



# Biodiversity Conservation in Indigenous Lands

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

11508

**Countries**

Brazil

**Project Name**

Biodiversity Conservation in Indigenous Lands

**Agencies**

Funbio

**Date received by PM**

4/1/2024

**Review completed by PM**

4/25/2024

**Program Manager**

Sarah Wyatt

**Focal Area**

Biodiversity

**Project Type**

GBFF

**PIF  
CEO**

**Part I - General Project Information**

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

Secretariat comment at CEO Endorsement Request  
4/5/2024

Yes.

Agency Response

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

Secretariat comment at CEO Endorsement Request  
4/24/2024

Yes.

4/5/2024

No. Please add a specific paragraph to justify the importance of this project for CCA. There is a strong case to be made for how this can support CCA for vulnerable populations, but it needs to be explicit in the text.

Agency Response We added the importance of the project for CCA in the project rationale session.

**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  
4/24/2024

Yes.

4/5/2024

No. For the most part this is good, it would be better to describe Indigenous peoples and their organizations as the primary groups executing this project rather than as beneficiaries - placing the emphasis on the fact that they are the ones developing and doing the project activities.

Minor: Add people at the end of the last sentence.

Agency Response We adjusted the text to better explain the role of the indigenous people.

### **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

4/24/2024

Yes.

4/5/2024

No.

a. No, the objective should be one to two sentences. It can stop at the first sentence and add something like "by supporting Indigenous communities to implement their own Territorial and Environmental Management Plans"

b. No, we very much appreciate the concise nature of the language here, but these need to be numbered and elaborated some especially at the level of output. It is understandably challenging to write outputs for the wide variety of activities that will be covered as based on the PGTAs.

Also, "milestones in Brazilian Policy for Indigenous Peoples" is unclear and should be edited. Perhaps it could be something about good pilots or examples.

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More elaboration is needed of the project components that start on page 24.

c - No, Some of the activities and subcomponents explained in the Gender Section have no correlation with the ones in the Project indicative table. Please ensure coherence in particular, with those activities directed to empower women's participation in the development of sustainable use of natural resources frameworks, policies, trainings, and capacity building activities. Ensure that financial and income generation activities are directed to or benefit women and women led organizations.

In Component 4, and as stated in the gender section, KM products should be gender responsive. Under Component 5, ensure that the gender dimensions are reported and monitored on. Please upload the GAP.

d, e - Yes.

#### Agency Response

a. Objective was adjusted

b. We updated the text to give more information and change the "milestones...." to "Representative examples of the Policy for Indigenous Peoples" it was a translation mistake.

Description to individual TIs are moved to the end of the text. Dourados is the most challenging IL to work in the project, but there is the right momentum there to start restoration and implement sustainable agriculture, which would enrich biodiversity back to the area. It's challenging, but if the project succeeds it would be a great example to all other ILs in Brazil. We adjusted the text on Dourados IL to make the case clear.

c. text was adjusted to ensure coherence and GAP was uploaded

#### **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

4/5/2024

Yes.

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

4/24/2024

Yes.

4/5/2024

No.

a. No, please revise language based on the other edits offered here. Please include assumptions.

b. No, please expand on this topic some.

c. No, see other comments.

l. No, please discuss the innovative and transformative nature of this project in terms of approach.

d-m Yes or N/A

### Agency Response

a. we adjusted the text and included assumptions in the ToC

b. We included a session on the alternative scenario, lessons learned from other initiatives are also on different parts of the text.

c. The text in components was adjusted as indicated in other comments

l. we included the innovation nature of the project in a specific session.

### **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

4/24/2024

Yes.

4/5/2024

Yes.

c. (i) The definition of how investment mobilized was identified is confusing as it refers to *ongoing projects that are being considered for co-finance include some that will start in the following months?*, in which case the type of co-financing should be *public investment?*. Additionally, it also says that *An estimate of the co-finance of recurring costs by governmental agencies will also be calculated?* but these calculations should have been done at CEO Endorsement ? please ask the Agency to amend.

(ii) Please include *Type of co-financing?* for the GIZ ? also, please include the English version of letter.

During inception and throughout the project, please document this for co-financing and within PIRs. There are numerous initiatives from NGOs and donors to support these territories that could likely be counted as co-financing and work together.

#### Agency Response

c. Corrected the text and include the type of cofinance for the GIZ.

We uploaded a translation of the letter

We also believe there will be more co-finance in the future, this will be monitored and reported - we include this in the co-finance session

#### 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

4/5/2024

Yes.

