

# Strengthening the protected area network for migratory bird conservation along the East Asian-Australasian Flyway (EAAF) in China

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10073

**Countries**

China

**Project Name**

Strengthening the protected area network for migratory bird conservation along the East Asian-Australasian Flyway (EAAF) in China

**Agencies**

UNDP

**Date received by PM**

5/22/2020

**Review completed by PM**

11/12/2020

**Program Manager**

Hannah Fairbank

**Focal Area**

Biodiversity

**Project Type**

FSP

**PIF**

**CEO Endorsement**

**Part I – Project Information**

**Focal area elements**

**1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF: Yes.

Agency Response

**Project description summary**

**2. Is the project structure/ design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

Please see questions on project's Theory Of Change (TOC) below.

July 31, 2020 HF:

Cleared

Agency Response

July 13, 2020 UNDP

1. See responses below

**3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?**

Secretariat Comment at CEO Endorsement Request June 15, 2020 HF: NA

Agency Response

**Co-financing**

**4. Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

1. NFGA \$65.32 million grant as investment mobilized-What exactly is this significant investment? Please describe in the CER how and why this is being categorized as IM.
2. Please submit a revised co-finance letter from Wetlands International that states the co-finance in US dollars rather than Euros.
3. Please re-check the uploaded co-finance letters document in the Portal. I was able to review, but currently when I click on the link to the uploaded document a pdf of the CER document opened (multiple times), rather than the co-financing letters document. May be a IT glitch. Thanks.

July 31, 2020 HF:

All comments cleared

November 17, 2020 HF:

1. WWF is not the GEF Implementing Agency for this project. Please categorize WWF as 'Donor Agency' in the co-financing list.
2. The co-financing letter from UNDP for \$200,000 is missing. Please include.

November 25, 2020 HF:

All comments cleared.

Agency Response

July 13, 2020 UNDP

1. Additional information from NFGA has been included in the CER as requested, with explanation of its categorization as IM (See Page 14 of the CER for details).
2. Wetlands International have provided an updated cofinancing letter stating a contribution of Euro 1,400,000 equivalent to **1,554, 532 USD** as of 25 October 2019 (see **Annex 12** of the ProDoc and Section C of the CER, page number 3). Cofinancing totals throughout the document package have been updated in view of the change in USD amount due to the different exchange rate applied by Wetlands International to that used for the original submission, all these changes are highlighted in yellow.

It was re-confirmed that the correct PDF document for Co-finance letters (**Annex 12**) is uploaded in the portal

November 19, 2020 UNDP:

1. As requested, table C of the CEO ER has been adjusted to categorize the source of co-financing from WWF as “Donor Agency”.

The co-financing letter from UND has been annexed to the package

#### **GEF Resource Availability**

#### **5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?**

##### Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF: Yes, though given what we know about wetland ecosystem service values in China, is it possible to calculate the total estimated value of ecosystem services expected to be protected (on an annual basis, or by geography) from this project? It would be really helpful to be able to describe the results of this GEF investment in those terms, e.g: **This project plans to invest \$10 million in GEF-7 funds and will result in the protection and continued provision of ecosystems services from wetlands and coastal areas of the EAAF valued at \$XXX million/year.** I would assume also that this number could be calculated based on both the direct hectares under improved management/in new PAs but also indirect benefits given the policy work it could have broader implications and the number would be bigger. Is this possible? This is particularly useful given the relatively modest hectarage targets for the project, but presumably much higher biodiversity and ecosystem values that will result from each hectare.

July 31, HF:

Excellent-thank you. Comment cleared.

Agency Response  
July 13, 2020 UNDP

The total economic value of three project demonstration sites and the expanded network of EAAF wetland protected areas has been estimated based on a current published analysis (Sustainability 2020, 12, 3131; doi:10.3390/su12083131). The information is presented in the section on Global Environmental Benefits (see CER page number 24 and ProDoc page number 25 for details).

**Project Preparation Grant**

**6. Is the status and utilization of the PPG reported in Annex C in the document?**

Secretariat Comment at CEO Endorsement Request June 15, 2020 HF: Yes.

Agency Response  
**Core indicators**

**7. Are there changes/ adjustments made in the core indicator targets indicated in Table E? Do they remain realistic?**

Secretariat Comment at CEO Endorsement Request  
June 15, 2020 HF:

1. There has been a shift in hectares that has resulted in a change in geography (previously discussed with the PM and justified in a letter from the NFGA) but the hectares target has increased and those hectares are of commensurate or great value than previous.
2. It looks as if there are 18 candidate sites for PA creation/gazettment under Component 1, but the CER and ProDoc state that these sites have not yet been screen/selected/finalized and that there will be a process for doing so based on criteria etc. Given this project is at CEO endorsement stage, we would expect that the project sites would have been vetted, screened and decided upon during PPG. This is needed in order to set accurate targets for core

indicators, plan for project activities and undertake appropriate social and environmental safeguard screening (see risks section). Please work with project proponents to determine the PA expansion sites for this project and include plans for these sites, including core indicator targets in the CER/ProDoc for resubmission of this project.

July 31, 2020 HF:

1. Comment cleared.
2. Thank you for this further information about the process, current reforms and restrictions. Regardless, if the project intends to work in the 18 selected sites, please set and include core indicator targets and METT scores/targets for each as required. Please note there is a section of the METT focused specifically on PA establishment/gazettment which is certainly applicable if that is included in the plans for these sites.

November 2, 2020 HF:

Comment cleared.

### Agency Response

July 13, 2020 UNDP

1. No response required
2. NFGA has provided additional information concerning the process for identifying, confirming and gazetting the proposed PA expansion sites (see letter from the NFGA **in Annex 26**), as follows:

The revised Project Document and CEO Endorsement Request responding to this review include the proposed list of 18 sites totalling 204,974 hectares (the total has been revised, following stakeholder inputs provided after submission), consistent with the target stated in the PIF. The rationale, methodology and criteria for their selection have been described fully in Project Document Annexes 21A “Flyway PA System Gap Analysis” and the updated Annex 21B “Proposed Sites for Flyway PA System Expansion”.

In brief, to achieve the project target of 200,000 ha PA expansion by the end-of-project, the Project Preparation team first identified a total of 276 priority sites that are important habitats for migratory waterbirds. Among these, 49 are currently not part of the Protected Area (PA) system. The proposed 18 sites were selected from these 49 sites based on the Flyway PA System Gap Analysis (Annex 21A), probable impacts on the local communities (See Annexes 4 “Social and Environmental Procedures [SESP]”, 7 “Stakeholder Engagement Plan”, and 8 “Environmental and Social Management Framework [ESMF]” of the Project Document for details), as well as on the willingness of local governments and NFGA to prioritize these sites for gazettment during project implementation in full adherence to new rules and regulations emerging from the ongoing national PA system reform process.

NFGA has experienced two main challenges that have constrained the finalization of the 18 expansion sites during the PPG, as follows:

First, the GoC is currently undertaking the PA Integration and Optimization Action Plan as mandated by the official “Guidance Document on Establishing Natural PA System Taking National Park as the Main Body” issued by the General Office of the Central Party Committee and the State Council on June 2019. The Action Plan aims to address structural issues that hinder effectiveness in the management of the existing PA system, including acute overlapping of PAs, inconsistency and duplication of PA categorization, and lack of clarity about PA management responsibilities between government agencies and/or levels, amongst other critical issues. The expected date of completion of the Action Plan is December 2020. Therefore, a more detailed site level screening of PA expansion sites can only begin after the Action Plan is concluded and structural issues of the PA system described above are addressed.

The second challenge is time related. The PA system reform regulations determine that proposals to establish new PAs must originate from the Provincial Government. This process involves extensive government-led multi-stakeholder consultations that typically would take up to two years – which is consistent with similar processes in European countries for example. The consultations under this new regime have not yet taken place and can only be initiated once the PA Optimization Action Plan is concluded. A description of this process is given below.

Regarding the concern about social and environmental screening, the NFGA and other project partners will fully adhere to the ESMF of the Project (See Annex 8 of the Project Document for details), including the requirement to avoid the expansion or establishment of Protected Areas that involve relocation of local communities and/or ethnic minorities. Accordingly, the NFGA, together with relevant Provincial government agencies, will replace any candidate sites with appropriate alternative sites of equivalent area and GEBs in the event that any of the 18 pre-screened proposed sites did not meet this requirement.

First, we wish to provide some background regarding the change of mandates on protected area (PA) management during the institutional reform in 2018. A number of ministries, e.g. Forestry, Environmental Protection, Agriculture, Ocean, Housing and Urban-Rural Development, Water Resources and Land Resources, each had the mandate to set up new PAs before the reform. However, after the institutional reform, the mandate to set up new national level PAs was centralized to NFGA, and the mandate to set up local level PAs was centralized to provincial departments of forestry/grassland/natural resources. At national level, the NFGA is supervised by the Ministry of Natural Resources, and at provincial level, most of the Forest and Grassland Administration (FGA) is directly supervised by the provincial governments, while some are supervised by the Provincial Departments of Natural Resources, and in Shandong Province there is no FGA and the PA management mandate is under the Provincial Department of Natural Resources. The same institutional structure for PA management is similar to that at the provincial level.

During the transitional period since the institutional reform when all the PAs managed by other ministries were being handed over to NFGA, the process to set up new PAs was actually suspended and currently all the forestry/grassland/natural resources departments at different levels are busy with PA Integration and Optimization Action, aiming to solve the problems of the existing PA system such as overlapping with each other and management by different departments responsible for the same PA. This action will be finished by the end of this year and the process to set up new PAs will be expected to restart from next year.

