

Enabling blue economy growth in Tonga

Review PIF and Make a recommendation

Basic project information

GEF ID
12256
Countries
Tonga
Project Name
Enabling blue economy growth in Tonga
Agencies
UNDP
Date received by PM
1/5/2026
Review completed by PM

Program Manager
Celine Augereau ep Coisy
Focal Area
Biodiversity
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

04/27/2026

a) Cleared.

04/09/2026

a) Not cleared.

The project is aligned with:

- Objective 1 ? Conservation, Sustainable Use and Restoration (restoration of 500 ha of coastal and marine ecosystems) and the 30,000 ha of marine habitat under improved management through Locally Managed Marine Areas (LMMAs) directly respond to GEF-8's strategy through an integrated landscape/seascape management.

- Objective 3 ? Mobilization of Domestic Resources through the Component 3. The project estimates mobilizing approximately USD 500,000 annually in domestic resources for NbS.

Please also consider clarify the narrative: as the project is strictly programming BD fundings, blue carbon is supposed to result as a co-benefit that supports the Biodiversity rationale (ecosystem health, coastal protection, species habitat). As currently written, the carbon language is creating confusion and undermine credibility of a BD project. Revise also consistently targets of the CI.

For CI, see comments below.

The justification for Globally significance Biodiversity needs to be provided at PIF stage.

02/09/2026

a) The project needs to be precise in its objectives to better assess its alignment with BD or CC FAs.

Currently, it can be aligned with BD FA Objective 1: Biodiversity mainstreaming in Priority sectors, through Nature Capital Accounting. But the activities does not shows clearly how the results of studies of valuation done in Component 2 will be used in Component 1 for spatial land/and sea-use planning of coastal areas, how this will improve practices in Blue economy, or favorize the policy coherence (Outcome 1.1) to protect natural areas and species. Sectoral plans and policies are designed but please consider improving the project developing on how elements of component 2 will help develop the planification respectful of globally important ecosystems and that the planification will lead in an operational way to protected areas or new rules of management, and lead to remove bad subsidies for BD.

Indeed, GEF 8 emphasizes in integrated landscape and seascape management approaches across mixed-use mosaics that combine protected areas, sustainable use zones and productions sectors. The current project focused on coastal and marine areas does not clearly explain the connections this integrated approach between the different areas through a single spatial planning with quantified outcomes for biodiversity.

Please consider contributing to CI 1 and 2, or CI 4, which are core indicators relevant to follow outcomes to BD (GEBs).

Please also demonstrate that the blue carbon ecosystems targeted by the project are globally significant to justify GEF mandate. Blue carbon and carbon sequestration assessment are not funded per se by BD FA.

The project could also aligned with Objective 3: To increase mobilization of domestic resources for biodiversity.

b) Cleared.

Agency's Comments

27 April 2026:

a) Thank you for the comment, which is well noted, as the frequently used wording blue carbon ecosystems instead of the more appropriate term coastal-marine ecosystems might be misleading. As a consequence, this change in wording has been done throughout the document, hereby strengthening the Biodiversity narrative and underlining that climate change mitigation and climate change adaptation are co-benefits that support the project's Biodiversity rationale. This clarification has also been reflected in the project's theory of change diagram (page 21)

Furthermore, a table (pages 9-10) was included highlighting species of globally important biodiversity found in the three project-related ecosystems (i.e. mangrove forest, seagrass meadows, and coral reefs), which themselves are of global importance.

With regard to the Core Indicators, the current set of indicators was maintained, but these will be revisited during the PPG phase. In this connection, it should be noted that since the project is to work in the marine side of the coastal-marine area it would not engage in activities that support the biodiversity-related GEF Core Indicators 1 and 4, which both focus on terrestrial land areas.

