

Law Enforcement for Sustainable Viable Ecosystems and Biodiversity Resilience through Multi Sectors Engagement (LEVERAGE)

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID
11160
Countries
Indonesia
Project Name
Law Enforcement for Sustainable Viable Ecosystems and Biodiversity Resilience through Multi Sectors Engagement (LEVERAGE)
Agencies
UNDP
Date received by PM
5/9/2025
Review completed by PM
7/7/2025
Program Manager
Teayeon Kim
Focal Area
Multi Focal Area
Project Type
FSP

CEO

Part I - General Project Information

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

Secretariat comment at CEO Endorsement Request

HF May 2025

Yes

Agency Response

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

Secretariat comment at CEO Endorsement Request

HF July 1, 2025

Cleared.

HF May 2025

Based on the project goal, objectives and components Biodiversity should be the principal objective with CCM objective. Please revise accordingly.

Agency Response

30 June 2025

Noted. The Rio Markers have been revised as follows: Biodiversity (principal objective), CCM (significant objective), CCA (no contribution).

The core goal of the LEVERAGE project is to reduce biodiversity loss through improved law enforcement, protection of key species and habitats, and stronger governance. This is the project's main driver, as reflected in its outcomes (e.g., improved protected area management, reduced illegal wildlife trade, and biodiversity conservation financing).

Although not the primary focus, the project supports CCM by reducing ecosystem degradation and maintaining forest cover, which are critical carbon sinks.

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?

c) [If a child project under a program] Does the project summary include adequate and substantive link with the parent program goal and approach?

Secretariat comment at CEO Endorsement Request

HF July 1, 2025

Cleared.

HF May 2025

a.b.) Yes.

c.) No, please include a sentence substantively linking this project to the parent program, GWP GEF-8.

Agency Response

30 June 2025

c.) The summary has been updated, with a sentence indicating how this project is linked to the GEF-8 GWP.

3. Project Description Overview

a) Is the project objective statement concise, clear and measurable?

b) [If a child project under a program] Is there a project Theory of Change that is aligned and consistent with the overall program goal and approach?

c) 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?

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

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

f) 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

HF July 1, 2025

Cleared.

HF May 2025

a.) Please revise for clarity and simplicity. Current language (**To strengthen collaborative and integrated law enforcement with multi-level stakeholder engagement for protecting biodiversity loss by incorporating positive behavioral change toward wildlife conservation and human health both men and women**) also seems to state that the project objective is to protect biodiversity loss? Please correct and revise.

b.) Yes.

c.) The "indicators" included in the project description overview table are not indicators, but rather they are output targets. Redact and include clear indicators and targets in the results framework.

d-f.) Clear

Agency Response

30 June 2025

a) The proposed objective revision is as follows:

To reduce biodiversity loss and mitigate zoonotic risk by strengthening interagency law enforcement, fostering behavior change, and advancing inclusive conservation through multi-level stakeholder engagement.

c) The indicators and targets in the overview table have been updated, consistent with the project results framework.

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

HF May 2025

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) [If a child project under a program] Is the Theory of change aligned with and consistent with the overall program goal and approach?

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? [If a child project under a program] Does the description include how the alternative aligns with and contributes to the overall program goal and approach?

d) 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?

e) 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?

- f) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?**
- g) 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?**
- h) 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)?**
- i) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?**
- j) 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?**
- k) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?**
- l) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?**
- m) Transformation and/or innovation: Is the project going to be transformative or innovative? [If a child project under an integrated program] Are the specific levers of transformation identified and described? Does it explain scaling up opportunities?**

Secretariat comment at CEO Endorsement Request

HF July 1, 2025

Cleared.

HF May 2025

This CER is 174 pages long with nearly 40 annexes (plus a pro-doc). Please ensure each section of the CER adheres closely to the character limits. Please simplify and trim down throughout the CER. Please put non-essential information into additional annexes. A full review will be undertaken once the documentation is in line with the character limits and GEF-8 expectations for CEO endorsement requests.

a.) The graphic is blurry and ineligible. Please re-upload.

b.) Yes

c.) Please include explicit lessons learned from past and current investments in IWT in Indonesia given the long history of support to IWT by both GEF and other foreign bilateral donors and how this is incorporated into/built upon in this project.

d.i) Overall: This CER reflects a significant amount of work and thinking on the part of the design team. At the same time, the CER contains large number of significant activities, everything from creation of forensics lab to policy work, HWC, community livelihoods, regional enforcement operations, youth engagement, demand reduction and ranger training. It is unclear from both the (very generalized) budget and the CER design document whether this scope is overly ambitious for the time and financing available, and how this number of activities, many of them complex and long-term will be managed, executed and monitored simultaneously. Please focus and concentrate the design and budget to the extent possible (including use of co-finance for much of the scope), and clarify further the execution and approach to adaptive management to ensure results delivery and sustained impact.

d.ii) Component 1: Great to see inclusion of ranger code of conduct and safeguards. Is there any opportunity for policy to support ranger/eco-guard welfare?

d.iii) 1.3: Great to see these activities aimed at valuation, but it is not clear how the outputs of these activities will be used, what are the next steps or intended outcomes/results? They seem to

stop at completing the assessment, rather than being applied to mobilize sustainable financing. Please address. In addition, please address how BIOFIN Indonesia fits into this or how these align with the BFP.

Component 2:

d.iv) Output 2.3: Seems like a significant undertaking. Please provide further information such as: Is this for the establishment of a new "Forest Ranger Academy?" Or support to an existing institution? Is this governmental and where does the operating budget come from? Financial sustainability considerations? How will it use and build on all the past investment in law enforcement training and capacity building support for Indonesia? Please also contact the GWP global coordination project lead agency about the GWP support to core competencies for enforcement training. And possibilities for mainstreaming wildlife into training and capacity building of other sectors (e.g. the police academy, customs and boarder control, diplomatic core (demand reduction), degree programs etc)

d.v) Output 2.4: Great to see regional collaboration and operations. Please address how the project/this output will focus on the institutionalization of capacity building and training efforts rather than just training staff which is a short-term solution.

d.vi) Output 3.1: Important activities, but what measures or resources are there to ensure the financial sustainability of these critical PA management activities.

d.vii) Please simplify/clarify language of output 3.1.1.

d.ix) 3.1.3: Although incentivizing conservation action is a good practice in general terms, please be sure that these activities are not making access to basic community development benefits, particularly by women and other disadvantaged groups, contingent on conservation action as that seems unethical. May need reframing.

d.ix) 3.2.1 and 3.2.3: Please streamline to only include activities and outputs that directly contribute to the conservation goal of this project by addressing the drivers of wildlife loss. The use of co-financing for activities beyond this scope is encouraged-including from the Department of Health-given the essential public health nature of some of what is included in this project (e.g. supply of health officers, PPE, and other public health materials). GWP engagement should absolutely support collaboration across sectors (e.g. with health, Ag, transport companies) through a number of approaches including multistakeholder forums and coherent policy and practices, but GEF resources should only be used on activities/procurements that are within the mandate and focus of this project (e.g. GEBs) while crowding in engagement and resources from across sectors and institutions for adjacent and complimentary efforts and materials (e.g. basic public health supplies). Please review Component 3 with this lens.

