

The Freshwater Challenge: Accelerating Restoration and Conservation of Freshwater Ecosystems

Review CEO Approval and Make a recommendation

Basic project information

GEF ID
11833
Countries
Global (Brazil, Cambodia, Tanzania)
Project Name
The Freshwater Challenge: Accelerating Restoration and Conservation of
Freshwater Ecosystems
Agencies
WWF-US
Date received by PM
9/6/2025
Review completed by PM
12/15/2025
Program Manager
Andrew Hume
Focal Area
International Waters
Project Type
MSP

PIF
CEO

Part I - General Project Information

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

Secretariat comment at CEO Endorsement Request

(9/16/2025)

1. On the executing Partners: some of them are GEF Agencies, not CSOs (IUCN, Conservation International) ? please amend.
2. Please add the countries in the field "Countries" (i.e. to read "Global, Brazil, Cambodia, Tanzania")

(11/7/2025)

1. Addressed.
2. Please contact GEF IT to aid in the revising this <Priyanka Chandrahas Kamat <pchandrahaskamat@worldbankgroup.org>

(11/19/2025)

Comments have been addressed.

Agency Response

WWF GEF Agency Response 11.17.2025;

This request has been worked on by the GEF IT team, please see the updated countries list

WWF GEF Agency Response (11.05.2025):

Thank you for this comment. The CSOs listed have been changed to be "GEF Agencies." The countries listed in the portal cannot be adjusted as these were set at PIF stage and are "Greyed out" in the portal.

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

Secretariat comment at CEO Endorsement Request

(9/16/2025) Yes

Agency Response

2. Project Summary.

- a) Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected outcomes?**
- b) Does the summary capture the essence of the project and is it within the max. of 250 words?**

Secretariat comment at CEO Endorsement Request

(9/16/2025)

1. Please add (briefly) that the project will aid countries to set and monitor freshwater targets and developing an indicator framework for the FWC that could be a model to track the achievement of country specific targets and track the status of rivers and wetlands on national and transboundary levels.

(11/7/2025)

1. Addressed.

Agency Response

WWF GEF Agency Response (11.05.2025):

Thank you for this very important point- we have added reference to Component 1 in the summary which has been elaborated to reflect this comment.

3. Project Description Overview

- a) Is the project objective statement concise, clear and measurable?
- b) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?
- c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
- d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
- e) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

(9/16/2025)

1. PDO: please consider changing the wording "...prioritization of specific *places* in policies and plans, ...". Would "... *provisions*.." capture this better? Feel free to consider other formulations that would express the intention better than "places".

2. PMC: the slightly higher PMC costs are well justified for these kind of global MSP projects which naturally are heavy in the transaction costs of engaging with a large range of partners, including the youth challenge grants, and several countries and small contract amounts all adding to this.

3. The M&E costs are high in terms of % of the grant sub-total (over 5%). Please revise the M&E budget to align with the Guidelines.

(11/7/2025)

1. Addressed

2. Addressed.

3. Please move IW:LEARN 1 % to components 3 and 4 (knowledge exchanges, awareness, engagement and partnerships). It is mentioned in the component title of component 4. Once you move these funds, the M&E budget allocation is within the range as per the latest GEF guidelines (see para 19. page 20 of https://www.thegef.org/sites/default/files/documents/2025-10/GEF_C.70_Inf.18_Guidelines_Project_Program_Cycle_Policy_1_0.pdf).

(11/19/2025)

3. The 5% is indeed a portfolio average and this project including both global activities and engaging three pilot countries can make a case for somewhat higher M&E costs. The current with 5.8 % is within a reasonable margin and the GEFSEC PM agrees with the reasoning of these increased M&E costs.

Cleared.

Agency Response

WWF GEF Agency Response 11.17.2025;

We have moved 1% IW Learn to component 3 and 4. However, we apologize that the previous budget omitted cost for a mid-term evaluation and only included costs for terminal evaluation. Per policy, we have now added in MTE costs and as such the amount for M&E still exceeds 5% despite allocating all IW funding to Components 3 and 4. In WWF GEF project evaluations, we continue to receive feedback that there is a need to allocate more resources to project monitoring and to the external evaluations. WWF-US standards are between 5-10% of project budget. The Monitoring and Evaluation budget for this project takes into consideration that this is a multi-level project (global plus 3 countries) and is a direct response to requests from the involved country governments for adequate M&E funding. Funding for a mid-term and terminal evaluation must be budgeted under the M&E and has to be adequate for eligible consultancies. Further, the project guidelines (https://www.thegef.org/sites/default/files/documents/2025-10/GEF_C.70_Inf.18_Guidelines_Project_Program_Cycle_Policy_1_0.pdf) referenced state that "An analysis of past projects indicates that M&E budgets amount to, on average- 5% of the GEF-funded part of project financing for projects up to USD 5 million" given the average is 5% and there are no strict percentage requirements, we kindly request that the current amount be accepted.

WWF-GEF Agency Response (11.05.2025):

- Thank you for this suggestion. The Objective has been revised - with "places" now replaced by "freshwater ecosystems." The update in the objective description was addressed in the following; Project Summary and Project Description Table, Rationale, Project Description, Theory of Change, Annex C Results Framework, Gender Action Plan, Stakeholder Engagement Plan.

