

# Mainstreaming Climate-Resilient Blue Economy in the BCLME Region (BCLME IV Project)

Review PIF and Make a recommendation

## **Basic project information**

GEF ID

11282
Countries

Regional (Angola, Namibia, South Africa)
Project Name

Mainstreaming Climate-Resilient Blue Economy in the BCLME Region (BCLME IV Project)
Agencies

UNDP
Date received by PM

4/12/2023
Review completed by PM

5/3/2023
Program Manager

Leah Karrer

**Focal Area** 

Multi Focal Area

**Project Type** 

**FSP** 

## **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 (Karrer, May 16, 2023). Yes.

(PPO, May 2, 2023). No.

Please include participating countries (those with LoE) in the General Information Section of the PIF entry.

Agency's Comments

UNDP, 12 May 2023

The participating countries have been added in the General Information Section of the PIF entry in the GEF portal.

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 (Karrer, May 2, 2023). Yes.

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

(Karrer, May 16, 2023). Yes. During PPG please ensure the range of sectors of considered, including at the very beginning of the CER list the major sectors that will be addressed, which are not listed until page 19 of the PIF and are: fisheries, aquaculture/mariculture, coastal and marine tourism, mining, maritime transport, and blue carbon. The subsequent CER text needs to ensure all these sectors are considered. The PIF has a heavy emphasis on fisheries. The gender section as one example focuses largely on the role of women in fisheries without considering their role in tourism, aquaculture and blue carbon. As another example, the explanation of MSP references fisheries, mining and tourism activities but neglects to mention the other sectors (mariculture, shipping, blue carbon). Please be thorough and consistent.

During PPG the components need to further consider how the various sectors will be engaged in the project activities. Currently the PD in the PIF references fisheries, but not the other sectors. Outputs related to the various sectors need to be clear in the CER.

#### (Karrer, May 2, 2023)

- 1. Blue economy is listed as a key aspect of the program, yet the relevant sectors are not clear. Please provide a clear list of economic sectors and explanation of their activities that will be engaged. The context section (p12), noted, ?Unprecedented pressures from a combination of human activities (fishing, mariculture, oil and gas industries, mining, shipping, tourism, agriculture, etc.), natural environmental variability, and climate change are leading to degradation and loss of the BCLME?s marine habitats and associated biodiversity, reducing their resilience to climate change impacts?? and then ?Destructive human activities include emerging and proposed large-scale economic development, such as oil and gas exploration and production, marine phosphate mining, development of green hydrogen, exploration of new minerals and alternative living marine resources, marine bio-prospecting and industrial scale aquaculture (including alien species like salmon). These sectors need to be considered for inclusion and warrant at least a paragraph each explaining status, relevance to this project, and how they will be engaged.
- 2. Component 2, Output 2.1.1 and 2.1.2 include MPA and marine spatial planning, which requires addressing a range of activities. Please clarify what activities will be addressed. Please include plans to coordinate across components to ensure fisheries and oil/gas exploration are included in the MSP and MPA plans.
- 3. While water quality <u>monitoring</u> is noted in Output 2.3.1, actual management to reduce pollution is not included in the project plans. Addressing pollution needs to be included in

the project given the importance to ocean health. In fact marine pollution is discussed before climate change in the environmental problems section. At a minimum pollution warrants activities related to Component 2, but could be its own component given pollution is often as important as fisheries. Without actual pollution management efforts planned it is hard to justify pollution monitoring.

- 4. Component 3, Outcome 3.1 and Output 3.1.1 all indicate regional and national action plans; yet ensuring sustainable practices in the marine environment is the focus of Components 1 and 2. Component 2 includes ICZM and MSP, which is the means for balancing various marine activities? similar to what is described for the blue economy plans. Creating? blue/sustainable ocean economy strategy and national action plans? seems duplicative. The unique aspect of Component 3 is innovative financing. Can Output 3.1.1 be integrated into Component 2 and have Component 3 focus on the financing?
- Capacity building, including training, does not seem to be provided for the project other than related to fisheries. This is important for long-term sustainability and to scale activities.

## Agency's Comments

## UNDP, 12 May 2023

- 1. Additional text has been added under the project Rationale Section indicating the economic sectors that are engaged and in which way each of them is addressed in the proposed project. Also, the additional text has been added under the Theory of Change to provide more context for specific sectors.
- 2. Activities that will be addressed under Component 2, Output 2.1.1 and 2.1.2 have been described under the description of the components and under the project description section. The need to link the implementation of Components 1 and 2 has also been highlighted under project description section.
- 3. A separate component on pollution named component 3 has been added in the PIF. Also, this output that was under component 2 has been moved to component 3 as outcome 3.2.4: ?Water quality monitoring in pollution hotspots within the selected MPAs and coastal ecosystems (under 2.1) developed or enhanced to improve ecosystem health?
- 4. The proposed rearrangement has been done. Component 3 (now component 4) only addresses blue/ocean economy finance related activities.
- 5. Capacity building has now been included under all components.