The project will also focus its intervention on improving management of Special Management Areas (SMAs)/Locally Managed Marine Areas (LMMAs) and will thus support the biodiversity-related GEF Core Indicator 5, by working with local communities in 30,000 ha of SMA/LMMA. Due to the small size of the project, it is not anticipated that the project will be working within established Marine Protected Areas (i.e. Core Indicator 2)

23 March 2026:

- The project has been updated to better align with BD FA Objective 1: Biodiversity mainstreaming in Priority sectors, through Nature Capital Accounting. In particular, Component 2 has been strengthened to indicate how results of studies of natural valuation using SEEA's Ecosystem Accounting approach, a spatial approach to ecosystem accounting that enables the presentation of data and indicators of the level and value of ecosystem extent, ecosystem condition, and ecosystem services in both physical and monetary terms in a spatially explicit way. SEEA's Ecosystem Accounting will support spatial land/and sea-use planning of coastal areas, improve practices in blue economy, and favorize policy coherence (Component 1) (Please refer to the Indicative Project Overview pages 3-7 and Project Description pages 13-16)
- Component 1 has been updated to indicate that the project will revise and update Tonga's Marine Spatial Plan (MSP), which was initially adopted in 2020 with the aim of ensuring the sustainable, economic, and ecological management of Tonga's EEZ, including the expansion of the network of marine protected areas. The MSP needs to be updated in line with Tonga's recent international commitments for marine protection and management and the recently approved Ocean Management Act 2025. This will include new designations for marine management, sustainable use, and habitat protection particularly for deep-sea areas, and the support of community-led Special Management Areas (both coastal and marine). new designations for marine management, sustainable use, and habitat protection particularly for deep-sea areas, and the support of community-led Special Management Areas (SMAs). The update of the MSP responds to GEF 8 emphasis on integrated landscape and seascape management approach. (Please refer to the Indicative Project Pages 3-7 Overview and Project Description pages 13-16)
- Contribution to CI 1 and 2, or CI 4

- While the project, in its final stage, is expected to contribute to a combination of GEF Core Indicators related to the improved management of these areas, the exact sizes of these areas could not be determined during the PIF stage. The identification of the relevant project areas in which the project will operate during implementation is a key task during the Project Preparation Grant (PPG) phase
- The global biodiversity significance has been further emphasized in the text (paragraph 2 of the PIF) and the Blue carbon and carbon sequestration assessments have been removed from the project for better alignment with the BD FA.
- Information on the global significance of the blue carbon ecosystems targeted by the project to justify GEF mandate has been included. For details, please refer to answers to comments provided in Section 4.1. Situation Analysis of this response matrix.
- As suggested, the project will also be aligned with Objective 3: To increase mobilization of domestic resources for biodiversity. This is now mentioned in Section C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities (page 26)

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

02/09/2026

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

04/09/2026

b) Cleared.

02/09/2026

a) Cleared

b) Not cleared. See comments above. Revise articulation between components 2 and 1 explaining how nature accounting will help develop respectful planification and lead to protection of sensitive ecosystems and new management rules and use practices of natural areas.

Agency's Comments

23 March 2026:

b) As mentioned above, Component 2 has been strengthened to indicate how results of studies of natural valuation using SEEA's Ecosystem Accounting approach will support decision-making in Component 1 to support coastal and marine planning (updating of the MSP) and blue economy development for the protection and sustainable management of Tonga's biodiversity. This nature accounting approach includes a spatial assessment to enable accounting by the presentation of data and indicators of the level and value of ecosystem extent, ecosystem condition, and ecosystem services in both physical and monetary terms in a spatially explicit way. (Please refer to the Indicative Project Overview pages 3-7 and Project Description pages 13-16)

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

Secretariat's Comments

02/09/2026

Cleared.

Agency's Comments

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

04/08/2026

b) Cleared.

02/09/2026

a) Cleared.

b) Not cleared. Please correct. Currently GEF's contribution is 10% while Co-financing is 5%. Co-financing resources allocated to PMC, are not proportional to GEF resources allocated to PMC - for a co-financing of \$9,329,205, the 10% should be \$932,920, instead of \$466,460, which represents 4.99%. Please amend (please note that projects up to \$2 million can have PMC of 10%).

