system for high-risk wetlands, lake margins, canals, fishponds, and restoration sites. Where populations are newly detected or confined to small, isolated ponds, drainage channels, wetland cells, or fishponds, managers should pursue rapid removal through draining, drying, fine-mesh netting, trapping, electrofishing where appropriate, and installation of barriers or screens to prevent recolonization. In larger lakes or connected marsh systems, full eradication is unlikely to be realistic, so efforts should focus on containment, preventing spread to uninvaded sites, protecting native fish and amphibian refugia, and restoring habitat conditions that favor native species rather than invasive live-bearing fish. Wetland restoration designs should therefore include controllable inlets and outlets, screened water connections, seasonal drying where ecologically appropriate, structurally complex vegetation, and isolated fish-free breeding areas for amphibians and other sensitive species. These measures should be supported by public awareness, coordination with mosquito-control and fisheries authorities, and integration into broader invasive alien species management and protected-area planning.

5) Thank you for the comment. Gender aspects have been indicated in Components 1 and 2, based on the initial gender analysis and Gender Action Plan.

3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's Comments
 May 20, 2026

Cleared.

April 6, 2026

In general - Yes. Gender is addressed through a GAP and sex-disaggregated indicators; knowledge management is embedded in Component 3. and it is noted that gender dimensions will be further analyzed during PPG. However, as per GEF Guidelines, the Agency is requested to integrate gender aspects in the projects components and description in this PIF submission (all project components are relevant in this case, not only component 3) based on initial gender analysis and desk review.

M&E is separately funded, however, GEF Resources allocated to M&E are 5.4% - for projects up to \$5 million, the recommended threshold is 5% - please revise.

Monitoring and Evaluation (M&E)						
M&E	Technical Assistance	Outcome 4.1 Project implemented in an accountable and transparent manner, with results documented and available to the public	Output 4.1.1 Project Monitoring Output 4.1.2. Project Evaluation	GET	206,000.00	1,600,000.00
Sub Total (\$)					3,816,327.00	29,900,000.00

Agency's Comments
 5/20/2026

As per above comment under 3.1.b)(5), gender aspects have been explicitly mentioned in all components, based on the initial Gender Analysis and Gender Action Plan.

The M&E budget has been adjusted to be within the 5% threshold.

3.3 a) Are the components adequately funded?

b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?

c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

May 20, 2026

Cleared.

April 6, 2026

a)-c) Yes. Only M&E needs to be revised.

GEF Resources allocated to M&E are 5.4% - for projects up to \$5 million, the recommended threshold is 5% - please ask the Agency to revise.

Monitoring and Evaluation (M&E)						
M&E	Technical Assistance	Outcome 4.1 Project implemented in an accountable and transparent manner, with results documented and available to the public	Output 4.1.1 Project Monitoring Output 4.1.2. Project Evaluation	GET	206,000.00	1,600,000.00
Sub Total (\$)					3,816,327.00	29,900,000.00

Agency's Comments

5/20/2026

Thank you for the comment. This had been revised.

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's Comments

May 20, 2026

Noted. Cleared.

April 6, 2026

a)-b) Yes, in general. However, wildfires have been identified as a major driver of habitat loss, but the project does not clearly include a fire management or post-fire ecological recovery activities. Please clarify and include wildfire management in the development of new management plans, or in the development of new practices (components 1 and 2).

Agency's Comments

5/20/2026

Thank you for this comment. Improved wildfire management was mentioned under Output 1.1.4, but has now been strengthened, with the mention of attention to fire management, and post-fire ecological restoration.

4.2 JUSTIFICATION FOR PROJECT

- a) Is there an indication of why the project approach has been selected over other potential options?
- b) Does it ensure resilience to future changes in the drivers?
- c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?
- d) are the relevant stakeholders and their roles adequately described?

Secretariat's Comments

May 20, 2026

Cleared.

April 6, 2026

- a) Yes. The PIF contrasts a business-as-usual scenario against the integrated landscape approach, justifying selection based on the failure of fragmented, sector-specific interventions to achieve systemic change.
- b) Yes.
- c) Yes. The PIF references lessons on scaling isolated pilots, links to the BIOFIN project, and builds on baseline government investments in forestry and agriculture.
- d) Yes. Key stakeholders ? MoEPP, municipalities, protected area authorities, civil society, and private sector are identified with clearly differentiated roles across policy, implementation, and community engagement.