#### UNDP, 17 May 2023

During PPG, we will ensure the components further consider how the various sectors will be engaged in the project activities.

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

Secretariat's Comments

(Karrer, May 16, 2023). Yes.

- 1. Gender information is incorporated; however, there tends to be a focus on fisheries and on engaging women in decision-making. During PPG please ensure consideration is given to the role of women in all the key sectors (i.e. fisheries, aquaculture, tourism, shipping, mining, blue carbon), including how they will be positively and negatively affected by project activities.
- 2. Addressed.

(Karrer & Lebale & Biro, May 2, 2023).

- 1. The gender section only references links to women in fisheries. Please consider the range of sectors, how women are engaged, what gender inequalities are observed, and how this project will incorporate gender issues and integrate gender-specific interventions in all of (or in relevant) project components, outputs and activities.
- 2. An overall approach to Knowledge Management and Learning has been provided in the Project Description. Proposal includes KM&L and capacity development deliverables that enable and enhance generation and access to knowledge and information through an esharing platform, training as well as dissemination of knowledge and communication products on lessons learned and best practice, in partnership with IW:Learn and other similar initiatives/ platforms. However, there is no reference to an overall Communication Strategy/Plan. Thus, the agency is requested to provide a *brief description of the project?s Communications Strategy/Plan* for outreach, awareness raising and dissemination of outputs/results. This should also be reflected in the project?s budget.

#### Agency's Comments

UNDP, 12 May 2023)

1. The gender mainstreaming has been added under all project components and a related paragraph under project description section has been enhanced to integrate these aspects.

2. Outcome 5.1 has been revised to include communication and this related specific output 5.1.3 has been added: ?Communication and Outreach Programme for awareness raising on Sustainable Blue/Ocean Economy approaches and opportunities developed and implemented?.

## UNDP, 17 May 2023

During the PPG, we will ensure consideration is given to the role of women in all the key sectors including how they will be positively and negatively affected by project activities.

- 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 (Karrer, May 2, 2023). Yes.

Agency's Comments

- **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 (Karrer, May 2, 2023). Yes.

Agency's Comments

## 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

(Karrer, May 16, 2023). Yes. During PPG please ensure all relevant stakeholders are engaged. In the PIF the private sector explanation does not mention fishers and related stakeholders (e.g. seafood sellers), aquaculturists, and blue carbon.

(Karrer, May 2, 2023). Regarding stakeholders, the stakeholder engagement section needs to clarify the organizations of the people listed. A full list of organizations needs to be provided that reflects the sectors to be address for the blue economy. During PPG meetings will need to be held with these groups and the Pro Doc will need to articulate why and how they will be engaged in the project.

#### Agency's Comments

## UNDP, 12 May 2023

The organizations of the people listed under the stakeholders table have been added with a full list of organizations reflecting the sectors to be addressed for blue economy. At the PPG phase, stakeholders will be engaged further, a stakeholder analysis will be undertaken, and a Stakeholder Engagement Plan developed. More information on why and how these stakeholders will be engaged in the project will be articulated in the prodoc.

## UNDP, 17 May 2023

During PPG, we will ensure all relevant stakeholders are engaged including the private sector in fisheries and related stakeholders, aquaculturists and blue carbon.

#### 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

(Karrer, May 16, 2023). Yes. The explanation is very helpful.

(Karrer, May 2, 2023). The theory of change diagram needs an overall explanation of how the barriers, outputs, outcomes, steps and impacts are related. Currently, there are separate explanations for the various boxes, but it?s not clear how these are related. Please add a narrative of the logic of the theory of change. I suggest consulting with STAP.

## Agency's Comments

## UNDP, 12 May 2023

The ToC diagram has been updated to include additional components and outputs. Additional text has been added after the diagram describing the Theory of Change depicted in the diagram.

#### 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 (Karrer, May 2, 2023). 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 (Karrer, May 16, 2023). Yes.

(PPO, May 2, 2023). No. Please include some information in section ?Coordination and Cooperation?, specifically by responding the question ?add a short explanation to describe cooperation with ongoing initiatives and projects, including potential for colocation and/or sharing of expertise/staffing? as relevant.