	Sub Total (\$)	1,531,964.00	9,329,205.00
Project Management Cost (PMC)			
	GET	153,196.00	466,460.00
	Sub Total(\$)	153,196.00	466,460.00
	Total Project Cost(\$)	1,685,160.00	9,795,665.00

c) Not cleared. Currently it is 5.4 %. Please revise.

Agency's Comments

23 March 2026:

b) The co-financing contribution to PMC was increased to \$932,920 as suggested so that is proportional to the GEF contribution of 10% (Please refer to the Indicative Project Overview pages 3-7)

c) The PMC was revised and is below 10% of the total GEF Grant, which is line with the GEF policy for MSPs

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

04/27/2026

a) Cleared.

04/09/2026

a) Not cleared (harmful subsidies). Please elaborate on fisheries sector, agricultural subsidies, deep-sea mining or extractive activities, and renewable energy development, tourism... because the PIF document acknowledges that current sectoral policies in energy, mining, and tourism are not aligned with blue economy or biodiversity goals.

02/09/2026

a) Not cleared.

- Please complete describe the global significance of the ecosystems targeted by the project.

- Complete description of policy framework identifying harmful subsidies for BD and policy inconsistency.

b) Cleared.

Agency's Comments

27 April 2026:

a) As suggested, information related to harmful subsidies for the fisheries, agriculture, deep-sea mining, and renewable energy has been included. Please refer to paragraph 5, page 10.

23 March 2026:

a)

•The project's physical intervention areas and the sizes of these areas could not be determined during the PIF stage, and their identification and the description of their global significance will be an important part of the Project Preparation Grant (PPG) phase and will be clearly outlined in a dedicated project annex. The ecosystems targeted by the project include coral reefs that are globally significant for their high biodiversity, their role in carbon cycling, and as a natural barrier protecting coastal communities. Seagrasses and coastal lagoons are globally significant as they serve important functions as spawning and feeding areas for many species as well as for carbon storage. Tonga's mangroves are globally significant as carbon storage, for the protection of vulnerable island coastlines from flooding and erosion, and serve as vital habitat for biodiversity such as fish, crustacean, and local and migratory bird species; mangroves also serve as a food source and support local fisheries. In addition, the project includes open ocean waters that serve as migratory pathways for humpback whales, a keystone species and of economic importance through ecotourism; in addition, open ocean waters are globally important for carbon sequestration. Due to its vulnerability, Tonga's coastal waters are essential for studying climate change impacts like sea-level rise. The ecosystems covered by the project are part of the Polynesia-Micronesia biodiversity hotspot. (Please refer to the Project Description)

•As noted in the PIF No country policies that might contradict with intended outcomes of the project have been identified at the time of PIF submission (paragraph 59 page 27). However, the point is well taken and, during the PPG phase, the project will undertake a review and analysis related to Harmful subsidies for BD and policy inconsistency within the project's area of intervention

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

04/09/2026

b) Cleared.

d) Cleared.

02/09/2026

a) Cleared.

b) The Tonga project includes several features that build resilience (scenario analysis, nature-based solutions, governance strengthening, adaptive M&E and knowledge management). However, it could be improved by a better structured sustainable financial mechanism, and enabling policies (see comments above).

c) Cleared.

d) Please, list and name the specific civil society organizations, indigenous peoples and local communities consulted during project design.

Agency's Comments

23 March 2026:

b) To better structure a sustainable financial mechanism, Component 3 has been updated by including the operationalization of Tonga's Ocean Trust Fund, which will allow the mobilization of new resources and the financial sustainability of NbS and Tonga's blue economy. The Ocean Trust Fund was designed to support ocean protection and management, and will allow investing in sustainable industries such as ecotourism, ocean renewable energy, and aquaculture. It is a financial mechanism anchored within Tonga's National Ocean Policy and the 2050 Strategy for the Blue Pacific Continent. (Please refer to Indicative Project Overview page 6 and the Project Description page 16)

d) The specific civil society organizations, indigenous peoples and local organizations consulted are: Tonga National Youth Council (TNYC), Langafonua 'a Fafine Tonga (Women representatives), the National CSO council, and the Coastal Green CSO (a science based CSO). (Please refer to D. Policy Requirements/Stakeholders pages 28-29)

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

04/27/2026

b) Cleared.