- Thank you for this note. In WWF GEF project evaluations, we continue to receive feedback that there is a need to allocate more resources to M&E. WWF-US standards are between 5-10% of project budget. The thought behind the Monitoring and Evaluation budget in this project considered that this is a multi-level project and is a direct response to requests from the involved country governments for adequate M&E funding. Funding for a mid-term and terminal evaluation must be budgeted under the M&E and has to be adequate for eligible consultancies. Additionally, 1% of the budget needs to go towards IW:LEARN activities, and is budgeted under M&E. Therefore, we request to keep the allocated M&E budget.

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

(9/16/2025) Yes, the rationale is anchored in the overall Freshwater Challenge and well articulated.

1. Please update the number of countries that have signed up to the FWC (and include the date as this is a moving/increasing number which is excellent to see).
2. Please describe the interest and support to the FWC by some champion private sector players (e.g. as seen at the Stockholm Water Week presentation).

(11/7/2025)

1. Addressed
2. Thank you. Addressed.

Agency Response

WWF-GEF Agency Response (11.05.2025):

- Thank you for this comment. This has been addressed with updated information on the active countries involved in the FWC- as of 10/27/2025
- The project will leverage the growing group of business supporters of the FWC. The Baseline section now includes the role of the private sector thus far in the development of the FWC initiative, and how the FWC "Business Supporter Program" was developed and continues to mobilize. In addition, there is language added on how the private sector will play a role during project implementation. We have also included a strategy for engagement of Private Sector in the stakeholder engagement plan which has been re-uploaded.

5 B. Project Description

- 5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?**
- b) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?**
- c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?**
- d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?**
- e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?**
- f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?**
- g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?**
- h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles**

adequately described within the components?

i) **Gender:** Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?

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

k) **Policy Coherence:** Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?

l) **Transformation and/or innovation:** Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

(9/16/2025)

Baseline and coordination opportunities:

1. The "global" level lists many relevant conventions, initiatives, frameworks etc. but provides no detail on how to compliment or cooperate at least with the most directly relevant ones of these players. Please address. (.e.g. I seem to recall that the RAMSAR COP explicitly mentioned the FWC in its outcomes).

2. At PIF it was recommended to liaise with STAP and also with the High Ambition Coalition during project design. Please add reference to this somewhere in the document.

3. Please briefly describe/recap the process and rational of selecting Brazil, Cambodia and Tanzania as case studies (building on the criteria outlined at PIF stage). Also, are there any policy inconsistencies that have been identified in these countries and would inform the target setting of these countries in the FWC pilots.

4. The sections in the section on cooperation list relevant ongoing initiatives in each country. Please mention what has been discussed and indicate *how* the project will or may cooperate and seek synergies with some of these initiatives. BTW - there seems to be a surprising lack/scarcity of mentioning relevant initiatives across Tanzania.

5. Please also note to not entirely mix baseline and cooperation opportunities. The latter belongs in the section on institutional set-up and cooperation. the Pakistan project on the other hand relates to comparative advantages of the IA and not to either. In the resubmission please consider where some of the information provided should be placed.

Project description:

6. First and second para - see comments provided earlier on the 'project summary' para.

7. ToC: please consider reversing the order of who the indicator and target setting supports. It should start from the FWC countries and their efforts to address identified challenges. This project will pilot this in three of the FWC countries which will also lead to inform the formulation of an indicator framework for the wider FWC allowing tracking and communication of progress and could inform development agencies/IFI in tracking impact and progress in their own freshwater portfolios.

8. Component 1: the description captures partners and opportunities with development partners, global reporting initiatives and the aim to include the private sector well. Please also assure that indicators will include consideration of and consultation with groups who often are not heard and their rights and roles not sufficiently captured in river and wetland restoration efforts such as women, IPLC representation, and youth. Please carry the role of these and other groups through all relevant project components.

9. Please also capture the need to work across sectors - as major water users/beneficiaries and as well as over-users/polluters are mostly outside the water sector perse. Furthermore, ministries of finance and development need to be made aware and consulted on the effort to voice their needs to be able to recognize the value of the FWC restoration efforts to country development goals and plans (esp. when piloting in the three countries). We note this is addressed in component 2, but strongly suggest to consider this not only in component 2 (target setting and application of indicators) but also component 1 (formulation of indicator framework).

10. Component 2: Please make the need for including *cross-sector* policy consistency in the gap analysis as well as consideration of IPLC rights and participation pathways (or the lack thereof). Ditto for gender.

11. Brazil - The effort seems ambitious given the size of the country. Please consider ongoing (and past) related activities and building on and not duplicating these (incl. the GEF funded Amazon related programs and projects). Would it make sense to be open to focus on specific states or sub-basins in 2.1? Only under 2.2 the description indicates focus on the S?o Francisco River Basin.

12. Cambodia: Please make clear that FWC target setting and setting up the FWC related freshwater indicator framework is clearly addressed. The rationale for the specific on the ground interventions mentioned under 2.1.2 is not well supported by the project's logic as described and needs to be better articulated (e.g. please also consider engagement on the impact of watershed degradation and large deforestation potential threats on the Tonle-Sap and related resources and livelihoods). Would it make more sense and contribute to the larger FWC initiative to support a process to set FWC targets and priority actions (incl. national policy and strategy reforms as well as identifying investments) around the Tonle-Sap and engaging relevant sectors and stakeholders in the process to identifying the core problems and threats as well as valuing and communicating the opportunities from maintaining the ecosystems services to people and the economy.