Agency's Comments

5 B. Project Description

5.1 THEORY OF CHANGE

a) **Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?**

b) **Are the key outputs of each component defined (where possible)?**

Secretariat's Comments
May 20, 2026

Noted. Cleared.

April 6, 2026

a) Please provide a readable ToC diagram.

Yes. Three interlinked causal pathways are clearly articulated with key assumptions, and barriers. Suggest outputs on land-use planning explicitly incorporate wildfire management, identified as a barrier

b) Yes. Outputs are well-defined across components. Output 1.1.4 includes wildfire management under SLM, but land-use planning outputs should also explicitly reference wildfire given its identification as a key barrier.

Agency's Comments
5/20/2026

a) Thank you, A ToC diagram with improved ability to zoom in on the text will be provided as appropriate in the portal. Output 1.1.4 mentions wildfire management, and this has been strengthened further and made more explicit in the document as relevant in this stage of the project development process. Also please see response under point 4.1. above.

b) Please see above, and response to point 4.1 above.

5.2 INCREMENTAL/ADDITIONAL COST REASONING

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

Secretariat's Comments
May 20, 2026

Cleared.

April 6, 2026

Yes.

Agency's Comments
5.3 IMPLEMENTATION FRAMEWORK

a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?

b) Comments to proposed agency execution support (if agency expects to request exception).

c) is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area

d) are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

Secretariat's Comments

May 20, 2026

Cleared.

April 6, 2026

a) Yes. MoEPP is identified as executing entity with UNDP as GEF Agency. Key partners across government, municipalities, and civil society are listed with clear roles and a sound rationale.

b) No exception requested. UNDP will not play an execution role; national execution under MoEPP is proposed. Potential gaps will be assessed and addressed during the PPG phase.

c) Yes. Coordination with BIOFIN, IUCN ADAPT 2.0, GIZ, and SIDA is described. EU approximation alignment and linkages to UNCCD, CBD, and UNFCCC commitments are also referenced.

d) Yes. Component 3 dedicates outputs to knowledge products, training, and a joint PA communication plan. At least five knowledge products and a unified promotional strategy are proposed.

Agency's Comments

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

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

Secretariat's Comments

May 20, 2026

Cleared. The Ex-Act tool with GHG emissions reduction amount is noted.

April 21, 2026

a) Please add CI 6 and calculation methodology (NEXT, Exact etc.) if justified. Please see the related comment in section 1.

b) Yes, GEB related to CCM objectives to be assessed and added if justified.

Agency's Comments
5/20/2026

a) Thank you for the comments and earlier suggestions related to programming flexibility. We have calculated the potential of GHG savings using the EX-ACT tool. Detailed information on the calculation methodology is included following the core indicators table in the PIF. We will re-visit the GHG potential during the PPG stage.

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

Secretariat's Comments N/A

Agency's Comments
5.6 RISKS

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

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 screened and rated at this stage and consistent with requirements set out in SD/PL/03?

Secretariat's Comments
May 20, 2026

Cleared.

April 21, 2026

a) Yes. The risk categories are assessed with mitigation measures clearly outlined.

b) Yes. The overall moderate residual risk rating appears appropriate.

c) Yes. A PIF phase pre-SESP is completed and rated moderate. Full SESP, ESMF, and Grievance Redress Mechanism are committed to during PPG, consistent with requirements at PIF phase.

Agency's Comments
5.7 Qualitative assessment

a) Does the project intend to be well integrated, durable, and transformative?

b) Is there potential for innovation and scaling-up?

c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's Comments
May 20, 2026

Cleared.

April 21, 2026

a)-c) Yes.

Agency's Comments

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

6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?

Secretariat's Comments

May 20, 2026

Cleared.

April 21, 2026

Yes for LD and BD. The CCM focal area objectives alignment need to be clearly assessed and justified.