04/09/2026

b) Not cleared. See comment on 1st box.

The project is programming fundings only on Biodiversity FA. The justification of the narrative related to carbon sequestration is not needed even with fundings coming from Climate change FA due to full flexibility. The project is claiming currently climate mitigation results through its core indicator while being funded entirely as a Biodiversity project.

The programming directions can recognize blue carbon as a co-benefit of coastal ecosystem restoration under the Biodiversity focal area. But, from BD perspective, the programming directions are focused on conservation of globally significant biodiversity, through seascape or landscape approaches, restoration that improve the status of the biodiversity or resource mobilization.

Please consider improving the narrative by lightening references to carbon sequestration and by staying focused on the main purpose of that project, conservation or improvement of the status

of the globally significant biodiversity, Natural Capital Assessment and Accounting (NCAA), and resource mobilization.

02/06/2026

a) Cleared

b) Not cleared

- See comments above on alignment and GEBs and revise the project and ToC consistently.

- Component 2: Precise the type of valuation is expected.

- Component 3: The outcomes for are not sufficiently described and are not efficient to assess the financial sustainability of the proposition. Please also precise what type of PES structuring you are thinking of, regarding blue carbon ecosystems (e.g. what type of instrument, who would be the buyer and who would be the providers, and if any policy related work would be needed to address any institutional constraints for deployment).

Agency's Comments

27 April 2026:

b)

As mentioned in the response, changes to the project narrative have been made to strengthen the Biodiversity narrative and underline that climate change mitigation and climate change adaptation are co-benefits that support the project's Biodiversity rationale.

The revised narrative thus supports that the restoration of coastal-marine ecosystems will be for the purpose of improving the status of the associated biodiversity, and that the carbon sequestration, due to carbon stocks built, will occur as a co-benefit resulting from the restoration efforts.

Although limited in scope, Core Indicator 6 has been maintained, as the project is expected to obtain 39,283 tCO₂e Greenhouse Gas Emissions Mitigated from the restoration of 150 ha of Mangrove Forest and Seagrass Meadows, respectively. In this regard, however, it has been noted throughout the document that this is seen as a co-benefit.

23 March 2026:

b)

- The ToC has been updated consistently based on the information on project alignment with GEF FA Objectives (BD FA) and delivery of GEBs. (Please refer to the Project Description page 19)

- Component 2: It is expected that the project will use an ecosystem accounting approach based on the United Nations System of Environmental-Economic Accounting (SEEA; <https://seea.un.org/ecosystem-accounting>); it is a spatial approach to enable accounting that enables the presentation of data and indicators of the level and value of ecosystem extent, ecosystem condition, and ecosystem services in both physical and monetary terms in a spatially explicit way. Biophysical assessments will contribute to spatial planning while monetary estimates will provide information for decision-makers for blue economy policy

development (Component 1) and for raising local awareness of the importance of coastal and marine ecosystems. The use of this approach to ecosystem valuation will be further developed during the PPG. (Please refer to Indicative Project Overview pages 3-7 and the Project Description pages 13-16)

•Component 3 has been updated by including the operationalization of Tonga Ocean Trust Fund, which will allow the mobilization of new resources and the financial sustainability of NbS and Tonga's blue economy, and that was developed to support ocean protection, management, and sustainability efforts. Please note that the use of PES as a financial mechanism to support the implementation of Tonga's Blue Economy has been removed from the project due to the uncertainty on how this mechanism would operate and its potential to generate financial resources. The use of other mechanisms will be explored during the PPG phase including a conservation trust fund and debt-for-nature swaps, among other financing source and instruments. (Please refer to Indicative Project Overview page 6 and the Project Description page 16)

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

02/09/2026

Cleared.