13. Tanzania - given the engagement of Tanzania for many years in environmental flow determinations of all its river basins and lots of investments in natural resource restoration and protection in the country, the background and understanding of the country baseline and stakeholders shown is surprisingly 'thin. Please strengthen in your re-submission. Somewhat similarly as above, please explain the rationale for the specific interventions suggested under 2.1.2 and how any analysis of policy incoherence across sectors and other drivers for degradation. Please make clear that S2S is used in the wider sense of lake management and its water sources.

14. Component 3 : please explore and describe synergies with IW:LEARN in the knowledge exchanges. Right now IW:LEARN is only mentioned in component 4 (Communication).

15. Component 4: Please make it more clear that the FWC target setting and tracking via agreed indicators is a communication tool for the value of freshwater of freshwater ecosystems to achieving country (and regional -> global) development goals and leveraging policy actions and investments in line with the overall ambition of the FWC (300.000 km of rivers and 350 mill ha of wetlands restored).

16. Please provide a better idea on how to engage the private sector especially in the country case studies (please be specific). The paragraph added on the private sector does not link clearly to the components and activities of the project and remains somewhat generic and global.

(11/7/2025)

1. Addressed

2. Noted.

3. Thanks for the detailed elaboration in the text.

4. The additional information on ongoing projects and how these may relate and complement efforts is well noted.
5. Noted. Addressed.
6. addressed.
7. Noted and addressed.
8. Addressed in the revised attached documents. Addressed.
9. addressed.
10. Addressed in the component and the GAP.
11. - 13. Addressed.
14. Addressed.
15. Well addressed.
- 16 Additional information on private sector engagement across the document is appreciated.
Cleared.

Agency Response

WWF-GEF Agency Response (11.05.2025):

- The paragraphs relating to global aspects of the Baseline opportunities have been elaborated to include further information on cooperation opportunities and mechanisms.
- Thank you for this suggestion. Background and context on the Freshwater Challenge project has been shared with the GEF Scientific and Technical Advisor Panel Member for International Waters for visibility and awareness on plans for a GEF project to support this global initiative. This has been included in the Baseline section. The STAP has advised the WWF GEF Agency that a formal review of the project will take place through the formal submission process. Additionally, FWC will continue to explore opportunities to engage with the HAC for People and Nature in the context of the CBD, noting that the HAC focuses on the terrestrial and ocean GBF protection target, while the FWC focuses on freshwater.
- The process and rationale for selecting Brazil, Cambodia and Tanzania as the three countries for demonstration activities in Component 2 has been elaborated in the text. Policy inconsistencies have been elaborated for each country in the baseline text section.
- Noted that the section seemed light regarding relevant initiatives. More information on the ongoing initiatives and coordination has been added in the Coordination and Ongoing Initiatives section, including details for Tanzania.
- Thank you for this note and we concur. Some projects referred to in the baseline section have been deleted (as also mentioned in the later cooperation opportunities section) and some have been moved. Additional baseline on the Policy and Regulatory framework in the 3 countries has been added.
- The earlier comments have also been incorporated in the mentioned paragraphs in the baseline section.

- Thank you for this comment. An arrow has been added to the Theory of Change diagram to indicate that the indicator and target development starts from the countries. Language has been revised to reflect this in Component 1 regarding the framing of the indicator framework. The indicator framework and tracking approach will be drafted as a result of countries working to identify and/or achieve their targets and their efforts to address challenges. Component 2 will feed into this, especially by target setting and identification of indicators for the selected demonstration areas, which can then feed up to inform national level efforts. Country achievements and lessons learned during implementation will also inform the development of the wider indicator framework by WWF-US in Component 1 with inputs from the FWC TA WG. WWF US will then pilot through Output 1.3 in the three countries. Project stakeholders will have the ability to consult on and refine the indicator framework before it is made available to the wider FWC membership for rollout.

- The wider stakeholder engagement including women, IPLC representation and youth has been summarized for each project Component. Note that this is explained in more detail in the Stakeholder Engagement Plan section "Stakeholder engagement per project component" and the Gender Action Plan (see the GAP table).

- The need for a cross-sectoral approach has been added to Component 1 (Output 1.1.1).

- This is noted. Cross-sector policy coherence has been added to Output 2.1.1, second Activity; Consideration of IPLC and gender rights and participation pathways added to 2.1.1 introductory text. Also added to Cambodia country text.

- Thank you very much for your review and suggestions in aligning the country activities with the broader FWC Initiative. The demonstration activities in Brazil now focus more strongly on the Sao Francisco River Basin - and in particular, the Velhas River sub-basin, building on the strong baseline of studies and well-established and operational Basin and Sub-Basin Committees. Further explanation is provided in the Project Rationale and in Component 2, whose text has been revised accordingly.