At present, there are many different names for the existing PAs in China such as national park, nature reserve, scenic spot, forestry park, wetland park, geological park, marine park, special marine nature reserve, aquatic genetic resources nature reserve, grassland park, desert park, glacier park and hydraulic engineering scenic park. In addition to national and provincial level PAs, there are also many prefectural and county levels PAs. After the completion of the ongoing PA Integration and Optimization Action, there will be only three types of PAs including national parks, nature reserves and natural parks, just at national and provincial levels. There will be no prefectural and county level PAs after this Action.

The processes will be different to set up a new national park, a nature reserve or a natural park. However, NFGA has not yet issued an official rule on the specific steps to set up a new PA. Based on experience to date, the process to set up a new provincial level Nature Reserve (NR) usually includes the following steps (the process for establishing a new national park should be more complicated and the process for establishing a new natural park should be simpler):

**Step 1:** Making a proposal to set up a new NR by the local department of forestry/grassland/natural resources (usually at county level, sometimes at prefecture level if the proposed NR is transboundary among different counties) based on the initial assessment on the conservation value of a certain area. Such an initial assessment is usually made by specialists who have visited there for some reasons. (one month)

**Step 2:** The local department of forestry/grassland/natural resources will contract a technical entity such as a university or an institute of the Chinese Academy of Sciences to compile a *Comprehensive Scientific Survey Report* of the proposed NR. This requires extensive field work usually over a one year timeframe to collect the information and data related to the proposed new NR on geographic conditions, plants, animals, natural resources, environmental conditions, and social economic conditions. (one year)

**Step 3:** After the *Comprehensive Scientific Survey Report* is produced, the local forestry/grassland/natural resources department will contract a technical entity to develop a *Master Plan* for the proposed NR. The *Master Plan* includes the boundary description and functional zoning; planning objectives, timeframe, principles; plans on conservation and management, scientific research and monitoring, public education, ecotourism, capacity development, community co-management and infrastructure development; investment estimates and benefit assessment; and required enabling conditions. (six months)

**Step 4:** The local department starts the consultation process through sharing the *Comprehensive Scientific Survey Report* and the *Master Plan* to all related government departments and local townships/villages/communities, and other stakeholders for comments. (three months)

**Step 5:** If basic consensus has been reached, the local department will send an official application report to the Provincial Department of forestry/grassland/natural resources. The Provincial Department will send two specialists to the proposed NR to make an on-the-spot inspection on the feasibility to set up a new NR. The two specialists should prepare an inspection report on the strengths, weaknesses and possible risks to set up a new NR and probably the report will basically support the establishment of a new NR. Then the Provincial Department should organize a technical review meeting on the *Comprehensive Scientific Survey Report*, the *Master Plan*, and other application materials, with at least five specialists participating. If the review meeting approves the application documents, then the Provincial Department of forestry/grassland/natural resources will publicize the key data of the proposed NR (e.g. its area, boundaries, location and management zoning). (3 months)

**Step 6:** If there are no objections during the publicity period, the Provincial Department of forestry/grassland/natural resources will send an official document to the provincial government to request the formal gazetting of the new NR. The provincial government will gazette the new NR after internal formalities. (one month).

In summary, it will normally take about 22 months to gazette a new NR. Sometimes the process is shorter and sometimes longer depending on the time to solve any disputes. With respect to the 18 sites identified in the PPG period, only Step 1 has been completed in the last year and it was impossible to carry out the subsequent steps because all the processes were suspended until now since the institutional reform in 2018. NFGA will start the remaining steps from next year (2021) once the door to set up new PAs has been re-opened. During project implementation, NFGA will try to identify more potential sites for PA expansion to ensure that the PA expansion target of 200,000 ha will be achieved or even over-fulfilled.

In addition to the above, a table on Proposed new protected area sites of global significance for EAAF migratory waterbird conservation has been added to the ProDoc (See page numbers 31 to 33 for details) and CER (See page numbers 36 to 38 for details).

#### September 8, 2020 UNDP

METT baselines and targets have been provided for the 18 proposed new PAs in Annex 11B as requested. Because none of these sites currently has any existing protection or active management, and have not undergone government led baseline inventory surveys, the datasheets are largely incomplete at this stage, but baseline and target scores have been proposed. These scores have not been included in the GEF Core Indicator Worksheet, as the sub-sections for newly created PAs (i.e. Sub-Indicators 1.1, 2.1) have no columns for entry of METT scores - only for existing PAs under improved management (1.2, 2.2).

Additional text to reflect this was included in the Results Section of the ProDoc and CER (See page numbers 30 and 31 of the ProDoc and page numbers 34 and 35 of the CER for details).

#### **Part II – Project Justification**

##### **1. Is there a sufficient elaboration on how the global environmental/ adaptation problems, including the root causes and barriers, are going to be addressed?**

#### Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF: The inclusion of conceptual model, theory of change, assumptions and log-frame is helpful in understanding the conceptual basis for this project. A couple of clarifications:

1. What are the “levels” referenced at the top of Table 5B in the ProDoc?
2. Please ensure that the CER contains a complete narrative (if not graphic) outlining the TOC for this project, including how what the project proposes will address the drivers and threats to wetland/migratory bird loss in EAAF.
3. Please see question regarding monitoring critical assumptions as an important monitoring approach given the projects TOC.

July 31, 2020 HF: All comments cleared.

- 1.

## Agency Response

July 13, 2020 UNDP

1. The levels referred to in Table 5B have now been labelled, reflecting (L-R): 1 Current Situation, 2 Outputs, 3-Outcomes, 4-Project Impacts (See Figure 5B, TOC Diagram, page number 16).
  2. The TOC has been elaborated including relevant supporting figures and tables from the Prodoc (See CER page numbers 9 to 18).
  3. See response to the later question referred to under the section on monitoring and evaluation below.
- 2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?**

## Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

1. Please include a synthesis of the baseline projects and scenario to begin this section of the CER to put this project in context and provide a foundation for the GEF increment. A complete baseline analysis is included in the ProDoc so please reflect some of the key points/content in the CER.
2. Corrections/updates to the end dates of CPARs 3, 4, 5, 6 in Table 4 of Annex-19 are needed.

3. Annex 19 page 14-15: **Prior-GEF investment** in wetland/migratory bird conservation in China should include some analysis of what was achieved and how this project will build on that (rather than be redundant).

current GEF Flyway project in Southern China Coastal Areas.

**Table 4. Six projects of CBPF China's Protected Area System Reform (C-PAR) Program (GEF-6)**

Project Title	GEF IA	GEF EA	Project start and end dates	GEF Budget(USD)
1. China's Protected Area Reform (C-PAR) for Conserving Globally Significant Biodiversity (with coordination functions)	UNDP	FECO	1 Feb 2019 to 30 Jan 2025	7,000,000
2. Enhancing endangered species conservation through reducing threats and PA system strengthening in Gansu	UNDP	Gansu Forest Department	1 Jan 2018 to 31 Dec 2024	3,000,000
3. Strengthening the PA system in the Qilian Mountains-Qinghai Lake landscape	UNDP	Qinghai Forest Department	19 Jan 2019 to 18 Jan 2024	3,000,000
4. Strengthening Marine Protected Areas for Chinese White Dolphin Conservation	UNDP	NFGA	Dates not fixed	3,000,000
5. Expanding the coverage and strengthening the management of wetland protected areas in Sichuan Province	CI	Sichuan Forest Department	Dates not fixed	3,000,000
6. Building Sustainability into PA reforms to Conserve Globally significant Biodiversity in China	FECO	Chinese Research Academy of Environmental Sciences	Dates not fixed	2,000,000
<b>Total</b>				<b>21,000,000</b>

4. Correction to duration years of 14<sup>th</sup> 5-year plan in Annex 19 para #85 is needed.

**85. Recommended project interventions based on the capacity development scorecard:**

- Issue 2: The GEF Flyway Project may include related studies related to Wetland Conservation Law to provide strong policy support to NFGA on the legislative study on wetland conservation.
- Issue 3: In 2020, the NGFA will start next round of wetland conservation planning for 14th Five-Year Plan (2001-2005), so the GEF Flyway project may actively support the planning process.

July 31, 2020 HF:

- 1.) Comment cleared.
- 2.) Please update period of project performance for CPARs 5 & 6 as both have approved CERs.

5. Expanding the coverage and strengthening the management of wetland protected areas in Sichuan Province	CI	Sichuan Forest Department	Dates not fixed	3,000,000
6. Building Sustainability into PA reforms to Conserve Globally significant Biodiversity in China	FECO	Chinese Research Academy of Environmental Sciences	Dates not fixed	2,000,000

3.) Comment cleared.

4.) Comment cleared.

November 2, 2020 HF:

Comment cleared.

#### Agency Response

July 13, 2020 UNDP

1. A synthesis of the baseline scenario for the three project components has been added at the start of this section as requested (See CER page numbers 19 to 21).
- 2, 3 & 4. Annex 19 has been revised accordingly to address these comments (See Annex 19, page numbers 14, 15 and 33 for details).

September 7, 2020 UNDP

2) CPAR5: 2019.05-2024.05; CPAR6: 2019.10.24-2024.9.30. This information has been included in the documents (See ProDoc page number 58 and CER page number 24).