d.x) 4.1 Please engage with the GWP global coordination project and with the other 37 participating GWP countries to ensure that this Component/activity is accessing the products and information already out there and avoids duplication of efforts or production of materials. It seems that many of the KM products listed likely have already been developed either by other projects or other countries on which this effort should directly benefit/derive materials.

i.) The Stakeholder engagement plan (SEP) provides a good overview of analyses and consultations with key stakeholders and planned project means of consultation and engagement in project implementation. Please better describe the role of the different stakeholders related to project components and outputs. In addition, please describe the role of civil society as ?Executor or co-executor? highlighted in the stakeholder engagement section in the portal.

j.i) Gender: The Agency is requested to incorporate gender perspectives in Output 1.1. and 2.1. (e.g. ensuring that women are included in decision-making processes and coordination

mechanisms). In Output 1.3, please reflect how gender inequalities with regard to women's access to and knowledge on financial access are going to be addressed.

j.ii) During project implementation, please ensure that the PIRs, the MTR and TE include gender-specific results and progress in the implementation of the Gender Action Plan.

m.) Sustainability: The section on Sustainability in the CER doesn't include or link the work on financial sustainability to the sustainability of impact of this investment. With the significant scope of this project and myriad activities the need for a solid plan and investment in financial sustainability is considerable. Please address.

Agency Response

30 June 2025

Excluding annexes, the CER is 57 pages in length in the Word version.

a) The theory of change graphic has been re-uploaded.

c) Building upon the lessons from previous projects outlined in the Project Rationale section, the following entry has been added to Section B of the CER (Project Description), under the "Barriers to Change and Drivers of Intervention Design" sub-section:

"These challenges were also identified in earlier GEF-5 and GEF-6 investments, including the CIWT and Tiger projects, which showed that SMART patrols, interagency collaboration, and behavior change efforts can reduce IWT pressures when integrated with community incentives. However, these efforts often lacked sustainable financing, clear legal mandates, or scalability across provinces. USAID's LESTARI project and INTERPOL partnerships helped improve data systems but struggled to secure long-term institutional buy-in. The LEVERAGE project applies these insights by strengthening enforcement financing, embedding culturally attuned behavior change, and formalizing coordination under national legislation."

d.i) We acknowledge this comment. The project design, as first formulated in the concept note, does indeed include a number of substantive interventions. The project strategy was conceptualized through a co-design process, involving governmental and non-governmental stakeholders. This GEF-8 project builds on results achieved in previous GWP and other projects in Indonesia focusing on IWT. The substantial co-financing contributions from key institutional partners, including the Ministry of Forestry (Directorate General of Law Enforcement on Forestry), Ministry of Finance (Directorate General of Customs and Excise), and the Indonesian Quarantine Agency (Deputy for Animal Quarantine) are integral to the successful implementation of the project and to help ensure results are sustained after GEF funding ceases.

d.ii) The following entry has been added to the narrative description of Output 1.1:

"Promote improved ranger welfare through measures such as safety protocols, mental health support, and access to grievance mechanisms, in alignment with the URSA Ranger 30x30 framework."

d.iii) The following entry has been added to the narrative description of Output 1.3:

The results of these valuation assessments will be used to inform national policy discussions on environmental fines, sanctions, and compensation frameworks. Specifically, findings will support legal proceedings under Indonesia's environmental liability regime, helping calibrate appropriate penalty structures for wildlife crime and ecosystem degradation. These efforts align with the Biodiversity Finance Plan (BFP) and will be coordinated with BIOFIN Indonesia, which provides upstream policy guidance on sustainable revenue generation for biodiversity conservation. LEVERAGE complements BIOFIN by applying valuation results in enforcement and judicial contexts to secure funding for ecosystem restoration.

The following entry has been added to the description of activity on "Policy Integration and Dissemination" under Output 1.3:

Support application of valuation results in policy instruments such as environmental fines, compensation claims, and judicial proceedings, building on precedents where valuation informed successful enforcement and restoration finance.

d.iv) The project will support the operationalization of the Forest Ranger Academy, an initiative established by the Directorate General of Law Enforcement on Forestry. This support will include capacity building, technology enhancement, and provision of necessary equipment. The following entry has been added under the narrative description of Output 2.3:

Training activities under Output 2.3 will be implemented through existing institutions, notably BP2SDM (Human Resources Development and Extension Agency under the Ministry of Forestry), which is the Government of Indonesia's primary entity for in-service training of protected area staff and enforcement officers. This approach builds on lessons from past GEF investments, including the CIWT project, and will ensure long-term sustainability by embedding updated modules into existing state-funded training curricula. The project will co-finance development of updated curricula on IWT, One Health, and gender-sensitive enforcement, and will consult with the GWP global coordination unit to align with core competencies and explore cross-sectoral training opportunities with agencies such as the National Police, Customs, and the diplomatic corps.

d.v) The following entry has been added to the narrative description of Output 2.4:

To ensure sustainability, capacity-building efforts under Output 2.4 will be institutionalized through BP2SDM, the Human Resources Development and Extension Agency under the Ministry of Forestry. Rather than offering ad hoc training sessions, the project will support the integration of updated content on IWT, transboundary collaboration, and biodiversity enforcement into BP2SDM's official training curriculum and certification framework. This will ensure that capacity-building extends beyond the life of the project, creating a pipeline of well-trained personnel across national and regional institutions. Outputs from LEVERAGE-supported training modules will also be shared with regional counterparts through the ASEAN-WEN platform to support harmonization of standards and peer learning across Southeast Asia.

d.vi) The following entry has been added to the narrative description of Output 3.1.1:

To promote the financial sustainability of these enhanced enforcement efforts, they will be embedded within the standard operating and budgeting frameworks of target site/protected area management authorities. The project will support institutional uptake of tools and practices through METT-aligned site management plans, with financial sustainability strategies, such as targeted fines, cost-sharing with local governments, and linkages to national budget allocations, explored in

collaboration with the Ministry of Forestry and BIOFIN Indonesia. Complementing legal reform efforts under Component 1, the project will strengthen legal and policy frameworks to ensure that financial penalties from major environmental cases, such as illegal land clearing or trafficking, can be directed toward conservation budgets and protected area operations. This creates a direct link between improved enforcement and long-term funding for biodiversity protection.

d.vii) The phrasing of Output 3.1.1 has been revised to the following:

Output 3.1.1. Enhanced law enforcement and catalytic site-level actions.

d.ix) The following entry has been added to the narrative description of Output 3.1.3: Incentives such as alternative livelihood pilots, ecotourism initiatives, and community benefits schemes under this project will not jeopardize or undermine any baseline economic conditions of community members, whether they choose to participate. These incentives are strictly additive and voluntary and will be implemented in ways that ensure equitable access, particularly for women, youth, and marginalized groups, in line with the project's Gender Action Plan and Stakeholder Engagement Plan.

d.ix) The following entries have been added to the narrative description of Component 3:

To ensure alignment with GEF programming directions, the project budget for Component 3 has been structured to channel GEF resources exclusively toward biodiversity-relevant interventions, such as wildlife pathogen surveillance, enforcement-linked zoonotic risk monitoring, and inter-agency coordination mechanisms. Public health expenditures, such as PPE procurement and frontline health service delivery, are financed solely through co-financing contributions from the Ministry of Health and other partners.