## Agency's Comments

UNDP, 12 May 2023

Requested information has been added in section? Coordination and Cooperation?.

- 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

(Karrer, May 17, 2023). Yes.

(Karrer, May 16, 2023). No. Please add #5 (marine improved habitat) and #7 (LME). Please note for improved marine habitat the total toarget for all GEF-8 projects is 70M ha so please ensure less than 10% of that amount and justify. The estimate of 17.6M ha of new MPAs is very high (the total target for GEF-8 is 100M ha) and lacking explanation. Please reconsider this ambitious amount and justify. The fisheries amount is also very ambitious at 1.2M metric tons (the total target for GEF-8 is 2.1M metric tons) and lacking explanation. Please also reconsider this amount and justify.

(Karrer, May 2, 2023). The core indicators reported are limited given the scope of the project. Only MPAs and # beneficiaries are noted. In the Excel document, #LMEs is noted, which needs to be added to the indicator list in the main text. In addition, the project will lead to improvements in fisheries as noted in the PIF (p24), ?specifically, the project activities will increase the number of commercially exploited stocks under improved management and on sustainability pathway, supporting the sustainable economic development of the fishing sector?. And the project will improve marine habitat health through MSP, ICZM, measures. It would, therefore, seem that indicators #5 (marine habitats under improved management practices) and #8 (fisheries moved to more sustainable levels) would be included as indicators.

#### Agency's Comments

#### UNDP, 12 May 2023

#LMEs has been added to the indicator list in the main text. Indicators #5 (marine habitats under improved management practices) and #8 (fisheries moved to more sustainable levels) have been included

#### UNDP, 17 May 2023

Indicator 5 (marine improved habitat) has been added and sub-indicators 7.1,7.2, 7.3, 7.4 have been added under Indicator 7 (LME). The target under indicator 2 (MPAs) has been reduced. The fisheries amount has been reduced to 50,000 metric tons. The justification for each indicator is provided under the methodological approach and underlying logic to justify target levels for Core and Sub-Indicators.

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

Secretariat's Comments NA

Agency's Comments

**5.6 RISKs** 

- a) Are climate risks and other main risks relevant to the project described and addressed within the project concept design?
- b) Are the key risks that might affect the project preparation and implementation phases identified and adequately rated?
- 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 (Karrer, May 2, 2023). Yes.

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 (Karrer, May 2, 2023). 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 (Karrer, May 2, 2023). Yes.

Agency's 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 (Karrer, May 2, 2023). Yes.

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

(Karrer, May 17, 2023). Yes.

(Karrer, May 16, 2023). No. There needs to be an explanation of how the project relates to the GBF targets. A table is suggested where the GBF targets are noted in the first column and for each the relevant project activities are noted in the next column.

(Karrer, May 2, 2023). No. Given the nature of the project, including related to marine biodiversity, please indicate how the project will contribute to the Global Biodiversity Fund objectives and targets.

#### Agency's Comments

## UNDP, 12 May 2023

A description of how the project would contribute to the Kunming-Montreal Global Biodiversity Framework Targets has been included, mentioning the main 2030 targets that the outputs contribute to.

## UNDP, 17 May 2023

An explanation of how the project relates to the GBF targets has been added using the table as suggested.

#### 7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments (Karrer, May 2, 2023). Yes.

## Agency's Comments

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

## Secretariat's Comments

(Karrer, May 16, 2023). Yes. During PPG please ensure the range of private, NGO, government, and other stakeholders are consulted related to the key sectors.

(Richardson, May 2, 2023). No. The project states that it has consulted IPLCs and civil society organizations in project design, it is however unclear from the list provided who these are. Please clarify further.

## Agency's Comments

## UNDP, 12 May 2023

The list of consulted IPLCs and civil society organizations has been added under the table of consulted stakeholders.

## UNDP, 17 May 2023

During PPG, we will ensure the range of private, NGO, government, and other stakeholders are consulted related to the key sectors.

#### 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

(Karrer, May 17, 2023). Yes. During PPG please ensure clear that Component 2 is still noted as only Namibia. The title in the Project Objective and then Project components section currently state "Improve marine... (only for Namibia)", which needs to be corrected for CER and ProDoc along with ensuring text is clear.