**3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?**

Secretariat Comment at PIF/Work Program Inclusion

June 15, 2020 HF:

1.) The first sentence references a “child project concept.” Please correct as this is not a child project, and it isn’t at concept phase. Also, please ensure that the content of this CER is current and not a hold-over from when this project was proposed as a PFD and CPs in GEF-6.

2.) This section of the CER [ 3.) ] is focused on an explanation and justification for the inclusion of the Liao River Estuary in place of the Zhanjiang NNR. Thank you for the comprehensive information. What is missing here though is a description of the “proposed alternative scenario” for this project, now at CER phase. Please include a complete description of the proposed alternative scenario.

3.) Please provide a description of each of the project outcomes that contextualizes and describes that outcome in the GEF CER. It should also clearly explain how that Component/Outcome fits together and relates to the other project Outcomes to achieve the Project Objective. Currently this section just includes a bulleted list of outputs, but lacks any real description of the project component outcome. The ‘whole’ needs to be ‘greater than the sum of its parts’ as they say, right now we are missing the ‘whole’ of these components and how they add up to the objective. Could consider taking discussion of Project Objective and Components/Outcomes that is included in the GEBs section and move it to the expected results sections to provide an overview/context for the results listed. Additionally, each of the activities should include a brief discussion of the how/what is actually planned. The level of detail at CER given the size of this investment is insufficient, thank you for revising.

4.) Outcome 1: What is envisioned for the “national coordination mechanism” described here?

Strengthened financial sustainability: How does this project contribute to PA financial sustainability at the national level? Please include a more complete picture of this outcome/component in the CER. What are the potential strategies to close a very significant funding gap (\$770 million-\$2.5 billion/year)? Given the economic value of wetlands in China how will increased public funding or eco-compensation schemes enter into PA sustainable financing. How coordinated with CPAR-6 on sustainable financing of PAs?

5.) Outcome 2: Recommend revising/renaming the title of this outcome-unclear what is the focus, intended result based on current language.

6.) Outcome 3: One of the results of this outcome is a handbook for development of PA management plans. Doesn’t a handbook/guidelines on the development of PA management plans already exist in China? It seems like this is something that should be done at the national-level and rolled-out/adapted for use at the local level. Is this what is proposed? Is the CPAR program, Paulson or others already supporting such an effort?

7.) Please use an alternative source of funding for proposed remediation/restoration of oilfield as this shouldn’t be funded with GEF BD resources (budget item 12 E).

	<b>Total: \$2,000,000</b>
<b>12E</b>	<b>Contractual Services – Companies/Institutions: Subcontract(s) for:</b>
	i) technical support and pilot development of technical guidelines on ecological restoration for the progressive removal of <u>Liaohé</u> Oilfield from the core, buffer and part of the experimental zone of <u>Liaohé NNR and PNR</u> ; \$80,000 (3.3.2)
	ii) and for pilot restoration of wetland habitats in former oil field areas as the Sheng Li Oilfield progressively removes all production facilities in the <b>Yellow River Delta</b> NNR core and buffer zones and some from the experimental zone; \$80,000 (3.3.7)
	iii) Conduct national workshop to review the results of restoration pilots and the draft technical guidelines, including experience from other nature reserves / oilfields \$30,000 (Output 3.3)
	<b>Total: \$190,000</b>

July 31, 2020 HF:

1.) Comment cleared.

2.) Comment cleared. Having said that, the response to comments 2 and 3 went a bit too far. We are looking for something between a bulleted list and pages of text. The CEO endorsement request should be a stand-alone document that allows the reviewer to easily read and understand the topic of the section (for instance: alternative scenario, baseline etc) without providing in-depth details and discussion that is available in the ProDoc. These responses seem to have been copied and pasted wholesale rather than refined/crafted to fit into a CEO endorsement request-as are the responses to some of the other similar comments. What we are going for throughout the CER is 'brief' but complete enough to understand (rather than the whole extent of the ProDoc text).

3.) Comment cleared. See #2.

4 to 7.) All comments cleared.

## Agency Response

July 13, 2020 UNDP

1. Edits to this section of the CER have been made as requested (See page number 25 of the CER).
2. The full project alternative has now been included in the CER (See page numbers 29 to 56).
3. As suggested, the Project Objective and Components/Outcomes formerly below the GEBs section have been moved to the expected results section (See page numbers 29 to 56). In addition, much greater detail has been added to the project alternative section in response to the above point, including outputs rationale and indicative activities (See page numbers 29 to 56).
4. NFGA has provided the following further explanation of the 'national coordination mechanism', and the relevant text of the GEF Project Alternative has been updated accordingly and a new activity added to Output 1.1: Approved by the State Council, China's National Committee for Implementing the Ramsar Convention was established in 2007 with 16 member agencies, chaired by the NFGA and co-chaired by 5 ministries including the Ministry of Foreign Affairs, the

Ministry of Water Resources, the Ministry of Agriculture, the State Environmental Protection Administration and the State Oceanic Administration[1]<sup>1</sup>. This Committee holds annual meetings to review the achievement and problems in fulfilling the Ramsar Convention in addition to routine communications among the member agencies to coordinate related work. Thus, a national coordination mechanism exists, and this project would aim to promote migratory waterbird conservation as one of the priorities of the Committee. In its annual meetings, an update on progress of this project would be included in the agenda, and Committee members organized to conduct field inspections of the project sites during implementation so that the Committee can facilitate the upscaling and replication of the project results to other sites and regions in China (See page numbers 10, 29, 32 and 57 of the CER and pages 27 and 28 of the ProDoc).

Regarding strengthened financial sustainability, please refer to the more detailed text now included in the CER for Output 1.2. Activity 1.2.2 specifically addresses the systematic removal of remaining policy and fiscal barriers to the sustainable financing of the national wetland PA system (as described in Prodoc Annex 23A) in coordination with CPAR Project 6 (Building Sustainability into PA reforms to Conserve Globally significant Biodiversity in China) through a Task Force on Sustainable Financing for flyway wetland PAs, including:

- The Regulations of the People's Republic of China on Nature Reserves – to clarify the accountability of government finance at each level for funding allocation in wetland legislation;
- Provisions of the NFGA on Wetland Conservation and Management – to promote the adoption of the provisions into the laws or regulations of the P.R.C.;
- Guidelines of the General Office of the CPC Central Committee and the General Office of the State Council on Establishing the System of Natural Reserves with National Parks as the Main Body – to clarify the details of the reform scheme regarding wetland PAs financial sustainability; and
- The Guidelines of the General Office of the CPC Committee and the State Council to Coordinate in Promoting the Reform of Property Rights System of Nature Resource Assets – to clarify the details of the reform scheme regarding wetland PAs financial sustainability, such as concessions.

See CER, page number 39 for details.

5. Thank you for the suggestion – we have included the following Outcome title as a simpler and clearer alternative: *Flyway wetland conservation advanced through strengthened legislation, planning and sector mainstreaming (see ProDoc page numbers 15, 29, 34, Annex 3, and CER page numbers 12, 30, and 40)*

6. Please note that handbook/guidelines on the development of PA management plans are not available in China, and they are not fully endorsed and implemented by the NFGA, even though some GEF projects have supported some selected PAs to develop the PA management plans. Due to the PA reform, new handbook/guidelines are needed to be developed at the national level, especially for wetland PAs, and adapted for use at the local level. The CPAR program, Paulson or others have not supported or are supporting such an effort.

7. These activities have been revised and now the project will not conduct any GEF-financed restoration work in former oilfield areas (See the ProDoc budget section, page number 101).

---

[1] Note - the members of the National Ramsar Committee have not yet been updated following government structural reforms. The NFGA Department of Wetland Management will start the updating process in July 2020, which will take a few months.

**4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF: Yes.

Agency Response

**5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

1.) Please complete this section with full description of the project's incremental/additional cost reasoning and expected contributions from baseline and co-financing. It is not enough to say that it hasn't changed since PIF. The CER should be a standalone document.

July 31, 2020 HF:

1.) This section of the CER should articulate the incremental reasoning for the project, and "contributions" (to be understood as "progress") from the baseline. The table is helpful but what is needed here is a clear articulation of the incremental reasoning for the project overall. What is the GEF increment here that builds on the baseline to deliver globally significant biodiversity GEBs? What is this "additionality" from baseline that the GEF is paying for (versus what the Chinese government would be doing otherwise). The table can remain, but a clear project-level articulation of the project's incremental reasoning is needed. Also, please redact the baseline information from Annex 19 as this is redundant. Good news on the co-financing increases.

November 2, 2020 HF:

All comments cleared.

Agency Response

July 13, 2020 UNDP

1.) This has now been elaborated, including a new table summarizing the incremental reasoning for each project component (See CER page numbers 56 to 64).

September 7, 2020 UNDP:

1.) Please see the additional text that has been included to elaborate this section of the CER (See page numbers 58 and 59 of the CER for details). The baseline information taken from Annex 19 has been removed as requested.

**6. Is there further and better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

1. Please complete this section of the CER document (1.a). The CER should be a stand-alone document for review but it is currently incomplete.
2. Annex 21 B-Appendix 2 titled "Proposed New PAs vs National or Provincial Level Important Wetlands" could you please explain this table, the yellow highlights and how it relates to project sites? Further, how it takes into consideration globally important sites, which is how GEF resources should be used. In addition, it looks like two of the sites are artificial wetlands, please describe this proposed site and provide justification for including this site in the project scope given the GEF focus on globally important biodiversity-presumably the justification is that these artificial wetlands important due to the use of them as stop-overs/feeding/nesting sites for migratory birds rather than biodiversity priorities in their own right. Please describe.