- Following consultation with the Cambodia project team, all three Outputs in Component 2 and associated indicators have been revised in line with these comments. Output 2.1.1 now follows a national approach aligned with FWC target setting and piloting the FWC indicator framework; Output 2.1.2 now focuses on policy, planning and institutional arrangements around FWC priorities for Tonle Sap Basin; while 2.1.1 emphasizes S2S communications. In general, ground-level community engagement, livelihood and habitat restoration activities have been removed in favor of higher level inputs aiming to leverage prioritization of freshwater conservation and restoration in subnational and national planning and investment. This change has also changed the safeguards categorization rating to be a category "c" or low risk, as it was determined at PIF stage.

- Following consultation with the Tanzania project team, the baseline for environmental flows, catchment management planning and related investments has been elaborated. The interventions planned under Output 2.1.2 and associated indicators have been revised, while the relevance of demonstration activities in Output 2.1.2 to Lake Tanganyika Basin have been elaborated and emphasized.

- Thank you for this comment. The need for coordination and potential synergies with IW:LEARN have been elaborated in the text for Component 3, including reference to training, twinning, participation in IW events, IW:LEARN Newsletter contributions and the IW:LEARN website toolkit.

- We agree that this is an important point in support of FWC communications and have incorporated it in Component 4.

- This has been revised. Opportunities for continued engagement with the Private sector, including details on the FWC Business Supporter Program, have been added to the baseline section and the Project Description. The Stakeholder Engagement Plan has also been adjusted.

Country inputs on opportunities for private sector financing have been added to Component 2 introduction, and private sector engagement in the Project Description.

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project

a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?

b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?

c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).

Secretariat comment at CEO Endorsement Request

. (9/16/2025)

1. Please include GEF as observer in the PSC given the global nature and significance of the project to the FWC which includes a wide number of GEF member countries. Please show the PSC in the organogram for the overall institutional arrangements.

2. The execution of the limited funds under 1.1.1. and 1.1.2 was approved by the GEF Programming Manager at PIF stage and is filed in the GEF Portal (note also the announcement of the GEF support to the FWC and its partners at the One Water Summit).

Please revise the justification section captioned below so that the dual role exception waiver request is based on one of the five Council-approved waivers (see page 8): i) Legislative or regulatory restrictions in the country on potential EEs; ii) Limited or inadequate fiduciary and / or procurement capacities in potential executing partners, as assessed by the GEF Agency; iii) Fragile and Conflict-affected Situations (FCS) and / or post-natural disaster situations; iv) Global or regional coordination child projects for Programs, global or regional platforms for knowledge sharing and Umbrella Enabling Activities for a group of countries; v) NGI projects.

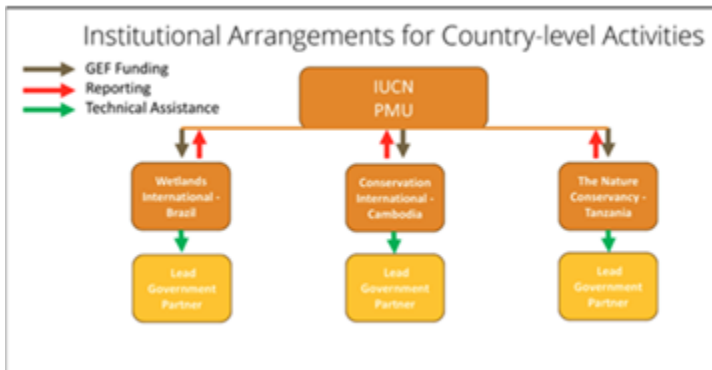
<p>Will the GEF Agency play an execution role on this project?</p> <p>Yes</p> <p>If so, please describe that role here and the justification.</p> <p>The proposal includes a self-execution function, which has been agreed with IUCN. The self-execution request is based on the existing governance structure and agreed technical capacities and roles of the FWC supporting coalition that was established in 2023. Roles within the Supporting Coalition are based on the expertise of each partner organization relevant to supporting the member countries. Therefore, the</p> <p>9/6/2025</p> <p style="text-align: right;">Official Use Only Page 53 of 88</p>

(for example: The justification for this exception is based on the policy amendment GEF/C.69/12, Annex III, paragraph 2 (h) (i), revised point iv, which allows exceptions for "Global or regional coordination child projects for Programs, global or regional platforms for knowledge sharing and Umbrella Enabling Activities for a group of countries".)

3. In this same section, please also include a statement that additional costs related to the Agency (WWF-US) assuming a dual role in the project will not be recovered from GEF project financing but rather from the co-financing and/or the Agency fee.

4. Please explain the seemingly large PMUs in the three pilot countries. Given that e.g. in the Tanzania organogram officers have names put to them, is it assumed that these are existing staff in the country offices of the respective FWC lead partners for each (e.g. WI for Brazil, CI for Cambodia, and TNC for Tanzania) ?

5. From the Institutional Arrangements section, it is not clear if - and if so - then how WWF, as GEF Agency and serving as partial EE, will participate at the country level in Brazil, Cambodia and Tanzania, as they are absent from the organograms:



Will the Agency (WWF) execute Outputs 1.1.1 and 1.1.2 in all three countries? This seems to be implied in the institutional arrangements diagram for the Global level. Please clarify WWF's roles as an EE throughout the section.

6. Please also clarify the other EEs roles (CI, WI, TNC) as "Global Executing Agencies" as per the individual country institutional arrangements diagrams. Will CI, WI or TNC have any executing role at the global level? Please clarify in both text and diagrams in this section and revise as needed.