These conservation-focused efforts stabilize biodiversity and mitigate spillover risks by addressing ecological drivers of zoonotic disease transmission, such as wildlife trafficking, habitat degradation, and high-risk interfaces between people and wildlife. While the public health sector plays a complementary role in broader One Health implementation, GEF resources are strictly applied to biodiversity-relevant activities, including wildlife surveillance and ecosystem management.

To enhance institutional coordination, Component 3 will support the design and operationalization of an interagency data-sharing protocol between the Ministry of Forestry, the Ministry of Agriculture, and public health agencies.

The Capacity building and training activity under Output 3.2.1 has been updated with the following entry:

Incorporate training on the use of screening tools and other biosafety technologies relevant to enforcement personnel at wildlife-human interfaces. PPE provision and health safety equipment will be financed through co-financing contributions from the Ministry of Health and other partners.

The Equipment and facility support activity under Output 3.2.1 has been replaced with the following entry:

Ensure border points are equipped with wildlife screening and containment facilities such as infrared thermometers for basic wildlife health assessments and secure holding areas for confiscated animals. PPE and other frontline health protection resources will be provided through co-financing from the Ministry of Health and relevant agencies.

The 'Cross-sectoral dissemination' activity under Output 3.2.3 has been updated with the following entry:

'Any follow-up interventions with a broader public health or clinical focus will be supported exclusively through co-financing from the Ministry of Health and other non-GEF partners.'

The 'Training and capacity building' activity under Output 3.2.3 has been replaced with the following entry:

'Train institutional staff in using study methodologies and applying findings to improve biodiversity conservation enforcement and wildlife trade governance. Build local capacity to replicate wildlife-linked zoonotic spillover risks in other high-risk trade and habitat interfaces, creating a scalable model for biodiversity-centered zoonotic spillover prevention and conservation-oriented regulatory improvements.'

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d.x) The following entry has been added to the narrative description of Component 4:

'To avoid duplication and maximize value, the project will engage with the GWP global coordination project and peer countries to draw on existing knowledge products, tools, and frameworks already developed under the GWP umbrella.'

j.) The following entries have been added to the component narrative descriptions:

Component 1:

'The Ministry of Forestry will lead national-level regulatory reforms and coordination platforms under this component. Provincial Environmental Agencies and local governments will support subnational implementation and alignment. Qualified civil society organizations will serve as co-executors or implementation partners, providing technical input on regulatory reforms and facilitating multi-stakeholder engagement processes. These organizations will also help ensure that coordination platforms reflect local realities and social inclusion priorities, as detailed in the Stakeholder Engagement Plan. Academic institutions and research partners will contribute to ecological valuation studies and knowledge-sharing.'

Component 2:

'Component 2 engages institutions responsible for combating wildlife crime and ensuring that enforcement leads to tangible conservation and community benefits. The Ministry of Forestry, including the Directorate General of Law Enforcement (Gakkum), leads efforts to strengthen investigations, coordination, and case management. The National Police, Ministry of Justice and Human Rights, and the Attorney General's Office are engaged in evidence handling, cross-sectoral prosecutions, and enforcement oversight. The Financial Transaction Reports and Analysis Center (PPATK) is a key partner in supporting TPPU (money laundering) prosecutions and tracing illicit financial flows. Judicial actors and public prosecutors will help operationalize sentencing pathways that enable restitution payments.'

Restitution mechanisms are designed to channel fines and penalties from wildlife crime convictions into biodiversity conservation and community incentive initiatives. Administration of these benefits will involve trusted community institutions such as local government councils (e.g., *desa* or *kelurahan* councils), indigenous organizations, and civil society groups with a track record of

financial transparency and community representation. These groups will be supported in developing transparent guidelines to allocate restitution funds for conservation-linked priorities.

In parallel, the project works to improve regulation and monitoring of legal wildlife trade, particularly through enhanced inspection systems at ports, enforcement of CITES permits, and prevention of laundering wild-caught specimens through legal breeding operations. Relevant stakeholders include port authorities, quarantine officers, customs and excise officials, and registered wildlife breeders and traders.?

Component 3

?Under this component, local NGOs and community-based organizations will serve as frontline partners in mobilizing community patrols, supporting co management models, and designing conservation incentive schemes. Qualified civil society groups will lead behavior change campaigns and monitor community attitudes and practices around illegal wildlife trade, especially in wildlife market hubs in Sumatra and Kalimantan. Local government units and provincial authorities will take the lead on implementing ecotourism pilots, managing livelihood initiatives, and coordinating task force operations. Research institutions will support biodiversity monitoring, socio economic assessments, and supply chain mapping. Critically, civil society and academic partners will feed real time insights from the field into adaptive management processes led by provincial BKSDA offices and the Directorate General of KSDAE, ensuring that implementation reflects on the ground realities and informs adjustments to policy and program design at the national level.?

Component 4

?This component will be implemented collaboratively by government agencies, academic institutions, and civil society organizations. Academic and research institution will co-lead the development and refinement of decision support tools using project monitoring data, spatial analysis, and participatory inputs from pilot sites. Civil society partners, to be engaged through transparent selection processes, will contribute to knowledge documentation, peer exchange, and dissemination through national and international platforms such as the Global Wildlife Program. The Ministry of Environment and Forestry?s Center for Data and Information will oversee integration into government systems, while technical partners such as the Indonesian Institute of Sciences (BRIN) and local IT service providers will support the development of operation rooms and digital infrastructure. These collaborative efforts will ensure that knowledge products are accessible, policy relevant, and grounded in site level realities.?

j.i) The following entries have been made in the Project Description:

Output 1.1:

?Gender responsive consultations will be conducted at national and subnational levels, with minimum thresholds (30%) for women?s participation in IWT Working Groups and other coordination platforms. Participation will be tracked and reported, and the process will be guided by the project?s Gender Action Plan. To ensure meaningful inclusion, the project will adopt differentiated approaches across key sites. In South Sumatra, women?s civil society networks already engage in environmental governance and will be invited to policy dialogues on wildlife trade enforcement. In contrast, in Jambi, women?s participation in natural resource policymaking has been limited; here, the project will collaborate with local women?s cooperatives and religious leaders to create safe spaces for consultation and feedback. These approaches aim to go beyond

token participation, ensuring that women influence the substance of legal and institutional reforms related to IWT. Feedback loops will be built into policy review cycles to capture and incorporate gendered perspectives at multiple stages.?