Agency's Comments

5/20/2026

Thank you again for this suggestions, we did revisit the CCM programming direction removed it but kept the mention on GHG savings potential to be further clarified/revisited during the PPG stage. Please see above comments.

6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors)

Secretariat's Comments

May 20, 2026

Cleared.

April 21, 2026

The project should also ensure alignment with EU standards, including the Natura 2000 network and the EU Nature Restoration Law, particularly given North Macedonia's long-standing EU accession aspirations. Please request the agency to clarify how such alignment will be achieved, especially in light of the EU's target to restore at least 20% of its land and sea areas by 2030.

Agency's Comments

5/20/2026

Thank you for this comment, we agree. The PIF has been revised to clarify alignment with EU standards, including Natura 2000, the EU Habitats and Birds Directives, and the EU Nature Restoration Regulation. The project will contribute to North Macedonia's EU approximation and long-standing EU accession objectives by strengthening protected-area

governance, management planning, ecological connectivity, and zonation in line with EU legislation and IUCN criteria. During PPG, the project will further assess how target landscapes, restoration priorities, and management measures can support Natura 2000-related requirements and be aligned with the EU Nature Restoration Regulation's objective to put restoration measures in place across at least 20% of land and sea areas by 2030. This alignment will be operationalized through Component 2, particularly Output 2.1.3 on protected-area zonation and ecological coherence, and through Component 1 restoration and LDN interventions in priority forest, wetland, agricultural, and pasture landscapes.

6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat's Comments
May 20, 2026

Cleared.

April 21, 2026

Yes. The PIF explicitly identifies contributions to 10 of the 23 KM-GBF targets (T1, T2, T3, T4, T8, T10, T11, T14, T19, T20, T21), with clear linkages to project activities.

Agency's Comments

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments
May 20, 2026

Cleared.

April 22, 2026

Yes.

Agency's Comments

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

Secretariat's Comments
May 20, 2026

Cleared.

April 22, 2026

It is noted that either IPLCs or civil society organizations have been consulted in project design phase. Considering their important role in this project, Agency should clarify why and

if possible, provide additional information on the statement that ? Representatives from national parks and protected areas have been consulted through official central channels with the Ministry?.

Agency's Comments

5/20/2026

Thank you for this comment. Please see response under section 8.7 below, related to the similar topic.

8 Annexes

Annex A: Financing Tables

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

STAR allocation?

Secretariat's Comments

April 22, 2026

Yes.

Agency's Comments

Focal Area allocation?

Secretariat's Comments

May 20, 2026

Cleared.

April 22, 2026

Yes. However, the LD-STAR allocation in Portal (\$1,997,821 - left-hand side) is higher than the allocation in LoE (\$1,740,000 - right-hand side). A new LoE is required.

Sources of Funds for Country Star Allocation

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Sources of Funds	Total(\$)
UNDP	GET	North Macedonia	Climate Change	CC STAR Allocation	800,000.00
UNDP	GET	North Macedonia	Land Degradation	LD STAR Allocation	1,997,821.00
UNDP	GET	North Macedonia	Biodiversity	BD STAR Allocation	1,739,999.00
Total GEF Resources(\$)					4,537,820.00

GEFTF	UNDP	BD STAR Allocation	1,766,137	167,783	60,347	5,733	2,000,000
GEFTF	UNDP	LD STAR Allocation	1,536,539	145,971	52,502	4,988	1,740,000
Total GEF Resources			4,009,133	380,867	136,986	13,014	4,540,000

Agency's Comments

5/20/2026

Fully noted, thank you. An updated LoE will be submitted, with apologies for delays incurred.

LDCF under the principle of equitable access?

Secretariat's CommentsN/A

Agency's Comments

SCCF A (SIDS)?

Secretariat's CommentsN/A

Agency's Comments

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

Secretariat's CommentsN/A

Agency's Comments

Focal Area Set Aside?

Secretariat's CommentsN/A

Agency's Comments

8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

April 22, 2026

Yes.

Agency's Comments

8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat's Comments

May 20, 2026

Cleared.

April 22, 2026

Yes. The officially signed co-financing letters will be required at CEO Endorsement/Approval.