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

04/27/2026

a) Cleared.

04/10/2026

a) The comment has not been addressed:

Please answer the question in the portal:

Coordination and Cooperation with Ongoing Initiatives and Project.

Does the GEF Agency expect to play an execution role on this project?

d) Cleared.

02/09/2026

a) Not cleared. Please propose a diagram of governance and execution of the project describing the different stakeholders and roles of the different instances.

Please answer the question in the portal:

Coordination and Cooperation with Ongoing Initiatives and Project.

Does the GEF Agency expect to play an execution role on this project?

b) NA: The executing agency is the government.

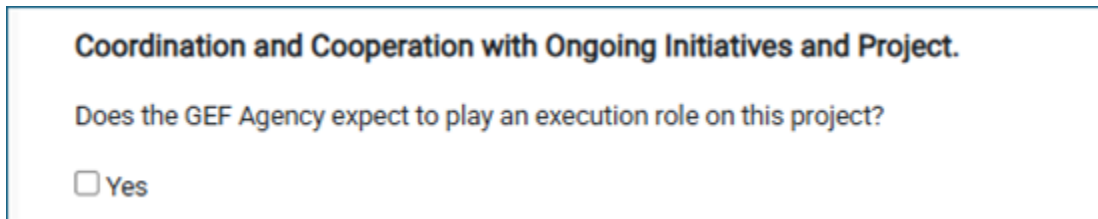
c) Cleared. A few elements appear to be aligned with the GEF-8 BGI IP. Please consider contact the countries involved in the process to benefit from their experiences.

d) Not cleared. Please precise how the project will work with Universities and research institutions to capitalize the knowledge and data. Precise how the education ministry will be involved to use data provided in scholar curriculum.

Agency's Comments

27 April 2026:

a) Thank you for the comment. The GEF agency does not expect to play an execution role. But while the PIF template does have both a YES and NO box that can be 'ticked?', the GEF Portal only shows a YES box (please see the screenshot below). It is, therefore, unfortunately, not possible to answer no in the GEF Portal as requested.



The screenshot shows a question box with the following text: "Coordination and Cooperation with Ongoing Initiatives and Project." followed by "Does the GEF Agency expect to play an execution role on this project?". Below the question is a checkbox labeled "Yes".

23 March 2026:

a) A diagram of governance and execution of the project is included and the roles of the different stakeholders involved are described. The full project governance and management arrangements will be defined during the PPG. (Please refer to Coordination and Cooperation with Ongoing Initiatives and Project pages 21-22)

c) During the PPG phase, the project will contact the different countries participating in the GEF-8 BGI IP (GEF Project ID 11250), which has as an objective to facilitate nature-positive development and reduce ecosystem degradation in SIDS by valuing nature and applying NbS with specific application to the food, tourism, and urban sectors. Countries in the Oceania region that are part of the GEF-8 BGI (i.e., Micronesia, Palau, Papua New Guinea, Samoa, and Vanuatu) and other participating countries will be contacted to learn from their experiences in the implementation of NbS and advancing blue economies and for the conservation of coastal and

marine biodiversity. The GEF-8 BGI IP (GEF Project ID 11250) is now mentioned in Coordination and Cooperation with Ongoing Initiatives and Project page 23

d) The project will work with research and universities such as the Tonga National University, the Vava'u Environmental Protection Association (VEPA), the Waitt Institute, and IUCN, which have experience in SMAs, marine spatial planning, and enhance coastal resilience and combat environmental threats through NbS (e.g., mangrove restoration and marine protected areas). During the PPG, the creation of a Technical Advisor Committee that will provide support to the MEIDECC and the Project Management Unit will be explored and which will allow for knowledge and data exchange to maximize project outcomes. (Please refer to Project Description pages 12-13)

It is anticipated that the data generated by the project will be shared with the Ministry of Education and Training (MET) as part of the knowledge management and learning strategy (Component 4). During the PPG, the project design team, in coordination with MEIDECC, will contact MET to establish how the data provided may be included in the scholar curriculum. (Please refer to Project Description page 12 and page 17)

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

04/27/2026

a) Cleared.