Output 2.1:

?Women face additional challenges in IWT law enforcement due to the predominance of male offenders and the male-dominated nature of enforcement institutions. Under Output 2.1, training programs will include gender-sensitive content tailored to frontline realities. At least 30% of participants will be women, with targeted outreach to female officers and trainees. The approach will be context-specific across sites. In South Sumatra, for example, female rangers have begun participating in mixed patrols, but report challenges related to cultural expectations and field deployment logistics?these will inform the design of site-level support systems. In Jambi and North Sumatra, where women are underrepresented in enforcement roles, the project will explore entry points through administrative, intelligence, and community liaison functions that align with both need and social acceptability. Inclusive leadership and feedback processes will be promoted across all coordination mechanisms. Activities will be guided by the project?s Gender Action Plan to ensure culturally grounded, feasible entry points and reduce structural barriers to meaningful participation.?

Output 1.3:

?Women often face barriers in accessing financial services and conservation incentives due to structural inequalities such as limited financial literacy, asset ownership, and representation in decision-making. Under Output 1.3, the project will conduct a gender-responsive review of financial and regulatory mechanisms to identify and address these constraints, including gender disparities in land tenure and inheritance that may limit eligibility for certain schemes.

Tailored financial literacy trainings and targeted outreach will be delivered through trusted community actors and women?s groups, helping women understand, access, and benefit from restitution funds and fine-reinvestment mechanisms. In Jambi, where women?s access to formal financial institutions is particularly limited, the project will partner with local savings and loans cooperatives to deliver informal trainings and explore mobile finance tools. In South Sumatra, the project will build on existing women-led microenterprise networks to pilot conservation-linked financing schemes and improve uptake. The project will also explore alternative eligibility models that recognize women?s unpaid labor and caregiving roles. All activities will be implemented in accordance with the project?s Gender Action Plan and tracked through sex-disaggregated participation and outcome indicators.?

j.ii) Confirming that gender-specific results and progress in implementing the Gender Action Plan will be tracked and reported in the PIRs, Mid-Term Review, and Terminal Evaluation.

m.) The sustainability description has been replaced with the following entry:

?The sustainability of the GEF investment is underpinned by a sustainability strategy; a preliminary version is provided in **Annex 29** to the Project Document. The sustainability strategy, which will be operationalized during the project implementation phase and regularly updated, supports the long-term continuity of core project outcomes, particularly in protected area management, law enforcement, and community-based conservation.

At the **site level**, the project promotes mechanisms such as **retention of fines and penalties**, **cost-sharing arrangements with local governments**, and **performance-based budget allocations** to ensure that Protected Area authorities can sustain enhanced enforcement and community incentive programs beyond the GEF funding period. These tools are integrated into METT-aligned site management plans under Component 3, linking governance improvements directly to financial sustainability.

At the **national level**, the project leverages partnerships with **BIOFIN Indonesia** and the Ministry of Finance to institutionalize **biodiversity budget tracking**, align conservation outcomes with **performance-based budgeting**, and advocate for **recurrent budget allocations** for key enforcement and conservation activities.

Importantly, Component 1 supports the **legal and regulatory reforms** necessary to operationalize these mechanisms, including updates to allow for the **repatriation of environmental fines** to support biodiversity programming and protected area operations.

Together, these measures form a **coherent financial ecosystem** that anchors conservation impacts in long-term institutional and budgetary frameworks?ensuring that the results of this investment are financially and operationally sustainable.?

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.).
- d) [If a child project under an integrated program] Does the framework for coordination and collaboration demonstrate consistency with overall ambition of the program for transformative change?

Secretariat comment at CEO Endorsement Request

HF July 7, 2025

Cleared.

HF July 2025

The current budget has UNDP executing 70% of the project with the Min of Forestry executing 30%. The Council Approved concept has the Min of Forestry and Ministry of Finance, Ministry of Agriculture, National Research and Innovation Agency (BRIN) as executing entities. Not UNDP. This is not justified nor permissible based on GEF policy and the required separation of execution and implementing functions.

Please remove the request for self-execution from the CEO endorsement document package. The request is not aligned with the policy amendment approved by the Council at its 69th meeting (Annex III page 14: https://www.thegef.org/sites/default/files/documents/2025-05/EN_GEF_C.69.12_Policy%20Amendments%20to%20Streamline%20the%20GEF%20Project%20Cycle-May%202025.pdf). Any proposed change in execution arrangement must follow current GEF policy and relevant guidance from the GEF Secretariat available at the time of such proposals. The project is facing cancellation deadlines and will not be CEO Endorsed with the proposed self-execution exception.

HF May 2025

a.) Yes.

b.) According to the request and justification, over \$300,000 in project funds are proposed to be executed by UNDP, at no cost to the GEF by way of fees. The submission includes a request letter from the (previous) OFP and an annex detailing the support and justification. Please note that although the agency has uploaded a letter of support, it is not signed by the current OFP, thus it is not valid. We kindly request the agency to obtain a letter of support signed by Mr Erik Primiantoro.

b.i) This section of the CER also states that the GEF has agreed that UNDP will be both implementing and executing a portion of this project. That is not accurate and not yet the case. Please redact.

b.ii) Annex 34 seems to provide many cases of dual execution by UNDP as the Implementing and Executing Agency, highlighting the technical and award winning capacity. This actually seems to weaken the justification as it focuses on the central role and capacities that have been built in UNDP rather than in local institutions and organizations to do the work and play the coordination role. Suggest revising.

b.iii) Execution support by the GEF Agency should be stripped back and only include the most essential basic functions for which no other options exist.

b.iv) Please review the criteria for eligible cases for a GEF Agency to play a dual implementation-execution role and respond accordingly including how the dual execution request meets any of these criteria: https://www.thegef.org/sites/default/files/documents/2025-05/EN_GEF_C.69.12_Policy%20Amendments%20to%20Streamline%20the%20GEF%20Project%20Cycle-May%202025.pdf

b.v) Finally, please see note on budget as UNDP is included as the executing entity for most of the activities included in the budget, much more than \$300,000. Please clarify and revise.

c.) Please make sure the project is not duplicating works from GEFID 11323 and collaborate the World Bank coral bond team and IEF focal points for GEFID 11323 to share experience in issuing the ecosystem bond and baseline studies such as needs assessment.

d.) Yes.

Agency Response

4 July 2025

Noted on the Council-approved policy amendments on the separation of GEF Implementing and Executing Agency roles at its 69th meeting (May 2025), which no longer permits self-execution by GEF Implementing Agencies under any circumstances except where expressly authorized. We fully respect this policy and revised the project institutional arrangement and modality to full NIM accordingly.

However, we respectfully highlight that the proposed execution support services by UNDP were originally intended to address fiduciary and administrative gaps identified through the 2024 HACT micro assessment of the Ministry of Forestry. The assessment noted moderate risk ratings in two out of eight functional areas:

- ? Organizational risk, primarily due to unresolved reputational concerns related to legacy issues from a prior ministry structure; and
- ? People and Behavior, due to the lack of formal HR procedures for recruiting non-ASN personnel (e.g., project-based consultants), which is critical for the effective implementation of donor-funded initiatives.