Agency's Comments

Annex B: Endorsements

8.4 Has the project been endorsed by the country? (ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?

Secretariat's Comments

May 20, 2026

Cleared.

April 22, 2026

Yes.

Agency's Comments

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

Secretariat's Comments

April 22, 2026

Yes.

Agency's Comments

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

Secretariat's Comments

May 20, 2026

Cleared.

April 22, 2026

Yes.

Agency's Comments

8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?

Secretariat's CommentsN/A

Agency's Comments

Annex C: Project Location

8.6 Is there preliminary georeferenced information and a map of the project's intended location?

Secretariat's Comments

May 20, 2026

Cleared.

April 22, 2026

Yes.

Agency's Comments

Annex D: Safeguards Screen and Rating

8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?

Secretariat's Comments

April 22, 2026

We note that UNDP has attached Environmental and Social Safeguard Screening document. An overall ESS risk is classified as Moderate.

(1) It seems there was no consultation with local communities, particularly vulnerable groups including small scale farmers and pastoralists during preparing PIF. Please clarify how UNDP had consultations with local communities, particularly the vulnerable groups to define priority and needs of the project, and environmental and social risks screening, and how the results of consultations were integrated into the project concept.

(2) If there was no consultation with local communities and vulnerable groups, please ensure in-depth consultations with local communities particularly vulnerable groups including small-scale farmers and pastoralists, and integrate results of the consultation into the project design including priority of the project during PPG. Please also revise environmental and social screening based on in-depth consultations with local communities.

(3) Please consider local communities not only as beneficiaries, but also as project partners throughout the project design and implementation.

(4) Please also consider respecting local governance and local knowledge and supporting local communities? capacity building as a part of the project.

Agency's Comments

5/20/2026

Thank you for the comment and fully noted.

(1) In addition to the consultations already reflected in the PIF with the Ministry of Environment and Physical Planning and relevant national focal points, it is important to note that the Ministry, as part of its regular procedures for the proclamation and management planning of protected areas and national parks, undertakes a series of technical studies, including socio-economic assessments. These studies are developed through consultations with local communities (including vulnerable groups) civil society organizations, and relevant local stakeholders, including groups whose livelihoods may be affected by protected area management regimes, such as small-scale farmers, livestock keepers, and other resource users. Through these processes, the Ministry seeks to ensure that local needs, socio-economic dependencies, potential restrictions, and development priorities are identified and reflected in the planning and decision-making process. The purpose is not only to comply with legal and procedural requirements, but also to build local ownership of the process and ensure that conservation objectives are balanced with the needs and livelihoods of the communities living in and around the targeted areas. In the context of the proposed project areas, including Jablanica Mountain, Ohrid, Prespa, Monospitovo Bog and Katlanovo Marsh, consultations have taken place through previous or ongoing processes related to protected area proclamation, management planning, biodiversity conservation, environmental assessments, local development planning, or other relevant initiatives led by the Ministry, municipalities, public institutions managing protected areas, and civil society organizations. These processes could provide a useful basis for understanding community priorities, livelihood concerns, and potential environmental and social risks.

(2) While keeping in mind the above, at the same time, we recognize that the PIF stage may not have included a fully dedicated and in-depth consultation process with local communities and vulnerable groups specifically related to this project concept, even if the concept is informed by those previous consultations. Therefore, during the PPG phase, UNDP and

MoEPP will ensure a structured and inclusive consultation process in the targeted project areas, with particular attention to vulnerable groups, small-scale farmers, women, youth, and other groups whose livelihoods or access to natural resources may be affected by project activities. The results of these consultations will be used to further refine the project design, confirm local priorities and needs, identify potential environmental and social risks and mitigation measures, and update the Environmental and Social Safeguards screening as needed. This will also help ensure that community perspectives are properly reflected in the final project document, results framework, stakeholder engagement approach, and implementation arrangements.

(3) Local communities will definitely be engaged as project partners throughout the detailed project design and implementation. They form a core set of stakeholders that are critical for the proper design and functioning of the project, in order to achieve the foreseen results. This will be tackled much more significantly during the detailed PPG phase, but will be codified in the project's Stakeholder Engagement Plan, which will be developed during the PPG.