July 31, 2020 HF:

- 1.) Comment cleared.
- 2.) Comment cleared.

Agency Response

July 13, 2020 UNDP

1. The full statement of global environmental benefits has been included here as requested (See CER page number 62 and 63 for details)

2. The purpose of the table in Annex 21B-Appendix 2 is to show the current level of recognition in national and provincial government plans/ policies of the 18 proposed new sites for inclusion in the national PA network. The title of this Appendix has been changed to provide further clarity. Its new title is: *Appendix 2: Status of Proposed New PAs as officially nominated National or Provincial Wetland Parks.*

All 18 sites in Appendix 2 meet the government criteria for national and provincial wetland parks, and so far, five of these have been nominated as provincial wetland parks by NFGA (the yellow highlighted sites). So far none of them have been actually designated as NWPs or PWPs (so they remain unprotected).

All 18 proposed sites meet the Ramsar Convention's criteria for internationally important wetlands based on their use by migratory waterbird populations. This is clear from Annex 21B Table 1, which lists the globally threatened migratory waterbird species occurring at each site, as well as those migratory waterbird species that occur in internationally significant numbers (1% of their global or biogeographic population) in line with the Ramsar Convention and EAAFP Flyway Site Network criteria.

Helong Reservoir in Liaoning Province and Sizaopu Reservoir in Zhejiang Province are artificial wetlands. Both are of international importance for migratory waterbirds, as indicated in Annex 21B Table 1 - both support internationally important numbers of several migratory waterbird populations: Helong Reservoir regularly supports more than 1% of the flyway population of Bar-tailed Godwit, Dunlin and Grey Plover; and Sizaopu Reservoir the same for Dunlin and Kentish Plover.

**The criteria and procedures used to identify the proposed new protected areas are as follows:**

1. **i) The proposed sites are of international importance for waterbird conservation**, meeting the Ramsar criteria, Important Bird Areas (a subset of the global system of Key Biodiversity Areas) as well as the EAAFP Flyway Site Network criteria. The sites' importance was evaluated by the importance index in **Annex 21B**. It should be mentioned that the process of KBA identification in China is very incomplete, therefore many sites that would meet internationally accepted KBA criteria are not yet listed in China and therefore do not appear in Appendix 1 of **Annex 21B**.
2. Details of the criteria used are as follows:
  1. Regular presence of a single individual for Critically Endangered (CR) and Endangered (EN) species; presence of 30 individuals for Vulnerable species (VU) according to IUCN red list category

*Source: Criterion 2 for identifying Ramsar sites (Ramsar Convention Secretariat, 2010); Criterion A1 to determine Important Bird Area (Fishpool and Evans, 2001)*

2. Population exceeds 1% of flyway population (hereafter Ramsar 1% criterion)

*Source: Criterion 6 for identifying Ramsar sites (Ramsar Convention Secretariat, 2010); Criterion A4 to determine Important Bird Area (Fishpool and Evans, 2001)*

3. Supports 5,000 or more waterbirds

Source: Staging criteria for East Asian-Australasian Flyway (EAAF) Partnership (<http://www.eaaflyway.net>)

**3. ii) The sites represent existing conservation gaps or are not well protected;**

We overlaid the priority sites with the existing protection areas distribution maps and got the potential list of new Protected Areas extension.

**4. iii) The sites will be considered or related with the government's ongoing planning for wetland conservation strategy.**

5. Among the potential list of new Protected Areas, we have fully consulted the National Forestry and Grassland Bureau and the demonstration provinces. Sites for compliance with the relevant ongoing planning in wetland conservation strategy were taken into consideration firstly. Such as the National or Provincial Important Wetland in China which issued by NFGA, as well as the Ecological Redline of Wetlands Mapping by China Central Government. Therefore, we reviewed and checked the list with the potential PAs list with the list mentioned above and got the final list.

Further explanation of the methodology used to identify the proposed new PA sites of global importance for EAAF migratory waterbird conservation, and a table summarizing the characteristics of the proposed sites have been added to the narrative description of Output 1.1 of the GEF Project Alternative (See ProDoc page numbers 35 to 40) .

**7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

- 1.) The CER states: “the project will also develop the concept of model PAs for migratory water birds, putting in place a specific approach for managing PAs for the sensitive needs of migratory water birds.” How will this ‘specific approach’ be institutionalized, scaled-up, applied beyond the particular PAs in this project? To the national level, the international level? Need to have a broader impact. Please address in the CER/ProDoc.
- 2.) In addition to policy, this section of the CER should include a complete discussion of the financial sustainability results expected from this project given it is a key outcome/result of the investment. What is meant by “remove barriers towards addressing the financing gap”? Also, please address the approach to sustainability of project capacity-building efforts, citizen engagement/awareness etc. in the CER/ProDoc.
- 3.) Given the project support for gazettelement of PAs this should be addressed in the approach to social sustainability in the CER/ProDoc.

July 31, 2020 HF:

1.) Please address the sustainability and institutionalization of capacity building and training efforts (e.g. where will the curriculum housed and how will it be offered and updated beyond the project period? Is a training of trainers approach being taken? And a financing plan being put in place to support it over time?) This is of particular concern given the investment of past projects (as noted) in training/capacity building.

2.) Comment cleared.

3.) Comment cleared.

4.) Given the heavy reliance on "contractual services" in the budget (particularly Component 2) please provide further explanation for how the services and capacities will be institutionalized at the national, provincial and site levels once the project period has concluded.

November 2, 2020 HF:

All comments cleared.

### Agency Response

July 13, 2020 UNDP

1. Additional information on the institutionalization, scaling up and wider application of the project approach has been added to this section as requested (See CER page numbers 63 to 65 and ProDoc page numbers 65 to 67 for details).

3.) Additional information has been provided on financial sustainability results, including explanation of the removal of barriers towards addressing the financing gap. The project approach towards achieving sustainability of capacity-building efforts, citizen engagement/awareness etc. has also been included in this section (See ProDoc pages 67-68 and CER page numbers 66-67 for details).

The following explanation has been added to the section on social sustainability: The project support for gazettement of new PAs as part of the expansion of the PA network to increase coverage of EAAF sites for migratory waterbirds will involve a range of measures including support for stakeholder consultations, safeguard screening and FPIC concerning the creation of new PAs. This will go beyond the existing national government processes required to reach agreement with the lower levels of government that have existing responsibilities for the proposed PAs, and ensure that these new sites take into account and have the support of local residents and resource users (See CER page 67 and ProDoc Page numbers 68 and 69).

September 8, 2020 UNDP:

1.) Please see the additional narrative explanation that has been included in this section of the CER and Project Document (see page numbers 70 to 72 of the ProDoc and page numbers 67 to 70 of the CER for details).

4.) Please see the additional narrative explanation that has been included in this section of the CER (see page number 70 for details).

**Project Map and Coordinates**

**Is there an accurate and confirmed geo-referenced information where the project intervention will take place?**

Secretariat Comment at CEO Endorsement Request

HF, October 10, 2018:

Yes.

Agency Response

**Child Project**

**If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF: NA.

Agency Response

**Stakeholders**

**Does the project include detailed report on stakeholders engaged during the design phase? Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

1. Please complete section in CER template with key elements of the approach/plan to stakeholder engagement.
2. Please include an examination of the barriers participation, engagement, benefits to marginalized stakeholders (including ethnic minorities and women) and how the project will address/overcome these in the CER/ProDoc.
3. South-south cooperation section seems out of place here. Would be best to include broader treatment of s-s cooperation in section on KM and/or sustainability. This is an important element of the project.

July 31, 2020:

- 1.) Thank you for this-please redact the stakeholder analysis table as this is readily available in the ProDoc annexes-(can reference that)-it will improve the clarity of this section. The text and the stakeholder plan table provide a decent (albeit long) overview for the CER.
- 2.) Thank you for this. One sentence at the end stuck-out: "Particular attention was given towards consultation with ethnic minority communities present at the Dashanbao demonstration site during the PPG stage, and they will continue to be a focus of attention during project implementation." This seems inconsistent with other parts of the CER/ProDoc package that state the ethnic minority population won't be present at site during implementation. Please clarify/reconcile.
- 3.) Comment cleared.

November 2, 2020 HF:

All comments cleared.

Agency Response  
July 13, 2020 UNDP

1. Key elements of the Stakeholder Engagement Plan (Prodoc Annex 7) have now been presented in this section, including a stakeholder analysis table and the stakeholder engagement plan table (See CER page numbers 68 to 83).
2. The barriers to the participation, engagement and benefits to marginalized stakeholders including ethnic minorities and women and the project response to these barriers has been added to the Stakeholder Engagement Plan in Annex 7, and to the main text on stakeholder engagement (See Annex 7 page 6-7, 11 to 20, CER page number 82-83 and ProDoc page numbers 63 and 64).
3. The text on South-South Cooperation has been moved to CER Section 2, #8) Knowledge Management (see CER page number 109).

September 8, 2020 UNDP:

- 1.) The stakeholder analysis table has been removed as requested.
- 2.) We agree that this was badly worded. The ESMF stated that if Ethnic Minority people remain, and if screening indicates that they might be affected by the project, the risk will be altered to “high”, and a targeted ESIA and agreed mitigation measures will be required. In this sense they would continue to be a “focus of attention during project implementation”. This remains the case.