These limitations prompted the request for targeted execution support to safeguard fiduciary compliance, ensure timely project start-up, and prevent operational delays particularly during the first two years of implementation.

That said, we fully commit to complying with GEF policy and have revised the project institutional arrangement to full NIM. UNDP will not assume any self-execution roles.

All necessary adjustments are reflected in the revised CEO Endorsement Request, ProDoc, and Annexes to maintain full compliance with the GEF policy framework. We remain committed to moving the project toward endorsement while ensuring institutional ownership and fiduciary integrity.

30 June 2025

b) The revised letter of execution support signed by the current Operational Focal Point, Mr. Erik Primiantoro is uploaded.

We would like to clarify that the estimated USD 300,000 referenced in the submission is not sourced from GEF project funds. Rather, this amount represents the estimated cost of execution support services to be provided by UNDP, calculated based on the most recent Universal Price List (UPL) in accordance with UNDP's global cost norms.

These services—including support in procurement, recruitment, financial assurance, and quality control—will be delivered under the proposed execution support and will be fully covered by UNDP Country Office resources from non-GEF funding. Accordingly, this amount does not represent a fee or charge to the GEF project budget.

b i) This has been redacted in the CER.

b ii) Annex 34 has been revised and focuses on the needs and capacity gaps in the implementing partner requiring the proposed execution support services from UNDP.

b iii) In addition to 5.2.a above and as detailed in the justification note there are strong reasons, gaps and needs in the IP which have led to the proposed execution support by UNDP. This has been discussed again with the IP and the IP has reiterated the need for the outlined support services specified to ensure cost-efficiency and necessary administrative support that is critical for the project.

All execution functions requested from UNDP are carefully scoped to address identified capacity gaps in fiduciary and operational areas of the Implementing Partner. These functions are designed not as a substitute for national implementation, but rather as an enabling mechanism to ensure operational continuity, accelerate project start-up, and safeguard compliance with GEF policies and fiduciary standards.

UNDP's involvement is further structured to build national systems over time through a clearly defined capacity transfer strategy, with the goal of progressively phasing out execution roles as national capacities are strengthened and institutionalized. In this way, UNDP's support serves not only to fill current gaps, but to leave behind strengthened national systems and institutions that are better equipped to independently manage future GEF-funded interventions.

b iv) According to GEF Policy No. GEF/C.69/12 that was introduced in May 2025, UNDP as IA allows for dual implementation (serving as both Implementing and Executing Entity) under specific conditions, such as:

- ? Where no other national or local entity has the capacity to execute key functions;
- ? Where the activity is technically complex or spans multiple sectors/agencies;
- ? Where UN rules/regulations or fiduciary standards are necessary to safeguard financial or reputational risks.

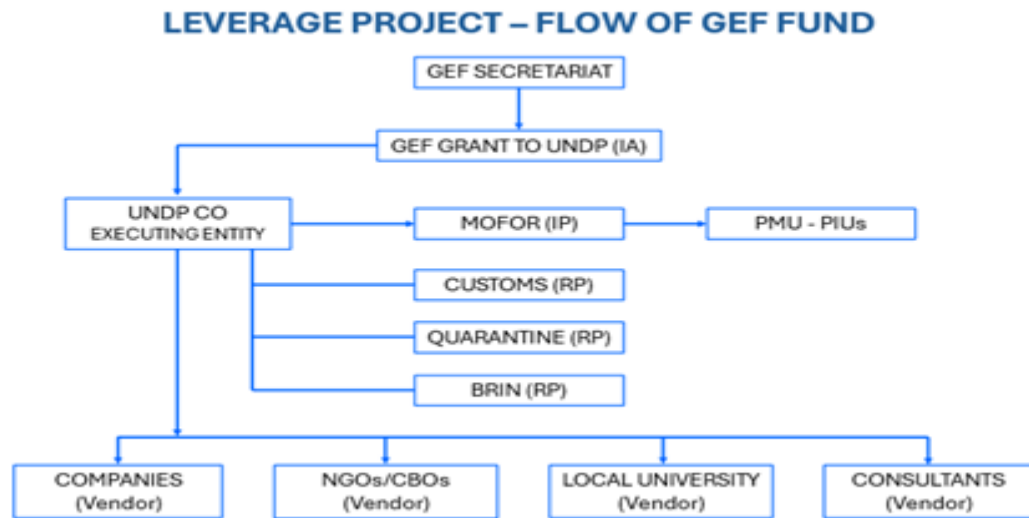
The LEVERAGE project meets all these conditions due to:

- ? The involvement of multi-agency law enforcement bodies (Forestry, Customs, Quarantine, BRIN, and/or National Police), which lack a unified legal mechanism for fund transfer and coordination.
- ? The need for procurement and hiring of international experts, for which national systems are not fully equipped.
- ? While the DG of Law Enforcement, Ministry of Forestry (MoFor) received an overall ?low risk? rating, the HACT report clearly identifies critical gaps that are relevant to donor-funded project execution. MoFor lacks the necessary regulation for project-funded staff recruitment, donor reporting systems, and shared cost allocation frameworks, as shown in the HACT micro-assessment report. In addition, ongoing institutional restructuring, leaves gaps in leadership, procurement, and decision-making authority during transition.

These risks cannot be mitigated through oversight alone. UNDP's proposed execution support is necessary to:

- ? Ensure compliance with GEF fiduciary standards.
- ? Enable smooth fund disbursement and procurement during early-stage implementation.
- ? Maintain project continuity during government restructuring.

The planned fund flow is as follow:



Notes:

- ? MoFor remains the National Project Director, leads oversight and control the work plan.
- ? UNDP facilitates fiduciary responsibilities (disbursement, reporting, procurement).
- ? Under UNDP's direct payment execution support services, Project Responsible Parties will coordinate the execution of the project outputs as reflected in Prodoc and further approved annual work plans. The existing regulation (PP No 10/2011) does not allow fund transfer from MoFor to other line ministries (RP). Link to the regulation: <https://peraturan.bpk.go.id/Details/5132/pp-no-10-tahun-2011>
- ? NGOs, CBOs, and local universities receive funds via UNDP due to lack of legal pathway for government to directly fund them.

b v) The total value of UNDP's cost recovery (DPC) for providing execution support is \$303,809.99, covering HR, procurement, travel, and financial management services over the full 6-year project period. None of these costs will be charged to the GEF Grant. They are covered by non-GEF sources. The proportion of the budget under UNDP execution has been adjusted.

c.) The LEVERAGE project will actively coordinate with GEF ID 11323 (Indonesia Ecosystem Bond for Marine and Terrestrial Biodiversity), implemented by the World Bank in partnership with

the Indonesian Environment Fund (BPDLH). While LEVERAGE focuses on terrestrial ecosystems and law enforcement in Sumatra, both projects share strategic goals in biodiversity conservation financing and institutional strengthening.