04/10/2026

a) Not cleared. See comments above on consistency related to alignment with BD focal area. Please consider tagging BD relevant core indicators, even if the areas targeted will be defined during the PPG phase. Revise CI6 to be consistent with results expected on BD CI (proportionality).

02/06/2026

a) Not cleared.

- See comments above on alignment with BD FA and revise CI to contribute to main CI related to BD At least, CI 1,2 and/or 4.

- Specify IPLC roles, rights, and benefit-sharing arrangements in decision-making (co-management models, customary tenure recognition), and refine CI 11 to measure tangible livelihood/benefit outcomes.

b) Idem

Agency's Comments

27 April 2026:

a) With regard to the Core Indicators, as mentioned above, the current set of indicators has been maintained, but these will be revisited during the PPG phase. As explained, the project will not be engaging in activities that support the biodiversity-related GEF Core Indicators 1

and 4, as the project will focus its interventions on the marine side of the coastal-marine areas. Furthermore, the project is not anticipated to work within established Marine Protected Areas (i.e. Core Indicator 2), as it will focus on improving management of Special Management Areas (SMAs)/Locally Managed Marine Areas (LMMAs) (i.e. the biodiversity-related GEF Core Indicator 5).

While the project, as noted, will be improving the management in 30,000 ha of SMA/LMMA, these areas are marine, and calculating the Greenhouse Gas Emissions Mitigation in marine areas is currently not feasible/possible, as it would be for terrestrial areas. This is why the project for Core Indicator 6 only includes the carbon co-benefits from the restoration of 150 ha of Mangrove Forest and Seagrass Meadows, respectively, as these can be calculated using the FAO ExAct Tool.

23 March 2026:

a)

- As mentioned above, while the project, in its final stage, is expected to contribute to a combination of GEF Core Indicators related to improving management of these areas, the sizes of these areas could not be determined during the PIF stage. The identification of the relevant project areas in which the project will operate during implementation is a key task during the Project Preparation Grant (PPG) phase

- IPLCs will have a key role in the governance and management decisions of the project through the participation of their representative in the Project Board (pages 21-22). Please also refer to the response to comments (above) regarding the governance and project execution structure. CI 11 has been updated to measure tangible livelihood/benefit outcomes. (Please refer to Project Description/Core indicators page 23)

- b) Confirming that the executing agency is the government (i.e., Ministry of Meteorology, Energy, Information, Disaster, Environment, Climate Change and Communications ? MEIDECC)

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

Secretariat's CommentsNA

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

04/10/2026

c) Cleared.

02/09/2026

a) Cleared.

b) Cleared.

c) Not cleared. The PIF references gender mainstreaming, stakeholder engagement, and livelihood pilots, but does not clearly articulate IPLC rights, governance roles, or benefit-sharing mechanisms in management decisions. As written, community engagement appears as consultation and training rather than a structured governance role typical of GEF-8's expectations.

Agency's Comments

23 March 2026:

c) IPLCs will have a key role in the governance and management decisions of the project through the participation of their representative in the Project Board (pages 21-22). Please refer above to the response to comments regarding the governance and project execution structure.

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

02/09/2026

a) Yes, cleared. See revisions to be done.

b) Yes, the project presents credible potential for innovation and scaling up, on Blue finance (PES, blue bonds/loans, equity instruments, and a trust fund aligned to the National Biodiversity Finance Plan), integrated NbS, governance reforms, digital data (digital and technological tools for blue carbon ecosystems mapping) ...even if this needs to be concretized during preparation.

c) Yes, cleared.

Agency's Comments N/A

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

04/10/2026

Cleared.

02/09/2026

See comments above on the alignment with BD FA. The project is not fully aligned and need to be revised.

Agency's Comments

23 March 2026:

- Please see the response above on alignment with the BD FA.