7. Cooperation with other projects and initiatives: please provide *some concrete avenues* for cooperation with the main related non-GEF and GEF initiatives and projects (including the Amazon landscape IAP/IPs).

8. Please mention the linkages and intended modes of cooperation with interests and initiatives of existing FWC private sector partners.

(11/7/2025)

1. Addressed.

2. Addressed

3. Done. Addressed.

4. Thank you for that clarification. It would be useful to indicate positions that are fully or partially GEF MSP financed.

5. WWF is indicated on country level in the diagram for Brazil, but not in Cambodia or Tanzania unless the response is referring to the Country Technical Committee.

6. Please briefly explain the role of CI, WI and TNC on global level.

7. Addressed.

8. Addressed.

(11/19/2025)

4. Thank you for clarifying and clearly indicating the GEF funded positions in the budget and TORs.

5. Addressed.

6. Explanation and additional text noted. Addressed.

Agency Response

WWF GEF Agency Response 11.17.2025;

4. WWF GEF Agency Response; Thank you for this comment. Global positions fully funded by the GEF have been indicated in the budget and the TORs. At this stage, sub-grantee partners of the project who will report up to IUCN have not yet allocated funding across staff positions within their existing PMUs to determine which positions they will access funding from GEF for and which positions they will cover through co-financing.

5. Yes WWF Country Office in Cambodia was included in the "Technical Committee" in the institutional arrangements diagram. To address additional comments please see the updated institutional arrangements section. WWF is represented on the Country Technical Committee for both Cambodia and Tanzania. This has been clarified in the text, and WWF added to the Country Technical Committee in the diagram for Tanzania.

6. WWF GEF Agency Response; Text has been added to explain the roles of CI, WI and TNC in the "Global level" section - first as continuing core partners of FWC and PSC members; and then under the "Execution and Implementation" section, their activities at the global level to support project implementation are briefly explained. These include: participate actively in regular and ad hoc FWC partner meetings; support and participate in physical and online project workshops and events (e.g. the regional round tables); review project-produced materials; provide support to elevate project learnings and highlight national government and partner leadership in global and regional fora (such as UN Water Convention, CBD, UNCCD, Ramsar, UNFCCC COPs, etc); as well as other roles, as needed.

Please note, due to portal size restrictions one institutional arrangements diagram image was made Black and White to allow for submission

WWF-GEF Agency Response (11.05.2025):

- Thank you for this comment. Details on the self-execution policy alignment and justification have been added into the institutional arrangements section.

- Thank you for this comment. A statement addressing this has been added, noting that additional costs will be covered by Co-financing and/or agency fee.

- Thank you for this request. We welcome the GEF to be part of the PSC, both comments have been incorporated.

- We confirm that the FWC Core Partner organizations have existing programmes and staffing in each of the three pilot countries, which are reflected in the project management unit diagrams for each country. In order to preserve resources and avoid duplication of roles, the project will be executed by such existing FWC Core Partner staffing in each country. Text explaining that these are existing working staff has been included. In addition, the project will make use of any existing government structures such as the Country Technical Committee in Tanzania.

- At the country level, WWF country offices in the three pilot countries will participate in Country Technical / Advisory Committees on a voluntary basis (without any GEF project financing). The involvement has been added to the diagram on Institutional Arrangements at the Country Level.

- CI, WI and TNC do also have executing role at the global level. The roles of the Global Executing Agencies (CI, TNC, WI, IUCN and WWF) have been elaborated in the text on country level implementation arrangements and indicated in the diagram on institutional arrangements.

- Specific mechanisms for cooperation with the main GEF and non-GEF initiatives and projects have been added. Further information has been added to CEO ER for each country.

- Specific mechanisms for cooperation with the main GEF and non-GEF initiatives and projects have been added. Further information has been added to CEO ER for each country.

- Thank you for this feedback. Under each component, there are now clear linkages to the Private Sector in project implementation. There is no direct recipient of GEF funding that is a private sector partner that has been identified at this time; however, a private sector representative has been included in the PSC in the institutional arrangements diagram and related text.

-

5.3 Core indicators

a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?

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

Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

(9/16/2025)

1. Please explain how the indicators/sub-indicators for CI 7 were chosen (besides 7.4).

(11/7/2025)

1. Thank you for the explanation.

Agency Response

WWF-GEF Agency Response (11.05.2025):

- Thank you for your query. In each of the three pilot countries, the demonstration activities will seek to strengthen freshwater governance at the national or subnational levels through enhanced institutional arrangements that strengthen cross-sectoral coordination and influence international river/lake basin management. Project executing partners in each country led collaboration with governments to design and determine the indicators appropriate for their activities. The country

counter-parts then revised indicator targets based on the GEF review and the adjustments to country-level activities. Accordingly, GEF Core Sub-Indicator 7.3 has been selected in order to reflect these contributions.

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

. (9/16/2025)

1. Political and governance risks: please comment on the risks at local level incl. assuring the rights of IPLCs. Also, are there any specific local conflicts in the pilot areas that will need to be recognized and mitigated?
2. Financial and business: now that answer is a surprise ("The project does not include innovative financial or business models, so the risk is rated low.") . Would there not be an effort to identify finance opportunities for the initial pilot activities? This may have a larger impact than any select pilot interventions without a view of sustainability. All EAs have a strong background in this area.