(Karrer, May 16, 2023). No. This focus of Component 2 only on Namibia is a substantial change from the previous version of the PIF. By only focusing on Namibia, the spatial planning will not occur in the other countries. There are 2 significant concerns with this change: 1) this change is not reflected in the text, which still in many places indicates that the activities will occur throughout BCLME, not just Namibia; and 2) more importantly, Component 2 MSP plans are important to all of BCLME, not just Namibia. They are especially important sense Component 1 has a heavy fisheries focus and Component 3 on pollution, so Component 2 is the means of addressing the range of sectors, including establishing MPAs. Please reconsider this plan to only focus on Namibia. I suggest you expand back to the region and have more funding (from their BD STAR) going to Nambibia for specific outputs (e.g. for MPA creation).

(Karrer, May 2, 2023). The financing includes \$1.7M from BD of Namibia. These funds are specifically for Namibia, which needs to be reflected in the PIF. Also please note in the project description, including in Table B, how this \$1.7M will be invested in Namibia.

Agency's Comments

UNDP, 12 May 2023

Component 2 is exclusively targeting Namibia, thus all activities described under this component will be implemented in this country. This has been reflected under the Indicative Project Overview table (under Component 2), a related note has been added between the Indicative Project Overview table and the project Outline, and related text has been added in the description of Component 2, under the project description section.

17 May 2023

Outcome 2.1 is now focusing on all three participating countries and only outcomes 2.2 and 2.3 on Namibia using the USD 1.7 million of Namibia STAR allocation.

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 (Karrer, May 2, 2023). 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 (Karrer, May 2, 2023). Yes. Agency's Comments **Annex B: Endorsements** 8.4 Has the project been endorsed by the country?s(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 (Karrer, May 2, 2023). Yes.

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

Agency's Comments

Secretariat's Comments (Karrer, May 2, 2023). 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 (Karrer, May 17, 2023). Yes.

(Karrer, May 16, 2023). No. The BD funding still shows as Global/Regional. Please correct to National.

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	Regional	International Waters	International Waters: IW-1	Grant	8,932,420.00	803,818.00	9,736,238.00
UNDP	GET	Regional	Biodiversity	BD Global/Regional Set-Aside	Grant	1,552,511.00	139,627.00	1,692,138.00
Total GEF Resources (\$)					10,484,931.00	943,445.00	11,428,376.00	

## **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 (\$)
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UNDP	GET	Regional	Biodiversity	BD Global/Regional Set-Aside	Grant	1,552,511.00	139,627.00	1,692,138.00
Total GEF Resources (\$)					10,484,931.00	943,445.00	11,428,376.00	

(PPO, May 2, 2023). No. The LoEs from South Africa, Angola, and Namibia all have slightly different project titles than in the PIF entry. Please edit for consistency (most likely easiest to edit the PIF than reissue LOEs).

The BD funding for Namibia is listed as "regional/global set-aside". This set aside is not available for this project. The BD funding has to come from the country's STAR allocation. Please revise the letter noting Namibia's STAR or remove this amount from the project.

## Agency's Comments

## UNDP, 12 May 2023.

1. The title in the PIF has been changed from ?Mainstreaming climate-resilient sustainable blue and/or ocean economy in the BCLME Region (BCLME IV Project)? to ?Mainstreaming Climate-Resilient Blue Economy in the BCLME Region (BCLME IV project)? that is the LoEs. No. The LoEs from South Africa, Angola, and Namibia all have slightly different project titles than in the PIF entry. Please edit for consistency (most likely easiest to edit the PIF than reissue LOEs).

2. This has been corrected in the GEF portal. The BD funding for Namibia is now listed as country? s STAR allocation not "regional/global set-aside". This set aside is not available for this project. The BD funding has to come from the country's STAR allocation. The submitted letter notes Namibia's STAR.

## UNDP, 17 May 2023

BD funding has now been changed to ?Namibia? in the Portal.

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 Comments NA

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 (Karrer, May 2, 2023). 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 (Karrer, May 2, 2023). Yes. Agency's Comments **Annex E: Rio Markers** 8.8 Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable? Secretariat's Comments (Karrer, May 2, 2023). Yes. Agency's Comments Annex F: Taxonomy Worksheet 8.9 Is the project properly tagged with the appropriate keywords?

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

Secretariat's Comments (Karrer, May 2, 2023). Yes.

Agency's Comments

**Annex G: NGI Relevant Annexes** 

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 NA

Agency's Comments

## 9 GEFSEC Decision

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

Secretariat's Comments (Karrer, May 2, 2023). No.

## Agency's Comments

UNDP, 12 May 2023

We hope the responses to the comments would help to move to the next step.

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

Secretariat's Comments

Agency's Comments

**Review Dates** 

5/5/2023
5/16/2023
5/17/2023

PIF Review

Agency Response