(4) The project will ensure that local governance is respected, and local knowledge will be strengthened through capacity development activities targeting local communities. For example, this will be supported under Output 2.1.4 relating to sustainable consumption and production practices, integrating historically sustainable practices based on local knowledge, while further leveraging this knowledge in the amplification of revenue generation opportunities and training for engagement in market opportunities such as ecotourism, and production of authentic local products.

Annex E: Rio Markers

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

Secretariat's Comments
April 22, 2026

TBC

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments
April 22, 2026

Climate change mitigation will need to be removed in case there is no GEB will be generated.

Agency's Comments

5/20/2026

Thank you again for this suggestion and fully noted. CCM has been removed from the programming directions however we kept the mention on the GHG calculations base don EX-ACT tool with the result of potential GHG mitigation of more than 5,000,000 tCO₂e.

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments N/A

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments

May 20, 2026

All comments have been addressed. The project is technically cleared and recommended for the PPG phase.

April 22, 2026

Not yet.

Agency's Comments

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

Secretariat's Comments

May 20, 2026

The Agency's response to item 2) in Section 8.7 is reproduced below for reference during the PPG phase: "During the PPG phase, UNDP and MoEPP will ensure a structured and inclusive consultation process in the targeted project areas, with particular attention to vulnerable groups, small-scale farmers, women, youth, and other groups whose livelihoods or access to natural resources may be affected by project activities. The results of these consultations will be used to further refine the project design, confirm local priorities and needs, identify potential environmental and social risks and mitigation measures, and update the Environmental and Social Safeguards screening as needed. This will also help ensure that community perspectives are properly reflected in the final project document, results

framework, stakeholder engagement approach, and implementation arrangements. UNDP and MoEPP will ensure a structured and inclusive consultation process in the targeted project areas, with particular attention to vulnerable groups, small-scale farmers, women, youth, and other groups whose livelihoods or access to natural resources may be affected by project activities. The results of these consultations will be used to further refine the project design, confirm local priorities and needs, identify potential environmental and social risks and mitigation measures, and update the Environmental and Social Safeguards screening as needed. This will also help ensure that community perspectives are properly reflected in the final project document, results framework, stakeholder engagement approach, and implementation arrangements."

April 22, 2026

During the PPG phase:

- (1) please specify which NBS the project will implement.
- (2) in addition, the project strategy should explicitly reference compliance with the EU Habitats Directive, which requires appropriate assessments for any new plans or projects. All new protected area management plans should be designed to align with Natura 2000 requirements from the outset.
- (3) the project should also ensure alignment with EU standards, including the Natura 2000 network and the EU Nature Restoration Law, particularly given North Macedonia's long-standing EU accession aspirations. Please request the agency to clarify how such alignment will be achieved, especially in light of the EU's target to restore at least 20% of its land and sea areas by 2030.
- (4) regarding biodiversity monitoring, the project proposes tracking a set of flagship species across the two main landscape types. While these indicators are ecologically meaningful, the current selection appears relatively narrow. The monitoring framework could be strengthened by broadening the range of indicator species to include invertebrates, endemic plant species, and freshwater biodiversity beyond fish, particularly given that Lake Ohrid is one of the world's oldest lakes, with exceptional levels of endemism. Establishing a more comprehensive species baseline would provide a fuller picture of ecosystem health. Please consider expanding the set of monitored species accordingly.
- (5) In the development of the Gender Action Plan, please ensure that the findings from the gender analysis informs the preparation of the GAP and that these are reflected in the project components. Please ensure that in the development of the project results framework, gender-specific indicators are included to facilitate monitoring and reporting. Please indicate measures to facilitate and support the implementation of the GAP (e.g., budgets, regular monitoring, adaptive management, etc.). Please make a reference to include in PIRs, MTRs and TE, reports on gender-specific results, including the implementation of the Gender Action Plan
- (6) The officially signed co-financing letters will be required at CEO Endorsement/Approval.

Agency's Comments

[5/20/2026](#)

Thank you very much for the suggestions and insights, well noted. These elements will be addressed during the PPG.

Review Dates

PIF Review

Agency Response

First Review

4/22/2026

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)

Additional Review (as necessary)