(11/7/2025)

1. Addressed
2. Addressed.

Agency Response

WWF-GEF Agency Response (11.05.2025):

- The reference to local level risks, including the assurance of IPLC rights, has been revised in the Risk Table following feedback from the country partner organizations.

- The reference to innovative financial/business models has been revised in the Risk Table following feedback from the country partner organizations. They will work with the respective government agencies to leverage results of demonstration activities that prioritize FWC objectives for incorporation into national investment plans and proposals for additional / subsequent support.

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 RequestNA

Agency Response

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

6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?

Secretariat comment at CEO Endorsement Request

(9/16/2025)

Yes. The FWC challenge is large global initiative joined by currently 55 countries and the EU and addressing large river and wetland restoration targets, most of which will include areas and sub-basins of transboundary freshwater ecosystems.

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(9/16/2025) This is a global project. Activities to pilot the indicator framework in the three pilot countries are aligned with the country plans and policies.

Agency Response

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(9/16/2025) Yes

Agency Response

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request(9/16/2025) Yes

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

(9/16/2025) Yes

1. Please delete the sections on Fiji.
2. ?As per GEF Guidance, we request the Agency to integrate and align the activities developed at the GAP in Component 1, strengthening outputs 1.1.1 and 1.1.2, ensuring women?s organizations meaningful participation in these spaces, as well as gender-responsive frameworks and indicators.

(11/7/2025)

1. and 2. Addressed

Agency Response

WWF-GEF Agency Response (11.05.2025):

- The Fiji sections have been deleted from the GAP. The activities and recommendations in the GAP have been integrated as activities in Outputs 1.1.1, 1.1.2 and 1.1.3; and provided at overall Component level.

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

(9/16/2025)

1. The link to the Stakeholder engagement plan does not work and the file does not open. I only see the "stakeholder engagement overview" in the Portal. Please address.

(11/7/2025)

1. Addressed.

Agency Response

WWF-GEF Agency Response (11.05.2025):

- Thank you for this comment. The link has been reviewed and re-uploaded with the hopes of it functioning.

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request

(9/16/2025)

1. Please link the ESS to the Portal as Annex F. The PIF level ESS was updated and is now categorized as moderate risk.

2. We acknowledge the inclusion of a ?WWF Environmental and Social Safeguards Categorization Memorandum? that summarizes what ESS are triggered. Action: We request the implementing agency to fully include an ESS matrix with all the standards and their respective assessment, potential risks, potential mitigation measures and risk level.

3. In case it has not been considered in the Stakeholder Engagement Plan (as we could not access it), ensure that the project includes specific action for the meaningful inclusion of Indigenous Peoples and a potential Indigenous Peoples engagement plan (as applicable).

(11/7/2025)

1. Addressed.

2. The updated memo is uploaded and linked. Addressed.

3. Addressed.

Agency Response

WWF-GEF Agency Response (11.05.2025):

- After reviewing the activities under Component 2 in partnership with CI Cambodia and the government of Cambodia, the revised activities are no longer considered category "B" or moderate risk activities. The categorization now is "low" or category "C". In addition to the categorization memo, the SEP and the GA/GAP, a copy of the ESS Screening tool utilized by WWF GEF Agency has been uploaded, to remain confidential please

- The process to determine the categorization of the project included the screening of the project activities using a screening form. The screening form determined that the project activities are a low level ESS risk. The screening form has been attached for your information but should not be disclosed publicly.

- Thank you for this comment. The SEP includes details on the stakeholders to be included throughout project Implementation- to be found under Annex F. Additional language on this was added under Component 2.

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(9/16/2025) yes

Agency Response
Focal Area allocation?

Secretariat comment at CEO Endorsement Request(9/16/2025) yes

Agency Response
LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement Request

Agency Response
SCCF A (SIDS)?

Secretariat comment at CEO Endorsement Request

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

Secretariat comment at CEO Endorsement Request

Agency Response
Focal Area Set Aside?

Secretariat comment at CEO Endorsement Request

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

(9/16/2025)

1. Please explain why there are funds spent for "win mid-term review workshop"?
2. Please justify the large expenses for travel, meetings and workshops of 57 K. It would aid to itemize/separate these for each (Travel; meetings; workshop)

(11/7/2025)

1. Comment addressed, but Please note thought that now the amount spent (90,554.87) plus the amount committed (65,656.77) **should add up to 150,000.00. Please address.**

(11/17/2025)

1. Addressed. Cleared.

Agency Response

WWF GEF Agency Response 11.17.2025;

Thank you for this comment, this has been updated in terms of what is allocated. The total is 150,000 USD.

WWF-GEF Agency Response (11.05.2025):

- Thank you for this comment. More details on the funds spent during project preparation have been added, to note there were multiple international conferences that informed the project development process.

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 RequestNA

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

(9/16/2025)

1. Please provide and link the letters for WWF-International, Wetlands International, and FCDO.
2. Please split the co-finance from Brazil as per the letter into an in-kind and grant/investment mobilized component.
3. Please approach Cambodia and Tanzania for in-kind co-finance (e.g. via staff time) to demonstrate their interest and engagement.