#### **Gender Equality and Women’s Empowerment**

**Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities?  
If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

- 1.) It is good to see the focus on participation, and capacity building focused on women throughout the gender analysis and planned for the project, but it is not clear from the gender analysis what the barriers to women’s empowerment are and whether, how and to what extent the project will actually be addressing these barriers which could significantly impact efforts to address gender equity issues effectively in the project. For instance, the analysis states that in rural areas women do three times the amount of unpaid labor as men (and are paid 65% as much per hour for paid labor). The massive inequality in unpaid labor could very well mean women have little time or energy for anything else. The project has committed to targets for women’s participation and dedicated activities for women, but how will such barriers to women be addressed to sustainably and fairly include them?

2.) The budget column for the implementation of key gender equity actions seems to be blank. How is the project budgeting to cover expenses related to these actions? Where is this included in the project budget? The expense doesn't seem to be included in the provisional budget in the gender analysis annex.

July 31, 2020 HF:

1.) Comment cleared.

2.) Comment cleared.

### Agency Response

July 13, 2020 UNDP

1. The barriers to women's empowerment have been elaborated as requested in the Gender Analysis and Action Plan in Annex 9 (See Annex 9 page numbers 20-21) and summarized in the main text, together with the project's responses to these barriers (See CER page number 84 and ProDoc page number 64).

The budget column in the Gender Action Plan has now been completed, drawing from the related lines in the overall project budget (See Annex 9, page numbers 25-27). The two are now consistent, ensuring that gender equity and the empowerment of women are adequately funded in the related project activities (especially in Outputs 4.1, 5.1 and 6.3).

#### **Private Sector Engagement**

**If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?**

### Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

1.) Please provide increased detail in the CER about the plans and current relationships/engagement with the private sector. For instance: what is planned around 'expanded private sector investment' in wetland PAs-is there a model for this? Is this via concessions? Or tour operators? CSR donations? Or eco-compensation or something else? I would imagine with the project's focus on sustainable financing, and the very significant identified financing gap that the private sector is going to need to be a key partner.

July 31, 2020 HF:

- 1.) Thank you for this. Please ensure text is included in CER.
- 2.) Given this project focuses heavily on wetland conservation, and wetlands clearly provide significant/valuable ecosystem services it seems PES/eco-compensation should be considered as a potential core approach to sustainable financing. To what extent will this be included in the business/financial sustainability plan/approach. Industry would be a key PS player in this.
- 3.) It doesn't look like the Private Sector was selected as a stakeholder that was consulted in PPG. Is this accurate? Please correct and/or explain if not, why not.

November 2, 2020 HF:

All comments cleared.

**Agency Response**  
July 13, 2020 UNDP

The private sector will be a key partner for PA investment via tourism concessions, CSR donations, and eco-labelling.

- (1) *Tourism concessions*: It is a mostly commonly used investment approach to expand PA financing. The PA authorities delegate the tourism concessions to tour operators for the entrance fee collections, transportation services, guided tours, meal services and nature-friendly activities, such as nature education, birdwatching, photography and camping. The share of tourism concessions will increase PA investment. Such kinds of tourism concessions have been tested in the Yellow River Delta NNR and Liaohe Estuary NNR.
- (2) *CSR donations*: Some Foundations provide a CSR donation mechanism for expanded PA investment, such as in the case of SEE Foundation, which has more than 300 members that are private enterprise owners, each member committed to donate 100,000 CNY each year for 10 years. SEE Foundation contributes towards the conservation of waterbirds and their wetland habitats. For example, the East China Center of SEE Foundation is working with Chongming Dongtan NNR to operate the NNR nature education center with CSR donations.
- (3) *Eco-labelling*: Some small enterprises involve the operation of some environment-friendly product production, such as “scarlet ibis rice” in a NNR in Northwest China [note – this refers to the formerly critically endangered Asian Crested Ibis in Shaanxi Province, which had declined to just 7 birds in China by 1981], where the paddy fields are managed through an environment-friendly approach, without using pesticides and herbicides, “scarlet ibis rice” with eco-labelling could be sold at higher price. Such kind of eco-labelling provides an incentive mechanism for small enterprises, and indirectly expands the PA investment. Similar approaches for eco-labelling products of sustainable wetland use (including eco-friendly rice cultivation) are proposed under the GEF Flyway project for the sustainable landscape management, especially for the croplands, fishponds and salt pans, which are used as habitat by waterbirds.

Some private sector actors could be key stakeholders, such as the owners of the croplands, fishponds and salt pans known to be used by waterbirds. The eco-labelling is an incentive mechanism for the private sectors investment, rather than the provision of eco-compensation by government (See CER, page numbers 39 and 86).

#### September 8, 2020 UNDP

2.) Wetland conservation (with support from the GEF Flyway intervention) will increase the wetland ecosystem services, including provisioning services, regulating services, cultural services and supporting services. The provisioning services may directly benefit or support industries based on shellfish, fishery and reed production; while cultural services may benefit or support tourism and recreation (eg birdwatching, photography). However, the regulating services and supporting services may not directly benefit or support industries. The payment of ecosystem services (PES) or eco-compensation approach needs to clearly define some elements, such as (1) who benefits from the services, (2) who provides the services, (3) how many services (quantification), (4) how the payment could be managed (mechanism). Considering the complexity of eco-compensation, it is still difficult to implement the eco-compensation programme in China, including this project. There are a few successful examples of eco-compensation programmes, but not many.

Given that the GEF Flyway Project is mainly focused on waterbird and habitat conservation and restoration, the cultural services would be the most significant ecosystem services that can be increased as a result of project intervention, so linkage with the ecotourism industry (including nature education) is possible; as well as industries related to shellfish, fisheries and reed production, as the project would balance the shellfish and fish for bird food or for livelihoods of communities. The local governments in Liaohe NRs, Yellow River Delta NNR and Dashanbao NNR are promoting the eco-tourism industries, which benefit directly from waterbird and habitat conservation, especially birdwatching and nature education. We have discussed with tourism companies at Liao River Estuary and Yellow River Delta to promote the birdwatching and nature education activities, while discussions have been held with reed company managers at Liao River Estuary regarding the planned project pilot on balancing water management requirements for reed production and wetland restoration. These appear to be the best opportunities for linking ecosystem services to private sector engagement.

3.) The Private Sector was indeed included as a stakeholder category and consulted during the PPG (See Annex 7 Stakeholder Engagement Plan and Annex 18 List of People Consulted for details). Examples include: Beijing Orient Landscape Investment Holding Co. Ltd. / Beijing Qiaonyu Foundation, Beijing Water Drop Public Welfare Company; Shengli Oilfield Oil Development Centre, Gudong Oil Company, Agriculture Demonstration Center, and Yellow River Delta Eco-tour Company at the Yellow River Delta; Liaohe Oil Company, Beihai Reed Company, Chengdao Ecological Tourism Company and Panjin Culture and Tourism Company at Liao River Estuary.

#### **Risks to Achieving Project Objectives**

**Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?**

#### Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF: Thank you for the inclusion of the project SESP and ESMF in the CER package. After a detailed review of all submitted materials GEFSEC has identified the following issues:

1. Given the scope and scale of risks associated with the legal gazettement of protected areas (18 proposed under this project-all of which have yet to be screened); improvements in PA management in demonstration sites; and the presence of ethnic minorities in at least one demonstration site (Dashanbao), it is unclear why UNDP has not categorized this project as High Risk. This requires a detailed justification. Please provide.
2. Please provide a table that contains each of the four demonstration sites and sites for PA gazettement (based on Annex 21-B, appendix 2), categories of planned project activities (e.g. improved PA management, legal gazettement etc), the associated potential risks (including whether or not any resettlement is planned by the government), proposed mitigation measures, whether ethnic minorities are present and risk rating. Please indicate what further assessment/planning is proposed at project inception.

It is unclear why such screening was not undertaken during project preparation. The expectation for GEF projects of this nature is the full screening and consultation for all project sites take place prior to CEO endorsement. For example, a higher level of site-based risk screening was undertaken for all PAs included in GEF-6 CPAR child projects. Furthermore, undertaking a comprehensive screening of sites prior to CEO endorsement should defacto eliminate (or nearly fully mitigate) Risk 12 (*New PAs may be established without taking full account of environmental and social risks associated with the specific locations. Designation of sites as PAs may result in significant social and/or environmental impacts that raise significant concerns among potentially affected communities and individuals, or which involve significant impacts on physical, biological, socioeconomic or cultural resources.*)

3. Please clarify why Risk 1 doesn't apply to ethnic minorities at the Dashanbao project-affected area as noted (given they are clearly stakeholders in the project and were consulted during the project stakeholder assessment)? Is this because this risk to ethnic minorities at this site addressed separately and directly in Risk 3 and Risk 1 pertains to all others?

4. Given the scope and scale of Risk 3 (below as articulated in the SESP and ProDoc/CER) it is unclear why this risk has not been categorized as “high.” Please justify.
5. Given the stakeholder consultations with ethnic communities and government at and about the Dashanbao site that were held during PPG, why is there confusion about the presence or status of these communities at the site?
6. What are the current poverty alleviation activities taking place in Dashanbao and do they include resettlement (related to question 5)?
7. Top of page 6 of the SESP, last sentence of #3 should read “involuntary” rather than “voluntary,” correct? If that is the case, please revise.
8. ESMF M&E plan currently has no budget attached to it. How does the project intend to monitor and evaluate mitigation measures, pay for further assessments that will likely be required given project support for PA gazettement and work in ethnic minority areas? Please include budget for these activities.
9. The risk of the COVID-19 pandemic should be fully and explicitly addressed in the risk section and include mitigation/adaptation measures.