To avoid duplication and enhance mutual learning, the LEVERAGE team will collaborate with the World Bank's coral bond team and IEF focal points to:

- ? Exchange knowledge on the issuance and structuring of ecosystem bonds.
- ? Share baseline assessments and needs analysis for conservation finance.
- ? Align regulatory and financing policy recommendations where relevant.
- ? Explore potential synergies in biodiversity valuation methodologies, enforcement financing, and co-financing pathways.

MoFor (IP) and UNDP will coordinate through the GEF National Steering Committee and relevant technical working groups, ensuring that LEVERAGE complements and builds upon the innovations piloted under GEF ID 11323. Lessons from the ecosystem bond and its enabling framework will inform the design and sustainability of LEVERAGE's conservation financing mechanism under Component 1.

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)? [If a child project under a program] Is the choice of core indicators consistent with those prioritized under the parent program?

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

HF July 2025

Cleared. All comments on core indicator 6 calculation and methodology/justification have been satisfactorily addressed. Thank you for the useful clarifications and revisions.

HF May 2025

a.) No, Core Indicator 6 calculations: With 23 MtCO₂, core indicator 6 is overestimated. The reasons for this are double:

(i) Qualitatively first : there is no clarity on why the project activities are expected to result in reduced deforestation. Improving protected area management effectiveness with a focus on wildlife does not necessarily result in a relative increase in biomass, especially when they only deal with fauna monitoring and poaching prevention, which has little to do with forest biomass per se. Proponents should provide clarity on what are the drivers of deforestation on these areas, and why and how project activities (specifying which ones in detail) are expected to address these drivers of deforestation. Similar questions for drivers of degradation and of forest fires. If this question is not properly answered, then there is no need at all to do a GHG emission reduction estimate calculation, so it would be appreciated if a priority can be given to this clarification based on the project theory of change.

(ii) Quantitatively then, subject to clarification of the question above, which is the premise for reporting anything at all under core indicator 6.

1. Proponents chose not to use EXACT and to use national forest methodologies to allow for registration and monitoring of the project. This is fine, although you will see from the below comments that there are some functions that EXACT allows to do more easily and that could help save time (in particular clarifying the expected outcomes in a scenario with the project as opposed to without, and a de facto alignment with IPCC standards). Per GEF guidelines, as you are not using EXACT, please do justify how the methodology used including emission factors and activity data align with IPCC standards.
2. The estimate of reduced deforestation is made on a top-down fashion based on the country's NDC targets for the sector. This is not at all based on project activities but on political targets. GHG estimates should be based on tangible activities covered by the project with a demonstration of why the project are likely to yield measurable relative biomass increase with the project as opposed to without. This comes with a comparison of a situation without the project with a situation with the project.

Based on the answer to the qualitative question above, please assess whether any reduced deforestation is expected based on project activities and their magnitude and resources and constraints of the project, not based on a top down political target of emission reductions.

In order to do this, please establish an estimated baseline of expected deforestation without the project in the next 20 years, and with the project, to then make the difference between the two.

Please also clarify where the baseline data on deforestation levels come from (source) ? is it accurate that this deforestation is happening inside of these specific protected areas, or are these taken from overall national deforestation rates? If no deforestation is observed in the protected areas then there is no need for a calculation.

If there are deforestation trends observed, please also justify your assumption of how you think the deforestation rates would evolve without the project (given that there might be other initiatives targeting these spaces that may also yield reduced deforestation, hence the scenario without the project should likely not be the simple continuation of the baseline).

3. The area considered is too large. While the calculation already reduced the area considered to only cover forested areas among the project targeted protected areas, still this area remains too large. Only a portion of this surface is likely to be directly impacted by the project. Other projects usually would consider the peripheral portion of the targeted forest, which is closer to the landscape level activities conducted, and subject to the most threats, in the calculation, as this would be the area most likely to be impacted. Using 10% of the selected hectareage as input to the calculation would be a good proxy to land on a more conservative estimate.
4. Finally, if reporting anything at all, the outcome should be reported as indirect impact, not direct.

Please make corrections and revisions accordingly.

Agency Response

4 July 2025

Clarification for the project's target for indirect contribution to carbon emissions reduction:

Due to a calculation error the previous estimate of 487,600 CO₂e has been revised to 2,302,934 CO₂e. The spreadsheet showing the calculation is attached.

30 June 2025

Utilizing the full flexibility of GEF-8 programming, the project strategically employs STAR allocation from the Climate Change focal area to program for the Biodiversity Focal area priorities for Indonesia.

a. (i) The LEVERAGE project targets five protected areas in Sumatera that are vulnerable to ongoing pressures including illegal encroachment, unsanctioned land clearing, logging, and fires. Project activities (such as enhanced patrols, spatial surveillance, fire prevention, and co-managed buffer zone agreements) are designed to reduce these threats and are expected to result in avoided deforestation and degradation, particularly in PA peripheries. These drivers are well documented in MoFor's annual forest monitoring reports and studies from Global Forest Watch. While the project's primary focus is biodiversity protection and enforcement, its activities serve to indirectly reduce carbon emissions by deterring illegal forest conversion and improving landscape integrity.

(ii) The original GHG estimate was based on Indonesia's ENDC targets and has been revised using a bottom-up methodology, relying on:

- ? Based on historical trends from 2013-2023, the project intervention areas face an average annual deforestation of 2,439 ha/year and degradation of 2,590 ha/year (0.52% annually across targeted sites).
- ? To ensure methodological conservatism, the project considers only 10% of the total forested area (53,246 ha) as the zone of potential GHG impact, primarily buffer zones targeted by LEVERAGE enforcement, fire prevention, and community engagement activities.
- ? An emission factor of 200 tCO₂e/ha (IPCC Tier 1, tropical moist forests).
- ? A projected 50% reduction in deforestation across 20 years (1,219 ha/year avoided) due to project interventions.

This results in a new estimated **indirect reduction of 487,600 tCO₂e** over 20 years. The emission factor and deforestation trends are consistent with **Indonesia's 2nd FRL**, and the methodology aligns with **KMSAH001**, which follows IPCC 2006 standards and is embedded in Indonesia's MRV and climate registry system. The KMSAH001 (*Kegiatan Mitigasi Sektor AFOLU Hutan* or AFOLU Forest Sector Mitigation Activities 001) methodology is an Indonesian government-approved GHG accounting approach developed to support climate mitigation activities in the

AFOLU (Agriculture, Forestry, and Other Land Use) sector. It is part of the country's National Registry System on Climate Change (SRN-PPI), administered by MoFor.

b. The project chose to use the KMSAH001 methodology—a nationally endorsed method for estimating emission reductions from reduced deforestation in forest ecosystems—instead of the FAO's EX-ACT tool. This decision is based on the following technical and strategic justifications:

(i) National Relevance and Policy Alignment. The KMSAH001 methodology was developed to support Indonesia's Forest Reference Emission Level (FREL) submissions and is fully aligned with Indonesia's 2nd FREL, which has been technically assessed and accepted by the UNFCCC. Using this method ensures the GHG estimations are compatible with national MRV systems, which is essential for eventual registration, tracking, and potential inclusion of results under Indonesia's NDC reporting and carbon accounting frameworks.