(11/7/2025)

1. These are attached.
2. Addressed.
3. Noted.

Agency Response

WWF-GEF Agency Response (11.05.2025):

- Thank you for these notes. 1. The letters have been uploaded in the co-finance section. Previously they were uploaded in the "roadmap" section due to portal glitches so please disregard the duplicates. 2. The Brazil co-finance has been split per your suggestion 3. Despite continued discussions with Cambodia and Tanzania governments, it is difficult to obtain their commitments to co-financing for the project, however the NGOs working in country and receiving the GEF funding have provided their letters of co-financing that demonstrate co-financing for staff time, see Conservation International's new co-fi letter.

Annex B: Endorsements

8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:

Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?

Secretariat comment at CEO Endorsement Request(9/16/2025) yes

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(9/16/2025) yes

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(9/16/2025) yes

Agency Response

Annex C: Project Results Framework

8.6 a) Have the GEF core indicators been included?

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

correspond/are appropriate in view of total project financing (too high? Too low?)

c) Are all relevant indicators sex disaggregated?

d) Is the Project Results Framework included in the Project Document pasted in the Template?

Secretariat comment at CEO Endorsement Request

(9/16/2025)

1. yes, but we would encourage discussion with GEFSec on the rationale for the on the ground small scale activities in Cambodia and Tanzania. This has implications not only for CIs but 'ripples' through the RF.

(11/7/2025)

1. Addressed.

2. Please note that there are two Results Frameworks uploaded.

- Please delete the second one (which ends with component 3)

- Please under 3.1.1. Delete Fiji (not just strike through the country name!)

(11/17/2025)

Comments addressed.

Agency Response

WWF GEF Agency Response 11.17.2025;

WWF GEF Agency Response; Thank you for this comment. The second results framework has been deleted and the reference to Fiji removed.

WWF-GEF Agency Response (11.05.2025):

- After reviewing the activities under Component 2 in partnership with CI Cambodia and the government of Cambodia, as well as TNC Tanzania and the government of Tanzania, the revised activities are no longer small-scale activities on the ground but rather technical assistance activities that aim to build up the foundation for achieving FWC country targets and leveraging future funding that addresses identified national priorities for freshwater conservation and restoration.

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(9/16/2025) yes

Agency Response

Annex G: GEF Budget template

8.8 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?

b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?

c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement Request

(9/16/2025)

1. Please provide substantive detail on the sub-grants totaling over USD 2.2 million.
2. Please provide the TORs for the project manager. The TORs are mentioned in the budget notes but are not in the portal. Please indicate her/his technical versus coordination and management tasks and time spent.
3. Please provide TORs for the Finance and Admin officer, the M&E officer, the Communications and Partnership Officer, and the the Safeguards Officer. Please indicate staff time and budget paid from the project versus co-finance.
4. Please note that any project personnel roles that are proposed to be funded by both the PMC and project budget requires review and approval by the GEF Secretariat (ie, Project Manager, whose cost of more than 600K is extremely high, same for Communications partnership for more than 400K, which is extremely high).
5. Please revise the budget line "Travel for project management activities" which is currently charged to the project budget and not to PMC as it should be.
6. Please check the budget line "Travel for WWF Core Partner inclusion in regional events, trainings, roundtables" associated with budget note 15 " there are no funds included in the budget table for this item. It is also included under the cost category "Office Supplies" which is inaccurate and should be corrected. WWF as GEF Agency may use agency fee proceeds to attend project-related events like workshops " please refer to Table A - Activities Covered by the Agency Fee in the GEF Guidelines on the Project and Program Cycle Policy.

Please note: When resubmitted, we will review the budget again and provide comments if appropriate.

(11/7/2025)

1. addressed
2. TORs provided as well as work location in Bonn, Germany. This explains the budget (not salary) of USD 153,373 per year for this position.
3. TORs provided as well as work locations and percentage paid by the project.
4. We approve a split of budget for technical and project management tasks for the project manager.
 - The project Manager is an international position based in Germany and hence the budgeted staff costs of USD 153,373 per year is justified.
 - The Communications Officer is an international position based in Germany and hence the budgeted staff costs of USD 105,000 per year is justified.
 - **Please explain why the safeguards specialist would be out of Kathmandu/Nepal for this project?**
5. **This has not been addressed in the budget and is still budgeted via components instead of PMC.**
6. **Please delete the budget line for "Travel for WWF Core Partner inclusion in regional events, trainings, roundtables" and budget note 15.** There is no budget allocated to this budget line and WWF as GEF Agency should use agency fee proceeds to attend project-related events like workshops (see previous comment and reference to the GEF guidelines).

(11/19/2025)

4. Noted.

5. and 6. addressed.

(11/21/2025)

1. The budget table included in the Review Form is an image, not a word document - therefore, we cannot make calculations. Please provide/link a word document.

2. Now that we see additional details on the sub grants, we noticed that the agency has included PMU cost in the sub grants (see example for Cambodia pasted below). PMU costs should be exclusively charged to the PMC and not to the components. We need to understand the costs of each PMU in each country for calculating the total costs of personnel.

- > Please itemize these costs when resubmitting. That way GEFSEC is able to review the funds allocated to personnel.