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

02/06/2026

Cleared.

Agency's Comments

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

04/10/2026

Cleared. It is well noted the possibility to reintroduce the target if creation of new protected areas is planned.

02/09/2026

Not cleared.

The project do not plan to protect new protected areas currently. Please remove Target 3 if the new version doesn't include new PAs.

Agency's Comments

27 April 2026:

The creation of new protected areas is not planned at this stage; thus, the related target has not been included.

23 March 2026:

Target 3 has been removed from the PIF, however, during the Project Preparation Grant phase, the project will reintroduce this target in case it identifies that new protected areas will be established as part of the project.

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

02/09/2026

Yes, cleared.

Agency's Comments

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

Secretariat's Comments

02/09/2026

Yes, cleared.

Agency's Comments

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

02/09/2026

Cleared.

Agency's Comments

Focal Area allocation?

Secretariat's Comments

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's Comments

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments

Agency's Comments

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

Secretariat's Comments

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments

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

02/09/2026

Yes, cleared.

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

02/09/2026

Cleared.

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

02/09/2026

Cleared.

Agency's Comments

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

Secretariat's Comments

02/09/2026

Cleared.

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

04/10/2026

Cleared.

02/09/2026

Not cleared. There is a small difference between the Lo and the portal. Please correct

Source of Funds	GEF Agency	Focal Area Source	Amount (in US\$)				
			GEF Project Financing	GEF Project Financing Agency Fee	Project Preparation Grant (PPG)	Project Preparation Grant (PPG) Agency Fee	Total
GEFTF	UNDP	CC STAR	1,507,371.31	143,200.27	42,857.00	4,071.42	1,697,500
GEFTF	UNDP	LD STAR	177,788.51	16,889.91	7,143.00	678.59	202,500
Total GEF Resources			1,685,159.82	160,090.18	50,000.00	4,750.00	1,900,000

GEF Financing Table

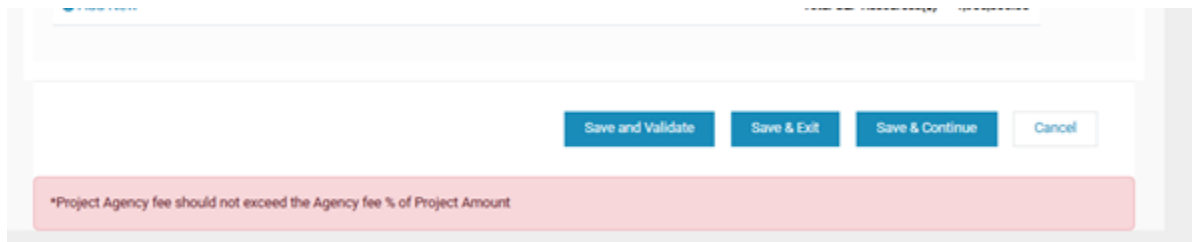
Indicative Trust Fund Resources Requested by Agency(ies), Country(ies), Focal Area and the Programming of Funds

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Programming of Funds	Grant / Non- Grant	GEF Project Grant(\$)	Agency Fee(\$)	Total GEF Financing (\$)
UNDP	GET	Tonga	Biodiversity	BD STAR Allocation: BD-1	Grant	1,685,160.00	160,090.00	1,845,250.00
Total GEF Resources (\$)						1,685,160.00	160,090.00	1,845,250.00

Agency's Comments

23 March 2026:

Thank you for the comment, the project has tried to make changes in the GEF Portal to address the issue raised, however, the Portal does not allow for making the changes that correspond to the LOE, as the following portal message is received ?Project Agency fee should not exceed the Agency fee% of the Project Amount?. Hence, no changes have been made in this connection.



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 CommentsNA

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

04/10/2026

Cleared

02/09/2026

Not cleared. Please provide a map with readable legend. Precise the different locations targeted by the project, and for ecosystems restoration and coral plantations.