## Agency Response

### 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

4/24/2024

Yes.

4/5/2024

No, it would be good to discuss the possibility of a change in government and how the project is preparing for this.

Please consider moving the Low rating under the "Environmental and Social" risk category to Moderate, in line with the ESS risk category which is already marked as Low. Doing so would be in line with the description of the "Environmental and Social" risk category in Annex B of the GEF Risk Appetite document (GEF/C.66/13) stating that: "The rating reported by project under this category is identical to the Overall Safeguards Risk rating provided at PIF, CEO Endorsement, MTR and TE stage."

## Agency Response

We included the possibility of a change in government under "political and governance" - in this project, this risk is very low as it uses CSOs in all levels of implementation/execution. Where there could be an impact would be in the participation of the Indigenous People Ministry in project governance, but in Funbio's experience, this impact is low; even in significant government changes, the projects Funbio implements or executes didn't have much problem with this if you have a clear governance arrangement in place, which this project does.

We changed the rating from ESS risk category to 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

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

4/5/2024

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

4/5/2024

Yes. However, if there are any specifically numbered or labeled sections of the NBSAP relevant to this project please articulate that.

Agency Response We included the link between the labeled parts of the NBSAP in the text.

**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

4/24/2024

Yes.

4/5/2024

No, while the targets are good, please provide a short explanation of the project's relationship to each.

Agency Response We included the link between the project subcomponents to the targets

**7 D. Policy Requirements**

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

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes.

Agency Response

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

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No.

Agency Response We uploaded the GAP

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

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No.

Agency Response We uploaded the SEP

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

Secretariat comment at CEO Endorsement Request  
4/5/2024

Yes, this is excellent.

Agency Response

**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  
4/5/2024

Yes.

Agency Response

**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request  
4/5/2024

Yes.

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

**SCCF A (SIDS)?**

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

**Focal Area Set Aside?**

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No.

a. No, the project rationale would benefit from some editing to better tell the story of the project. Specifically, it would be good to describe what PGTAs are, their grounding in law, and how they are developed to build the case for the project. It would also be good to make the connection to the wider concept of IP Life Plans which are used in a number of countries.

b. No. With the development of value chains, it would make sense that the private sector would be a partner. It is ok that there are not specifics at this point, but it would be good to make the connection.

c. N/A

Minor: A few times TIs are used instead of ILs.

Agency Response

a. We adjusted the text and expand on the PGTAs, which are similar to Life Plans. PGTAs are enshrined in our main indigenous policy and well disseminated in Brazil so we prefer to use it instead of life plans.

b. text was adjusted

Corrected the TIs for ILs

## **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

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

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

4/5/2024

Yes. As noted before, please document additional co-financing during implementation.

Agency Response Noted and included in the text

**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

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

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

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

4/5/2024

Yes. However, please work with the Portal team to make sure this uploads well.

Agency ResponseIt seems to have uploaded right this time

**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

4/5/2024

Yes.

Agency Response

**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

4/24/2024

Yes.

4/5/2024

No, (i) The level of detail is inadequate to assess the adequacy and reasonability for charging the different budget items to the main sources (project's components, M&E and PMC). Please ask the Agency to breakdown the following budget items: Goods, Vehicles, Contractual Services Company, Salary and Benefits/Staff costs, and travel.

(ii) Unspecified "other operating costs" can't be covered by GEF resources ? please ask the Agency to provide a detailed explanation to determine what this entails for us to determine whether this is an eligible expenditure.

### Agency Response

We revised the budget and broke down all the items.

We re-categorized "other operating costs" in better categories, mostly services from firms and this was broke down with the rest of the budget. The only remaining "other operating costs" is a cost share of IEB rent in the PMC.

#### **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

4/24/2024

Yes.

4/5/2024

No, overall the project design is sound but the narrative needs some refinement.

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

Secretariat comment at CEO Endorsement Request

**9.3 Review Dates**

	<b>CEO Approval</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>		
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		

**PIF  
CEO**

**1. General Project Information**

**a) Is the Project Information table correctly filled, including specifying adequate executing partners? b) Are the project tags properly selected, i.e. any tag on 'support to IPLCs' or KMGBF target is justified given the project description.**

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes.



Agency Response

**c) Are the Rio Markers for CCM, CCA, BD and LD correctly selected with corresponding CCM, CCA, BD and LD benefits made explicit in the project objective, log-frame and/or theory of change?**

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No. Please add a specific paragraph to justify the importance of this project for CCA. There is a strong case to be made for how this can support CCA for vulnerable populations, but it needs to be explicit in the text.