(ii) Consistency with IPCC Guidelines. The methodology adheres to the IPCC Guidelines for National GHG Inventories, particularly the 2006 IPCC Guidelines and 2019 Refinement, through the use of:

- ? IPCC Tier 1 emission factors, which are internationally recognized default values,
- ? Spatial activity data derived from national forest cover change maps,
- ? Transparent and conservative assumptions regarding deforestation baselines and avoided emissions.

Thus, even without EX-ACT, the calculation framework remains scientifically robust and fully aligned with IPCC standards.

(iii) Transparency and Replicability for Domestic Integration. Unlike EX-ACT, which functions as a "black box" model with limited customizability for local policy nuances, the selected method allows project stakeholders—including government agencies and national research institutions—to replicate, verify, and integrate calculations into Indonesia's official MRV platforms. This strengthens national ownership and supports future upscaling.

(iv) Institutional Integration and Operational Readiness. Using a national methodology facilitates future registration of results under Indonesia's national climate registry, supports potential nesting within jurisdictional REDD+ initiatives, and ensures the long-term sustainability of monitoring efforts beyond the project life cycle.

3. The revised estimate considers only the buffer zones most likely to be affected by enforcement and community engagement activities. This 10% proxy follows a precautionary principle, aligning with GEF Secretariat suggestions. The revised area (53,246 ha) excludes core forest regions with little human pressure and reflects where project interventions are expected to have measurable

effect. The estimate also acknowledges other initiatives in the area and adopts moderate assumptions to avoid over-attribution to the LEVERAGE project alone.

The emission reduction is now classified as an indirect impact, recognizing that the project's contribution stems from governance improvements, deterrence, and protection rather than direct restoration or land-use change. This classification follows GEF guidance and is consistent with the project's intervention logic. Reporting of Core Indicator 6 will be reflected accordingly in the Results Framework and updated in the ProDoc and CER.

Further, Section Global Environmental Benefits of the ProDoc (page 35, para 108) under 2nd bullet - Forest Cover Preservation is revised as follow:

The project will contribute to indirect GHG emissions reduction through improved protected area enforcement, deterrence of illegal encroachment, and fire prevention. While the LEVERAGE project does not implement reforestation or direct land-use change interventions, it reduces the drivers of forest degradation and deforestation within targeted zones in five protected areas in Sumatra.

A conservative 10% (53,246 ha) of the total forested area within project landscapes is assumed to be influenced by enforcement and co-management activities. Historical baseline data from KLHK and Global Forest Watch show annual deforestation rates of ~0.5%. Assuming a 50% reduction in this rate due to project activities over 20 years and using an IPCC Tier 1 emission factor of 200 tCO₂e/ha, the total estimated GHG emissions mitigated is 487,600 tCO₂e over 20 years.

This estimate is classified as indirect and derived using the KMSAH001 methodology consistent with Indonesia's 2nd Forest Reference Level (FRL) and the IPCC 2006 Guidelines (Vol. 4, Chap. 4). The emission factor and deforestation data are officially recognized under Indonesia's climate MRV system (SRN-PPI).

The revised estimate replaces previous calculations based on ENDC targets and better reflects realistic, bottom-up impacts attributable to the LEVERAGE intervention scope.

Mandatory Indicator 2 (GEF-8 CI 6) in Section VI, page 78: Greenhouse gas emissions mitigated (metric ton of CO₂e) target will be 487,600 tCO₂e (indirect, over 20 years).

4. Emission reductions will be reported as indirect outcomes, recognizing that activities such as wildlife patrols, community-based co-management, and forest fire reduction improve the enforcement landscape but are not direct carbon sequestration interventions.

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

HF May 2025

Yes.

Agency Response

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?

b) [If a child project under an integrated program] Is the project adequately aligned with the program objective in the GEF-8 programming directions?

Secretariat comment at CEO Endorsement Request

HF May 2025

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

HF July 2025

Cleared.

HF May 2025

Please review and reference how this project contributes to the new GBF Global Biodiversity and Health Action plan. This would be a good place to start to focus and streamline One Health and zoonotic activities to ensure they are aligned and focused with GEB outcomes.

Agency Response

30 June 2025

?The LEVERAGE project directly supports the **Global Action Plan on Biodiversity and Health**, adopted under the GBF, by integrating zoonotic spillover risk mitigation into biodiversity-focused strategies. These activities are structured to ensure that GEF resources remain tightly aligned with global environmental benefit (GEB) outcomes while drawing on co-financing for public health-specific expenditures. Key areas of alignment include:

- ? **One Health Integration:** Through Outcome 3.2, the project strengthens cross-sectoral collaboration between the Ministry of Forestry, Ministry of Agriculture, and public health agencies. This institutional coordination supports GBF-aligned governance mechanisms to reduce wildlife-related disease risks.
- ? **Spillover Prevention at Wildlife Trade Interfaces:** Outputs 3.2.1 and 3.2.3 implement surveillance, biosafety protocols, and risk mitigation at high-risk trade and border points. These activities are fully targeted toward biodiversity conservation outcomes, while public health inputs such as PPE and medical supplies are financed exclusively through co-financing contributions.
- ? **Surveillance and Early Warning Systems:** The project enhances national wildlife health monitoring systems and develops triage tools for frontline screening. These investments support GBF **Target 5** on reducing pathogen spillover risk and align with GEF-8 objectives for early detection of ecological threats.
- ? **Knowledge Sharing and Regional Replication:** Component 4 links the project to the GWP global knowledge platform and regional One Health initiatives, ensuring that Indonesia's models benefit from and contribute to existing tools, rather than duplicating them. This responds directly to the Global Action Plan's call to build on shared assets and avoid redundant materials.
- ? **Inclusive Implementation and Safeguards:** Project safeguards under the ESMP and IPP ensure that zoonotic risk mitigation is participatory, equitable, and protective of Indigenous Peoples and vulnerable communities, aligned with GBF **Target 22** on rights-based implementation.

Together, these actions demonstrate how the project applies the **Global Action Plan's guidance** with precision, ensuring that zoonotic health interventions are embedded within biodiversity outcomes, not parallel to them. This alignment reinforces GEF eligibility and enhances the coherence and sustainability of the project's integrated One Health strategy.?

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

HF May 2025

yes

Agency Response

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request

HF May 2025

Yes.

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request
HF May 2025

Yes.

Agency Response

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request
HF May 2025

Yes.

Agency Response

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request

HF May 2025

Yes

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
HF May 2025

Yes.

Agency Response

Focal Area allocation?

Secretariat comment at CEO Endorsement Request

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

Agency Response
8.2 Project Preparation Grant (PPG)
a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement Request
HF May 2025

Yes.

Agency Response
8.3 Source of Funds
Does the sources of funds table match with the amounts in the OFP's LOE?
Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement Request
HF May 2025

Yes.

Agency Response
8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?
e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement Request
HF July 2025
Cleared.