Agency's Comments

23 March 2026:

A map with a readable legend has been included. The different locations targeted by the project, and for ecosystems restoration and coral plantations will be determined during the PPG phase and the map will be updated accordingly (Please refer to Annex C: Project Location page 32)

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

04/10/2026

- i) Cleared.
- ii) Cleared.
- iii) Cleared.

02/09/2026

Not cleared. We note that UNDP attached Social and Environmental Screening Template. An overall ESS risk is classified as Moderate.

- i. Please clarify vulnerable populations including small scale fishermen and women were consulted during development of project concept and how results of the consultations were integrated into the project concept (PIF).
- ii. Please ensure representatives of vulnerable populations will participate in the project as partners and will be part of governance mechanisms of the project.
- iii. Please consider integrating local knowledge and governance into the project design particularly Component 1 and 2.

Agency's Comments

23 March 2026:

i. A consultation workshop was held on 28 November 2025 and organized by the UNDP Pacific Office in partnership with MEIDECC with the aim of gathering feedback from representatives civil society organizations (CSOs), among other stakeholders, to refine the project design. Representatives from IPLCs (e.g., National CSO council), women (Langafonua 'a Fafine Tonga) and youth (Tonga National Youth Council- TNYC) organizations, were present. To ensure their suggestions were taken into account, the PIF was revised and updated so that the following were considered: training of local communities and village committees including access to financing, youth-led and women participation including NbS and tourism, mangrove, seagrass, and coral

restoration, creation of artificial reefs, and knowledge management. (Please refer to the Indicative Project Overview pages 3-7, the Project Description pages 15-16).

ii. Vulnerable populations (IPLCs, women and youth) will be represented in the Project Board. Please refer to the Coordination and Cooperation with Ongoing Initiatives and Project page 21 and 22. Please also refer to the Project Description and Annex D: Environmental and Social Safeguards Screen and Rating (page 36)

iii. As suggested, local knowledge and governance were integrated into the project design (Component 1 and 2) (Please refer to the Indicative Project Overview pages 3-7 and the Project Description pages 13-16)

Annex E: Rio Markers

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

Secretariat's Comments

04/27/2026

Cleared.

04/10/2026

Cleared. Sorry for misunderstanding, CCM could be tagged as significant (1) and BD Principal (2). (co-benefit)

02/09/2026

Not cleared. If the project is BD FA, please remove CC mitigation Rio marker.

Agency's Comments

27 April 2026:

CCM has been tagged as significant (1) (co-benefit) as suggested.

23 March 2026:

Since the project is aligned with BD FA, the CC mitigation Rio marker has been removed as suggested. (Please refer to Annex E: Rio Markers page 47)

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments

02/09/2026

Cleared.

Agency's Comments

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 CommentsNA

Agency's Comments

9 GEFSEC Decision

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

Secretariat's Comments

04/27/2026

The project is recommended for technical clearance.

04/10/2026

The project is not ready yet. Please address the comments.

02/09/2026

The project is not ready yet. Please address the comments.

Agency's Comments

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

Secretariat's Comments

- Please provide a map with readable legend. Precise the different locations targeted by the project, and for ecosystems restoration and coral plantations.

- Please ensure representatives of vulnerable populations will participate in the project as partners and will be part of governance mechanisms of the project.

- Please consider integrating local knowledge and governance into the project.
- 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 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 reflect gender equality and women's empowerment aspects in Component 3 (UNDP has guidelines and support for gender-responsive financing, including through its BIOFIN project). Under Component 4, please ensure that there are knowledge products on best practices in gender mainstreaming and empowering women, and that these are widely disseminated.

Agency's Comments

27 April 2026:

Thank you for your additional comments, which will be taken into account during the PPG phase and will be included in the CEO Endorsement/ Approval submission.

Review Dates

	PIF Review	Agency Response
First Review	2/9/2026	3/24/2026
Additional Review (as necessary)	4/10/2026	4/27/2026
Additional Review (as necessary)	4/28/2026	
Additional Review (as necessary)		
Additional Review (as necessary)		