Agency Response We added the importance of the project for CCA in the project rationale session.

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Secretariat comment at CEO Endorsement Request

4/24/2024

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4/5/2024

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Minor: Add people at the end of the last sentence.

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**c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?**

**d) For multi-Trust Fund projects with GEFTF financing, are the GEFTFT Project Financing and Co-Financing contributions to PMC proportional?**

**e) Is the PMC equal to or below 10% (for projects with GEF project financing less than or equal to \$2 million) or 5% (for projects above \$2 million)? If above, is the justification acceptable?**

Secretariat comment at CEO Endorsement Request

4/24/2024

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4/5/2024

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c. text was adjusted to ensure coherence and GAP was uploaded

#### Project Outline

##### 4. CHANGES COMPARED to PPG REQUEST

4.1 Are changes to the project design, including to elements put forward in the PPG request to meet GBFF selection criteria, been described and justified. And are they acceptable?

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes.

#### Agency Response

##### 5 B. 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 other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?

**c) If this is a blended finance project under GBFF Action Area 4, is there a description of how the project and its financial structure are addressing financial barriers?**

Secretariat comment at CEO Endorsement Request

4/24/2024

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4/5/2024

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a. No, the project rationale would benefit from some editing to better tell the story of the project. Specifically, it would be good to describe what PGTAs are, their grounding in law, and how they are developed to build the case for the project. It would also be good to make the connection to the wider concept of IP Life Plans which are used in a number of countries.

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- k) Policy Coherence: Have any policies, regulations, or subsidies been identified that could counteract the intended project outcomes? How will that be addressed?**
- l) Transformation and/or innovation: Is the project going to be transformative or innovative? Are the specific levers of transformation identified and described? Does it explain scaling up opportunities?**
- m) For blended finance project only, is the financial structure adequately explained?**

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No.

a. No, please revise language based on the other edits offered here. Please include assumptions.

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Secretariat comment at CEO Endorsement Request

4/24/2024

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Yes.

c. (i) The definition of how investment mobilized was identified is confusing as it refers to *ongoing projects that are being considered for co-finance include some that will start in the following months?*, in which case the type of co-financing should be *public investment?*. Additionally, it also says that *An estimate of the co-finance of recurring costs by governmental agencies will also be calculated?* but these calculations should have been done at CEO Endorsement ? please ask the Agency to amend.

(ii) Please include *Type of co-financing?* for the GIZ ? also, please include the English version of letter.

During inception and throughout the project, please document this for co-financing and within PIRs. There are numerous initiatives from NGOs and donors to support these territories that could likely be counted as co-financing and work together.

#### Agency Response

c. Corrected the text and include the type of cofinance for the GIZ.

We uploaded a translation of the letter

We also believe there will be more co-finance in the future, this will be monitored and reported - we include this in the co-finance session

#### **6.3 GEF Core indicators and GBFF indicators**

- a) Are the identified GBFF and relevant GEF 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 GBFF indicators, relevant GEF core indicators, and additional listed outcome indicators) reasonable and achievable?**

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes.

#### Agency Response

#### **6.4 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

4/24/2024

Yes.

4/5/2024

No, it would be good to discuss the possibility of a change in government and how the project is preparing for this.

Please consider moving the Low rating under the "Environmental and Social" risk category to Moderate, in line with the ESS risk category which is already marked as Low. Doing so would be in line with the description of the "Environmental and Social" risk category in Annex B of the GEF Risk Appetite document (GEF/C.66/13) stating that: "The rating reported by project under this category is identical to the Overall Safeguards Risk rating provided at PIF, CEO Endorsement, MTR and TE stage."

#### Agency Response

We included the possibility of a change in government under "political and governance" - in this project, this risk is very low as it uses CSOs in all levels of implementation/execution. Where there could be an impact would be in the participation of the Indigenous People Ministry in project governance, but in Funbio's experience, this impact is low; even in significant government changes, the projects Funbio implements or executes didn't have much problem with this if you have a clear governance arrangement in place, which this project does.

We changed the rating from ESS risk category to moderate.

#### **7 C. Alignment with Programming Strategies, Country/Regional Priorities**

**7.1 a) Is the project adequately aligned with the GBFF Action Areas and, for MTF projects, with Focal Area objectives?**

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes.