The image shows a screenshot of a budget table. The header row is labeled "Expenditure Category". Below it, a row is highlighted in yellow, containing the text: "Sub Grant to CI for Cambodia Office for transportation, workshops, trainings, technical expertise, consultancies, & PMU unit in country to execute activities under Component 2 in Cambodia".

(12/11/2025)

1) On PMU costs, compared with the previous submission, the costs remained unaltered, which means that the costs of PMU were not removed. Please be explicit about the costs of these PMU and to (i) remove them, and (ii) inform where these resources will be allocated, which should not be to more personnel.

2) Salaries - The project manager(\$605,494), partnership officer (\$420,000), and finance and administrative officer (\$148,856 for part time) are still considered too high, even with the justification is that the positions are based in Germany. Please revise.

12/17/2025

1) Though the PMU Units were removed from the text in the budget table, compared with the previous submission, the costs remained unaltered, which means that the costs of PMU were not removed from subgrants. Please (i) remove the PMU costs from the subgrants, and (ii) inform where these resources will be allocated.

2) Regarding the high salary for the project manager(\$605,494), partnership officer (\$420,000), the finance and administrative officer (\$148,856 for part time), we still consider these very high, even if the justification (staff based in Switzerland) sounds reasonable. Please continue to find ways to decrease the high salaries.

12/18/2025

Addressed

Agency Response

WWF-GEF Agency Response 12.17.2025

1. Thank you for this comment. The sub-grants to sub-executing partners that previously mentioned PMU costs in each country have been reduced down for each partner, CI, WI and TNC. These funds have been removed from Component 2 funding and reallocated to cover; IW Learn event workshop costs, attending trainings and regional events, as well as more facilitation of side events at international event and twinning exercises.

2. Thank you for this comment. Please see the newly uploaded budget. There were multiple adjustments to salaries for PMU members; the new salary for PM has been reduced down from \$605,494 to \$540,081, and the Communications and partnership officer was reduced down from \$420,000 now to \$400,000. This is a complex global project where adequate capacity will be required for a Project Manager and Communications Specialist, therefore these positions will need to be adequately funded. The value of the U.S. Dollar has also decreased in the past months, making these salaries less competitive in an international forum.

WWF-GEF Agency Response 12.1.2025

1. Thank you for these comments. The budget was uploaded as a word document in the last submission, it is likely that the portal takes the contents and puts them into the portal body. Instead of uploading screenshots to the word document we have uploaded the actual budget table for your review-hopefully this alleviates the problem.

2. Reference to PMU costs has been removed from the sub-grants. There will be some personnel costs at the country level, yet to be determined, but we commit to keeping total project personnel costs to under 40%.

WWF GEF Agency Response 11.17.2025;

4. IUCN maintains a dedicated team of ESMS specialists across their offices globally. Considering the technical requirements and scope of the GEF FWC MSP, it was deemed most appropriate to nominate an ESMS expert from the IUCN Nepal Country Office to support and participate in the project's execution. This allows the cost for project staff management to remain reasonable and provides a closer connection to Cambodia and Tanzania than a specialist in Europe might.

5 & 6. The budget that was uploaded in word format is the newest budget for the latest submission. It is possible that the old budget was being viewed as it was not removed from the portal. The old budget has been removed so that only the word version can be viewed in which this was addressed.

WWF-GEF Agency Response (11.05.2025):

1. Thank you for this comment. Details for each output's activities and what the recipient organization plans to utilize funding for have been provided. The budget has been upload in a word document "A4" size per the guidance and specifications received from the ITSOP team for budget inclusion.

2. Thank you for this request. Please see the attached TORs for all project staff positions in the roadmap section of the portal. Detailed information on the amounts covered by co-financing per organization per position will be determined during project start up depending on the chosen incumbents for positions.

3. Please see the attached TORs for all project staff positions in the roadmap section of the portal. Detailed information on the amounts covered by co-financing per organization per position will be determined during project start up depending on the chosen incumbents for positions.

4. Please see the attached TORs for the project staff positions in the roadmap section detailing the staff positions which will be located in Europe (as staff members of IUCN) and will be responsible for a significant amount of delivering against the components.

5. Thank you for this comment. This has been revised in the budget

6. Thank you for this comment. This has been revised in the budget

Annex H: NGI Relevant Annexes

8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.

b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.

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

Secretariat comment at CEO Endorsement Request N/A

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1. GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

(9/16/2025) Please address comments and resubmit.

We already discussed most of the comments and please feel free to arrange another call if this could aid to clarify comments and resubmission.

Please also ensure that the resubmitted CEO Endorsement is appropriately formatted for publication; there are tracked changes remaining in the document that should be removed prior to resubmission.

(11/7/2025) Please address the few remaining comments and resubmit the MSP for approval. Please keep the cancelation deadline in mind and resubmit soonest.

(11/21/2025) Please address the comments on the budget and resubmit at your earliest convenience. Please take note of the Thanksgiving black-out period for reviews.

(12/11/2025) Please address two budget comments and resubmit asap.

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	9/18/2025	11/5/2025
Additional Review (as necessary)	11/7/2025	11/17/2025
Additional Review (as necessary)	11/19/2025	12/1/2025
Additional Review (as necessary)	12/6/2025	12/12/2025
Additional Review (as necessary)	12/18/2025	12/17/2025