July 31, 2020, HF:

1. We maintain that this project is high-risk given that at CEO endorsement request stage there are 18 sites for PA establishment that have not yet been finalized or undergone environmental/social review (see Risk 12). Further, the other project risks are numerous and deemed *moderate* which further contributes to an aggregate high risk.
2. This comment/question refers to both the demonstration sites AND the 18 proposed PA establishment sites. The response only includes the demonstration sites. This issue may be addressed visa vis addressing issue #1 above regarding the overall risk rating of the project.
3. Comment cleared.
4. 5. 6. Given the past and ongoing resettlement activities at the **Dashanbao site**, please either redact this demonstration site from the current project or fund it with co-finance resources. We welcome the justified inclusion of an alternate demonstration site for GEF financing.

**Resettlement:** Please ensure that all relevant project documentation-including commitment of NFGA (and other PRC entities)-states that the project will avoid any/all resettlement (and resettlement of anybody). This concern was raised in reference to the letter from NFGA that stated resettlement of “local communities” or “ethnic minorities” whereas we should avoid engagement with ANY resettlement.

7. Comment cleared.
8. Comment cleared.
9. Comment cleared.

November 2, 2020 HF:

1. & 2. Comments cleared

4, 5, 6. Please include language in the project documentation that indicates that: GEF funds will not be used for “ecological relocation” (in addition to any resettlement related to general poverty alleviation) nor will GEF resources be used to support livelihood development for resettled communities which are not directly related to the conservation of globally significant biodiversity conservation (as is this not the purpose of GEF funds).

November 25, 2020 HF:

All comments cleared

#### Agency Response July 13, 2020 UNDP

1. Under the SESP, a project’s overall risk rating is derived from the level of significance of its highest individual risk. The significance of each risk is determined through a combination of the risk’s foreseen impact and the probability of its occurrence, using the matrix in the UNDP Social and Environmental Screening Procedure (Page 17) : <https://www.undp.org/content/dam/undp/library/corporate/Social-and-Environmental-Policies-and-Procedures/UNDP-Social-Environmental-Screening-Procedure-1January2015.pdf>

None of the risks identified in the SESP for this project (prodoc Annex 4), in terms of their combined probability and impact, were assessed as “High”. The overall “Moderate” risk rating reflects a project in the category described in the UNDP SES as “having potential adverse social and environmental risks that are limited in scale, can be identified with a reasonable degree of certainty, and can be addressed through application of standard best practice, mitigation measures, and stakeholder engagement”, which we feel is appropriate for the project.

The SES state that for Moderate Risk projects: “Further assessment may determine that a full social and environmental assessment is required in order to ensure that the SES requirements are addressed, and that the Project should be re-categorized as High Risk.” Such further assessment is prescribed under the ESMF

(Annex 8) at project inception for all project activities as they arise and as part of the process for inclusion of additional sites. The ESMF requires this, and Section 3.2.1 states:

“Additional assessment is required during the inception phase as proposed management-strengthening measures are further defined, in order to identify any proposed restrictions/alterations to access and use of wetland resources which may adversely affected some individuals, groups or communities. Such assessment will identify, through stakeholder consultation, which users/user groups might be affected, the magnitude and severity of any associated impacts, and measures to avoid, minimize, mitigate or manage such impacts will be developed and implemented. Assessment reports will inform revision of the SESP, and the development of management plans.”

The SESP has been conducted on the basis of the currently-identified locations, and the broad scope of envisaged project activities. Further SESP assessment will be conducted to ground-truth the identified impacts at project inception, and for specific project activities as they arise. Legal gazettement does not in itself entail economic displacement or other significant impact. The ESMF prescribes an SESP process for on-the-ground project activities as they are defined on a site-specific basis, ensuring that impacts are adequately “designed out”, minimized, mitigated or managed or, where this is not possible, ruled out of inclusion in the project.

The possibility of re-categorizing the project remains not only open, but is specifically required in the case of potential economic displacement and/or adverse impacts on ethnic minorities. It states:

“If it is the case that Ethnic Minority people remain, the risk rating, and consequently the overall project risk rating, must be altered to “High”.”

Categorizing the project as High at this stage would not be appropriate on the basis of the envisaged activities and the established baseline situation. It would entail a comprehensive ESIA, which in view of the impacts identified to date, the envisaged project activities, and the built-in required procedures for the selection of further sites which preclude the inclusion of any sites which would entail significant impacts, would be an inappropriate and unnecessary use of resources and time. Where any activities require an ESIA, either targeted or comprehensive, it will take place. As with any project, should unexpected High impacts be identified during the course of the project lifetime, the project will be re-classified and the required impact management measures implemented.

The table below covers the four project demonstration sites, categories of planned project activities (e.g. improved PA management, legal gazettement etc), the associated risks, proposed mitigation measures, whether ethnic minorities are present and the risk rating.

Proposed network expansion sites are considered provisional “candidate” sites. The process whereby such sites are to be included in the project is described in the ESMF section 3.1.2. The screening process will rule out any proposed sites that involve involuntary resettlement, as well as any that pose adverse impacts to the

rights and interests, lands, territories, resources, and traditional livelihoods of ethnic minorities. GEF will not fund any expansion of existing PAs or the establishment of new PAs which require or cause resettlement of locally-resident individuals, communities or businesses.

In addition to the “screening out” process, proposed sites will undergo a full SESP screening and assessment. Section 3.2.2 describes the further assessment that will be undertaken where it may be required following screening. Where proposed sites do not meet these required standards, NFGA will propose alternative sites for inclusion during implementation, totaling a comparable area. Alternative sites will be subject to the same screening procedure.

2.

No.	Site Name	Project Activity Category	Associated Risks	Proposed Mitigation Measures	Ethnic Minority Presence	Risk Rating
<b>Project Demonstration Sites</b>						
1	Liao River Estuary NNR/PNR, Liaoning	-Improved PA management - Capacity development - Wetland management / restoration - Waterbird monitoring - Sustainable livelihood development - Env awareness raising	Residual contamination following oilfield clean-up by company (risk to project staff)[1]  Not informed of any ongoing resettlement	SESP screening of all on-the-ground activities, with full stakeholder consultation. Activities assessed as having potentially significant impacts to be the subject of additional study, including any impacts on reed harvesting and wetland resources. Complete prohibition on involuntary resettlement. Oilfield clean-up by company to be assessed for effectiveness.	None	Moderate
2	Yellow River Delta NNR, Shandong	-Improved PA management - Capacity development - Wetland management / restoration - Waterbird monitoring - Sustainable livelihood development - Env education & awareness raising	Residual contamination following oilfield clean-up by company (risk to project staff).  Not informed of any ongoing resettlement	SESP screening of all on-the-ground activities, with full stakeholder consultation. Activities assessed as having potentially significant impacts to be the subject of additional study. Complete prohibition on involuntary resettlement. Oilfield clean-up by company to be assessed for effectiveness.	None	Moderate

3	Chongming Dongtan NNR, Shanghai	<ul style="list-style-type: none"> <li>-Improved PA management</li> <li>- Capacity development</li> <li>- Wetland management / restoration</li> <li>- Waterbird monitoring</li> <li>- Sustainable livelihood development</li> <li>- Env education &amp; awareness raising</li> </ul>	<p>No indication that wetland resources are used for anyone's livelihood purposes.</p> <p>No permanent residence at the site.</p>	SESP screening of all on-the-ground activities, with full stakeholder consultation. Activities assessed as having potentially significant impacts to be the subject of additional study, including impacts on wetland resources and land use.	None	Low
4	Dashanbao NNR, Yunnan	<ul style="list-style-type: none"> <li>-Improved PA management</li> <li>- Capacity development</li> <li>- Wetland management / restoration</li> <li>- Waterbird monitoring</li> <li>- Sustainable livelihood development</li> <li>- Env education &amp; awareness raising</li> </ul>	Potential risk to IPs of economic displacement, sites of cultural significance.	<p>SESP screening of all on-the-ground activities, with full stakeholder consultation.</p> <p>Activities assessed as having potentially significant impacts to be the subject of additional study.</p> <p>Complete prohibition on involuntary resettlement.</p> <p>Project to be re-categorized as High Risk if impacts on IPs are identified.</p> <p>Targeted assessment, with FPIC procedures, as required by ESMF</p>	Yes	Moderate

3. Correct. Impacts on ethnic minorities are covered under Risk 3.

4. See point 6 below

5. See point 6 below

6. Points 4, 5 and 6 are addressed together here. We agree that the default starting point for potential adverse impacts on ethnic minority people would normally be “high”. However, our information is that all ethnic minority people living at the Dashanbao site were due to be resettled under the government 13th Five Year Plan currently underway. The resettlement is part of the government’s national poverty alleviation strategy. Between 2016-2020, 9.47 million people have been resettled from poor and marginal areas across China. In Yunnan, 650,000 people have been resettled. The remaining ethnic minority residents at Dashanbao were expecting to be resettled during 2019 or by summer 2020 at the latest.