#### Agency Response

**7.2 Is the project aligned with the National Biodiversity Strategies and Action Plans, National Biodiversity Finance Plans, and/or similar instruments to identify national and/or regional priorities. For MTF projects, is the project aligned with other relevant country and regional priorities, policies, strategies and plans (including those related to the MEAs and relevant sectors)?**



Secretariat comment at CEO Endorsement Request

4/5/2024

Yes. However, if there are any specifically numbered or labeled sections of the NBSAP relevant to this project please articulate that.

Agency Response We included the link between the labeled parts of the NBSAP in the text.

**7.3 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

4/24/2024

Yes.

4/5/2024

No, while the targets are good, please provide a short explanation of the project's relationship to each.

Agency Response We included the link between the project subcomponents to the targets

**8 D. Policy Requirements**

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

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes.

Agency Response

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

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No.

Agency Response We uploaded the GAP

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

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No.

Agency Response We uploaded the SEP

**8.4 IPLCs:**

- a) Has the amount of GBFF project financing to support actions by IPLCs been sufficiently justified and have changes compared to PPG request stage, if any, been adequately justified?**
- b) If applicable, does Section C 'Project Description' describe the IPLCs who will benefit from the project and detail their role in the project? Have appropriate project tags related to IPLCs been selected?**

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes, this is excellent.

Agency Response

**9 Annexes**

**Annex A: Financing Tables**

**9.1 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?**

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes.

Agency Response

**9.2 Source of Funds**

**If using GEFTF resources, 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

4/5/2024

Yes.

Agency Response

**9.3 Confirmed co-financing for the project, by name and type:**

**Noting GBFF does not require but encourages co-financing, 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

4/5/2024

Yes. As noted before, please document additional co-financing during implementation.

Agency Response

Noted and included in the text

**Annex C: Project Results Framework**

**9.4 a) Have the GBFF indicators and relevant GEF core indicators been included?**

**b) Have SMART indicators been used; are means of verification well thought out; are the targets appropriate for the 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

4/5/2024

Yes. However, please work with the Portal team to make sure this uploads well.

Agency Response

It seems to have uploaded right this time

**Annex D: Status of utilization of PPG**

**9.5 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

4/5/2024

Yes - none requested.

**Agency Response**

**Annex E: Project map and coordinates**

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

Secretariat comment at CEO Endorsement Request

4/5/2024

Yes.

**Agency Response**

**Annex F: Environmental and Social Safeguards Documentation and Rating**

**9.7 Have the relevant safeguard documents been uploaded to the GEF Portal? Has the safeguards rating been provided and filled out in the ER field below the risk table?**

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No, we note that FUNBIO attached the Environmental and Social Safeguards Scree and rating and ESS questionnaires, and the overall ESS risk of the program is classified as moderate. The only minor comment is that the environmental and social section of the Key Risks table in the Portal said low risk. 1) Please make these risks consistent and revise.

**Agency Response**We adjusted the risk to moderate

**Annex G: GEF Budget template**

**9.8 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

4/24/2024

Yes.

4/5/2024

No, (i) The level of detail is inadequate to assess the adequacy and reasonability for charging the different budget items to the main sources (project's components, M&E and PMC). Please ask the Agency to breakdown the following budget items: Goods, Vehicles, Contractual Services Company, Salary and Befits/Staff costs, and travel.

(ii) Unspecified "other operating costs" can't be covered by GEF resources ? please ask the Agency to provide a detailed explanation to determine what this entails for us to determine whether this is an eligible expenditure.

**Agency Response**

We revised the budget and broke down all the items.

We re-categorized "other operating costs" in better categories, mostly services from firms and this was broke down with the rest of the budget. The only remaining "other operating costs" is a cost share of IEB rent in the PMC.

**Annex H: Blended Finance Relevant Annexes**

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

Secretariat comment at CEO Endorsement RequestN/A

**Agency Response**

**Additional Annexes**

**10. GEFSEC DECISION**

**10.1 GEFSEC Recommendation**

**Is the project recommended for approval?**

Secretariat comment at CEO Endorsement Request

4/24/2024

Yes.

4/5/2024

No, overall the project design is sound but the narrative needs some refinement.

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

Secretariat comment at CEO Endorsement Request

**10.3 Review Dates**

**CEO  
Approval**

**Response to Secretariat  
comments**

<b>First Review</b>
<b>Additional Review (as necessary)</b>
<b>Additional Review (as necessary)</b>
<b>Additional Review (as necessary)</b>
<b>Additional Review (as necessary)</b>