HF May 2025

Please submit the confirmed letter of cofinancing support for the Ministry of Finance and Indonesia Quarantine Agency. Otherwise, please remove them from the cofinancing table.

Agency Response

30 June 2025

The co-financing letters translated to English along with the original signed Bahasa versions are attached. The revised annex 33 on co-financing from government has included the co-financing letter from all three government institutions: Ministry of Forestry, Ministry of Finance, and the Indonesian Quarantine Agency.

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 RequestNA

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?

e)[If a regional/global coordination child project under an integrated program] Does the results framework reflect the program-wide result framework, inclusive of results from child projects and specific to the regional/global coordination child project? [If a country child project under an integrated program] Is the child project result framework inclusive of program-wide metrics monitored across child project by the Regional/Global Child project?

Secretariat comment at CEO Endorsement Request

HF July 2025

Cleared.

HF May 2025

Yes. Though the results framework will require revision based on previous comments.

Agency Response

Annex E: Project map and coordinates

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

Secretariat comment at CEO Endorsement Request
HF May 2025

Yes.

Agency Response

Annex F: Environmental and Social Safeguards Documentation and Rating

8.8 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

HF July 2025

Cleared.

HF May 2025

It is noted that the overall project risk rating as indicated in the risk table in the portal is moderate. However, in the same table the environmental and social risk rating is substantial and the attached SESP and the ESMP also indicate a substantial risk rating. Please clarify and provide consistency across the risk ratings.

Agency Response

30 June 2025

The overall risk rating in the risk table has been corrected to ?Substantial?.

Annex G: GEF Budget template

8.9 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

HF July 7, 2025

Cleared.

HF July 2025

a.) Two remaining issues with the format of the budget making it illegible for review in the pdf of the CER, these need to be fixed prior to GEF Council circulation. Please contact ITS with cc to PM if running into further issues:

i.) The budget is duplicated in the portal entry field. To fix, please only include a copy/paste of budget into the portal entry field, don't also upload the budget as a file to the portal template/field as well since this is what is causing the duplication in the pdf (it is okay to be in the documents tab as an attachment though);

ii.) The budget formatting flows outside the margins of the portal entry and is cut off. Please fix so that in the portal entry field it isn't overflowing the margins, and so that the pdf of the document for council review is legible.

b.) See previous comments regarding dual execution.

c.) cleared.

d.) cleared.

- e.) Vehicle rental is approved by PM based on necessity and justification to deliver project results.
- f.) cleared.

HF May 2025

- a.) Please include the budget in the portal entry of the CER-not just as an attachment. The GEF Council will only be able to review the pdf of the CER portal view, no annexes or attachments.
- b.) The far right column of the budget indicates the executing entity for the project. It looks as though UNDP is designated as the executing entity for a large proportion of the project budget, many millions of dollars, and beyond what the is proposed for self-execution in the justification and OFP request letter (\$300 k about). Please redact/fix/revise.
- c.) The budget needs to be broken down into line by line, including for positions. Please include TORs for positions to review alignment with budget allocation.
- d.) A Chief Technical Advisor is being charged across components. Per Guidelines, the costs associated with the project's execution have to be covered by the GEF portion and the co-financing portion allocated to PMC. When the situation merits (i.e. not enough co-financing funds ? which for this project is not the case), the project's staff could be charged to the project's components with ?clear Terms of Reference describing unique outputs linked to the respective component? (paragraph 4 ? page 42 of the Guidelines). We were not able to locate the TORs for this position. Please either reallocate expenses to PMC or submit TORs.
- e.) Please use PMC to cover the cost of vehicles and provide strong justification for the use a portion of GEF funds.
- f.) When resubmitting the new budget please present the activity lines a little different, instead of having multiple positions / activities bundled into one activity. Please ask the Agency to present each activity/staff/service individualized with its associated costs.

Agency Response

4 July 2025

- a.)
 - i) The budget duplication is fixed in the portal. The GEF budget word file is removed and uploaded as an attachment in the document tab/section.
 - ii) The budget table is reformatted to fit the margins of the portal entry
- b.) In response to earlier comments regarding dual execution, the budget has been revised to remove dual execution and ensure that UNDP will not implement or execute any project activities.

30 June 2025

a. The budget has been included in the GEF portal.

a. The GEF Budget template is revised based on the revision of the entire budget under UNDP support services. The actual execution arrangement of the project reflects a dual mechanism, in which 30% of the GEF grant is allocated to the Implementing Partner (Ministry of Forestry) and 70% is designated under UNDP execution through the National Implementation Modality (NIM) with proposed execution Support Services. This arrangement has been accurately reflected in the revised budget structure.

Previously, the column in Annex G listed "UNDP" as the executing entity for several activities. The budget template has since been revised to clearly align execution responsibilities with the endorsed modality/arrangement and to accurately represent the division of implementation roles between UNDP and the Implementing Partner.

Additionally, we would like to emphasize that the cost of UNDP's support services represented under the Direct Project Cost (DPC) allocation, totaling USD 303,810 is entirely funded by UNDP CO and not charged to the GEF grant. These services include selected procurement, recruitment, financial management, and logistics functions, as outlined in Annex 34 ? Justification Note for COSS. The DPC represents UNDP's in-kind contribution to ensure quality assurance, fiduciary compliance, and timely implementation while fully preserving government ownership and leadership of the project.

c. The budget has been revised line by line as requested.

d. The ToRs for each of the positions have been submitted and are attached again, including for the CTA. Please refer to Annex 07 of project team's ToR.

e. The rental of vehicles is essential to support the implementation of field activities, particularly those related to illegal wildlife trade monitoring and biodiversity protection. The project sites are located in remote and difficult-to-access areas where public or conventional transportation is unavailable or unsuitable for field operations.

Rented vehicles will be used to facilitate patrols, surveillance, site visits, and rapid response activities, including the secure transportation of critical evidence gathered during enforcement operations. Reliable and fit-for-purpose transportation is crucial to ensure that monitoring teams and enforcement personnel can reach target areas in a timely and effective manner.

Given the limited availability of government-owned vehicles in these regions, rental presents a flexible and cost-effective option to meet operational needs without creating long-term asset management obligations. Utilizing a portion of GEF funding under project activities, to cover these rental costs is both justified and necessary to ensure the project's ability to achieve its intended outcomes in combating illegal wildlife trade and safeguarding biodiversity.

In addition to the above explanation, the budget for rented vehicles has been revised to fully reflect the necessity and relevance of the respective technical components.

f. The budget has been revised as requested.

Annex H: NGI Relevant Annexes

8.10 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

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

HF July 2025

Yes, cleared for Council circulation. August 9th, 2025 is the 2nd cancellation deadline.

July 2025

No, not yet. Please review comments and respond/revise accordingly.

HF May 2025

No, not yet. Please review comments and respond/revise accordingly.

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

	CEO Approval	Response to Secretariat comments
First Review	5/20/2025	6/30/2025
Additional Review (as necessary)	7/1/2025	7/7/2025
Additional Review (as necessary)	7/7/2025	
Additional Review (as necessary)		
Additional Review (as necessary)		