Project-induced involuntary resettlement is a clear “red line” for UNDP. No project supported by UNDP will result in the forcible removal of indigenous peoples from their lands and territories. Resettlement, particularly if it might apply to ethnic minorities, was a clear and obvious safeguards concern. However, we are entirely satisfied that the resettlement is not an impact of the project, and it is not related in any way to the existence of the PA. In view of the already-existing

government resettlement plans, Risk 3's probability of occurrence has therefore been conservatively rated in the SESP as "not likely" (2), rather than "slight" (1). The impact of the risk has been upgraded to "severe" (4), but the low likelihood still results in an assessment of "Moderate". It has not been possible to return to the remote location to verify that the scheduled resettlement has taken place. However, the SESP finding will be ground-truthed at project inception, along with all other identified risks, and the ESMF makes it clear that re-categorizing as "High" will be required should ethnic minorities be found to remain at the site, and specifically states as such in section 3.2.1.

If ethnic minorities remain at the site at project inception, an Ethnic Minorities People's Plan will be developed. The SESP states that activities which would render untenable the continued residency of any ethnic minority people in the project affected will not be undertaken. GEF will not fund any activities which result in ethnic minorities being required to relocate, nor activities which render untenable their continued residency in the project area. The Ethnic Minority Peoples' Plan for Dashanbao, and any required Plans for new PA sites, will include measures to ensure that project activities do not result in a risk of voluntary relocation.

It is not expected that ethnic minorities will be found at additional sites, which are largely in Southern and Coastal areas. Section 3.1.2 of the ESMF precludes the inclusion of any additional sites which would entail either voluntary or involuntary resettlement or which may result in adverse impacts on ethnic minorities, specifically stating: "Screening of proposed new PA sites will also establish whether or not ethnic minorities are present at or within the sphere of influence of the site. The presence of ethnic minorities will not in itself preclude the establishment of a PA under the project, but activities which pose adverse impacts to their rights and interests, lands, territories, resources, and traditional livelihoods will not be permitted."

We are not aware of any specific poverty-alleviation activities taking place in at Dashanbao other than the government's resettlement programme and the activities detailed in the prodoc **Annex 17D**.

7. "Voluntary" is the intended term. The term "voluntary" is intended to indicate that should project activities make continued existence in the project area simply more difficult (rather than unviable) to the point where people choose to relocate, the source of such secondary impacts will be addressed. (A secondary, or indirect impact of project activity that would result in continued existence at the site becoming unviable, would be described as "involuntary relocation", and no such activity will be undertaken by the project, at any location). The top of page 6 of the SESP, last sentence of #3 has been revised accordingly.

8. The ESMF M&E Plan is now costed, including time inputs from the fulltime M&E and Safeguards Officer, International Safeguards, ESIA and Resettlement Specialist (45 days), Project Manager, associated travel costs and printing costs. (See revised ESMF in Annex 8, page numbers 27 to 29).

9. Risks to project implementation associated with the COVID19 Pandemic are currently included in Annex 5 UNDP Atlas Risk Register (Risks 7 and 8). Risk 7 and proposed mitigation measures have been elaborated, and both risks emphasized in the main text section on risks (See CER page number 89 and ProDoc page numbers 66 and 67).

---

[1] Note – while the project will not do any GEF-supported restoration of wetlands in former oilfield areas, these former oilfield areas remain inside the PAs and represent a risk to project/PA staff. This remains as Risk 6 in the SESP. The management of that risk would be achieved by having the clean-up (done by the oil company) checked.

September 8, 2020 UNDP:

1. Agreed. Risk 12 has been re-assessed as “high” on a precautionary basis, thereby triggering all safeguard principles and standards with the exception of Standard 7, which is not considered to be significant due to the nature of the project.
2. Overall risk rating has been altered to “high” (See Annex 4 SESP, Annex 5 Risk Register, Annex 8 ESMF of the ProDoc and Section 5, page numbers 87 and 89 of the CER for details).

4,5,6. Please refer to letter from NFGA (See Annex 27), outlining the critical need for assistance at the Dashanbao site. We also wish to emphasize that the government-led resettlement taking place at Dashanbao is also taking place in multiple locations across China, and is completely unconnected with the PA.

The ESMF makes it clear that the project will avoid all resettlement, and will not conduct any activities which entail resettlement, either directly (i.e. activities which would require residents to relocate), or indirectly (activities which may result in local residents deciding to leave voluntarily) at any location. This has always been the clear intention. Proposed new sites will undergo screening, and where such screening indicates that resettlement may be required, such sites would not be permitted to join the project and alternative sites would need to be proposed. Wording has been added to the ESMF to make it doubly clear that the project will not require, or cause, resettlement to occur (See Annex 8 ESMF for details).

November 11, 2020 UNDP:

As requested, changes have been made to the project documentation to emphasize that GEF funds will not be used for ecological relocation or any other type of resettlement (i.e. poverty alleviation measures) nor will GEF funds be used to support livelihood improvement/ for resettled communities which are not directly related to the conservation of globally significant biodiversity. For details, see the section risk of the CER, page numbers 87, 90 and 96; the risk section of the ProDoc, page numbers 63, 65 and 126; Annex 4 SESP, page number 6; and Annex 8 ESMF page numbers iii and 14.

## **Coordination**

**Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

Please provide further justification/explanation about why the Secretary General of SEE Foundation was selected to represent beneficiaries for this project.

July 31, 2020 HF:

Great! Comment cleared. Please include in project documentation.

Agency Response

July 13, 2020 UNDP

The UNDP project implementation procedure requires one representative to participate on the Project Steering Committee to represent all project beneficiaries. During the PPG, SEE Foundation was proposed as the representative of beneficiaries on the grounds that it is a significant national NGO whose mission is closely aligned to the project objective. SEE Foundation was established in 2008 with the mission of supporting and nurturing Chinese environmental civil society organizations, and facilitating a learning platform for entrepreneurs, NGOs and the public to engage in environmental protection and sustainable development. At the end of 2014, SEE Foundation became a public fundraising foundation working on three main areas, namely desertification control, pollution prevention and green supply chains, as well as ecosystem conservation and nature education. While the scope of its work continues to expand, SEE Foundation is firmly committed to supporting the environmental cause of China's civil society. Overall, SEE Foundation is the most important funding provider to promote the grass-root NGOs in China.

In the case of the current project, SEE Foundation is very active in bird and habitat conservation, and was the first NGO to provide a co-financing letter, with a substantial total contribution of USD 5.8 million for funding 50-90 NGOs to carry out wetland patrols, waterbird monitoring and science popularization and education, endangered bird surveys in coastal wetlands, and support for the Free Flying Wings Program network. From June 2017 to September 2019, SEE Foundation funded 62 grass-root NGOs (partners) and protected 86 important wetlands. The partners have carried out more than 3,580 wetland patrols and bird surveys, protecting about 3,400 km<sup>2</sup> of bird habitats; nearly 91,000 bird survey records and more than 1,200 threat records have been submitted (such as poaching, pollution, development and construction); and carried out 515 nature education activities, covering more than 110,000 people. The priority sites of SEE Foundation also focus on the coastal wetlands (see the map below). The red dots (total 136) indicate the priority of the SEE foundation, which are not protected by government.

September 8, 2020 UNDP:

Responses are now included in project documentation as requested (See page numbers 87 and 88 of the ProDoc and page number 101 of the CER for details).

### **Consistency with National Priorities**

**Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

Yes.

Agency Response

**Knowledge Management**

**Is the proposed “Knowledge Management Approach” for the project adequately elaborated with a timeline and a set of deliverables?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

1. 6.2.2 what type of platform is envisioned that will be accessible to people at the community level? And to what end? How will it be managed and how will it be sustained once the project period is concluded?

2. Much emphasis on engagement with Ramsar, but GEF serves CBD-so would expect orientation/engagement also with CBD, at least mentioning the CBD COP-15 which China will likely host in 2021.
3. Given the nature of the project what type of South-south engagement planned? Likely makes sense to include here.
4. How does outcome 6.1 link to monitoring across flyway/regionally? And to other global monitoring efforts? How will the system/data be shared transparently throughout the EAAF/globally?

July 31, 2020 HF:

- 1.) Comment cleared. Please include in project documentation.
- 2.) Comment cleared.
- 3.) Comment cleared.
- 4.) Comment cleared. Please include in project documentation.

#### Agency Response

July 13, 2020 UNDP

1. The platform will be similar to *eBird* developed by Cornell University. The Institute of Geographic Sciences and Natural Resources Research, CAS has developed an *iBirding* APP and Database, in cooperation with the *eBird* project, and jointly funded by Paulson Institute, Lao Niu Foundation and CAS Big Data of Earth Sciences, to coordinate the comparable taxonomy, data structure and protocol for bird surveys.
2. The text for Output 6.2 and Activity 6.2.6 has been revised to emphasize CBD engagement in addition to the Ramsar contributions (see CER page number 54 and ProDoc page numbers 60 and 61). The project will participate in and provide some technical inputs to the 15th meeting of the Conference of the Parties to the Convention on Biological Diversity (COP15), provisionally scheduled for the second quarter of 2021 in Kunming as well as the 14th Meeting of the Conference of the Contracting Parties to the Ramsar Convention on Wetlands (COP14) to be hosted by China in 2021. The NFGA is the national administrative authority for the Ramsar Convention, while the Ministry of Ecology and Environment is the CBD National Focal Point. The engagement with the Ramsar Convention is consistent with CBD in that the Ramsar Convention is the lead partner in the implementation of activities related to wetlands under CBD and has a responsibility to offer political, technical and scientific advice and guidance to the CBD and enhance cooperation between the two conventions at all levels (e.g. Ramsar activities are mapped against the Aichi targets and SDGs).

3. The section on South-South Cooperation has been moved to this section as suggested (See CER page numbers 109 and 110).
4. At the flyway/regional level, there are some gaps in database coverage of waterbirds and their habitats. The EAAF partnership is the appropriate platform for this GEF-7 flyway project to work with on this matter. The Science Unit of the EAAF Partnership was established during the MOP meeting in Dec 2018 in Hainan, China (<https://www.eaaflyway.net/eaafp-science-unit-set-up-in-beijing/>), to promote waterbird monitoring and database development. At the global level, the *eBird Project* based in Cornell University is an appropriate partner for this GEF-7 Flyway Project to work with. The Institute of Geographic Sciences and Natural Resources Research (IGSNRR), CAS has developed an *iBirding APP* and Database, in cooperation with the *eBird* project, to coordinate the comparable taxonomy, data structure and protocol for bird survey.

At present, waterbird monitoring in China is conducted by a variety of actors using different approaches. Some of this already contributes towards the EAAFP and other international programmes, but this is not consistent and much of the data is not easily accessible. The main issues regarding waterbirds and their habitats are: a) the waterbird surveys are not consistent with some technical protocols; (2) waterbird data collected by citizen scientists (mainly birdwatchers, photographers) are not integrated into the governmental waterbird database, and could not be accepted for decision-making; (3) the waterbird data collected by PAs and other governmental agencies are not openly accessible for general public, and sometimes not ready to share with regional and global waterbird databases due to various reasons, including lack of capacity and funding of English translation.

Consequently, the waterbird and habitats data need to be shared transparently throughout the EAAF/globally with the intervention of GEF Flyway Project, by working with regional and global database platforms, undertaking some activities to bridge the gaps and develop the database along the East Asian – Australasian Flyway in China, and sharing data transparently throughout the EAAF/globally. An additional activity (6.1.9) on international data sharing has been added to Output 6.1, and activities 6.1.2 and 6.1.3 modified (See CER page numbers 53-54 and ProDoc page numbers 59-60).

This Outcome aims to develop a monitoring and database system that can receive data from a variety of sources and make the data available to different users including international monitoring programmes. Output 6.1 will be led by a group that includes the leading international players in waterbird monitoring in the East Asian – Australasian Flyway including the EAAFP Secretariat (the EAAFP Science Unit is based in Beijing), as well as Wetlands International (who have been running the Asian Waterbird Census and International Waterbird Census for more than 20 years), International Crane Foundation, WWF, as well as IGSNRR and other Chinese national organizations. Both the Chinese government and these INGOs have been members of the EAAFP initiative since its early days and continue to play major roles in its overall direction as well as its technical working groups. In addition, the requirements of EAAFP's Flyway Site Network and the Ramsar Convention provide the foundation for harmonized data and reporting.

Through a series of technical reviews and workshops, the project will develop a concept for the technical framework for waterbird and wetland monitoring and unified database system development in China based on the recommendations of these consultations; and subsequently develop the monitoring protocols and technical and institutional basis for a unified database system for migratory waterbirds and their wetland habitats, supported by a training programme. The international organizations mentioned will be involved in this process throughout, with the aim of filling this information gap in the monitoring of migratory waterbirds across the East Asian – Australasian Flyway. The data would primarily support the EAAFP Flyway Site Network, Ramsar Database and Waterbird Population Estimates database. The latter is the primary source of information for the IUCN Red List assessments on waterbird populations, and the site data would be accessible to support global databases on protected areas (WDPA), KBAs, etc.

September 8, 2020 UNDP:

Responses are now included in project documentation as requested.

See page numbers 53, 55, 69, 70 and 71 of the ProDoc and page numbers 15, 17, 26, 27 29 and 30 of the CER for details on comment 1.). See page number 53 of the ProDoc for details on comment 4.).

### **Environmental and Social Safeguard (ESS)**

**Are environmental and social risks, impacts and management measures adequately documented at this stage and consistent with requirements set out in SD/PL/03?**

Secretariat Comment at CEO Endorsement Request

Please see comments in 'risks' section.

November 17, 2020 HF:

The Portal CER and Draft ESMF in the Portal attached document said ESS overall risk as high. But, the first page table in the Prodoc and Draft ESMF said the overall ESS risk as moderate (main text said high risk). Please correct.

November 25, 2020 HF:

Comment cleared. And to correct language in response below: should read: "ESMF has been corrected and is NOW set as High."

### **Agency Response**

November 19, 2020 UNDP:

Thank you for highlighting this, the risk categorization in the tables of first page of the ProDoc and the first page of the ESMF has been corrected and is not set as High.

### **Monitoring and Evaluation**

**Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?**

## Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

1. Please calculate GHG emission reduction targets for this project under Core Indicator 6.
2. Noting that sites/hectares that will be targeted for PA expansion are KBAs or meet KBA criteria.
3. Indicator 4.2 the name of third-party certification needs completion as it currently states “TBD during PPG phase” this will be explored. Please describe what the result of PPG was and which certification schemes will be applied. Although noting that the 50,000 target in PIF stage has been taken out at CER stage and wrapped into the 600,000 in improved management. Please correct/make consistent.
4. Clear from the budget that restoration is being supported, but no targets are set under indicator 3. GEF-7 doesn't include ecosystem restoration outside of IPs, but if it has clear and specific BD benefits to globally important biodiversity that can be demonstrated/justified then okay. Please revise indicators to include reasonable restoration targets based on activities planned, and include justification for these activities.
5. Project duration in tracking tool should match project duration in CER/ProDoc which it looks like has been updated to six years;
6. There should be indicators in the results/M&E plan that are linked to each of the critical assumptions along the causal chain this will be a basis for adaptive management of the project (e.g. what is happening? What did I think would happen? If it isn't happening why isn't it? what can I do differently to make it happen/achieve an outcome?). How will the critical assumptions in this TOC be monitored as a basis for adaptive management?

August 7, 2020 HF:

1. Thank you for these calculations. Please see follow-up questions below:
  - a.) Please clarify how the indirect carbon benefits are obtained (which activities deriving from the project)?
  - b.) Why have the calculations only taken into account the restoration hectares? Won't carbon benefit also come from the avoided degradation in the PAs and broader landscapes? If so, please include.
  - c.) Please upload the entire Ex-ACT file to help us better understand the assumptions made (for direct and indirect benefits). Thank you.
2. Comment cleared.
3. Comment cleared.
4. Comment cleared.

5. Comment cleared.
6. Comment cleared.
7. GEF Core Indicators: We are trying to reconcile the targets for the GEF core indicators throughout all the project documentation (annexes, CER tables and text). Please review carefully all of these documents and ensure that they are consistent throughout. A couple of specific clarifications:
  - a.) Indicator 1 total: The CER core indicator table provides a total of 192,100 hectares, but elsewhere in the documentation there is reference to 205,000 hectares and other places "over 200,000 hectares." Please reconcile/correct any inconsistency throughout the entirety of the project documentation.
  - b.) Indicator 2 total: 324,439 hectares. These should be mutually exclusive from those targets under Indicator 1. If this is the case then the project would result in the establishment or improved management of 516, 539 hectares of terrestrial and marine PA-total of Indicator 1 and Indicator 2 -Is this correct?
  - c.) To confirm these totals: Indicator 3: 60,000 wetlands restored and Indicator 4: 600,000 landscape improved practices for BD (sub-indicator 4.1). Correct?
  - d.) All of these hectares should be mutually exclusive, and if that is indeed the case then this project will have a hectarage total of 1,176,539 (indicators 1, 2, 3, 4) Is this correct?

November 2, 2020 HF:

All comments cleared.

1.

1.

Agency Response  
July 13, 2020 UNDP

1. GHG emissions targets corresponding to the additional wetland restoration target of 60,000 ha at the project demonstration sites and other key EAAF wetland areas (see point 4 below) have been included under GEF Core Indicator 6.1 (See Annex F of the CER and Annex 13 of the ProDoc for details) and the indicator added to the Results Framework and the Monitoring Plan, Annex 3. The workings and assumptions are presented in (new) Annex 25.

2. All proposed new PAs with project support adhere to KBA criteria, are of recognized global significance for migratory waterbird conservation, and some will contribute towards the World Heritage Convention listing for the Coast of Yellow Sea – Bohai Gulf of China (Phase I&II) (see **Annex 21B**). This has been reflected in various parts of the documents.

3. Third party certification will not be applied to the sustainable use interventions supported by the project. Instead, the project will focus on piloting best practices in line with project-supported national guidelines, but stop short of full certification of products in line with globally accepted standards in view of the significant ongoing technical extension support required to achieve and retain such certification standards, which would not be feasible over such large areas with the resources available. CER Annex F: GEF 7 Core Indicator Worksheet has been edited accordingly.

4. Some 60,000 ha of degraded wetlands will be restored across the four project demonstration landscapes and other key EAAF wetland areas in order to improve conditions for globally significant migratory waterbirds. The final selection of restoration sites will be made using criteria that align with GEF STAP's LDN guidelines and all management actions/plans laid out in the project's ESMF (**Annex 8**) will be duly fulfilled. The vast majority of the restoration work will be carried out through co-financed inputs and in total alignment with national policy, specifically the National Wetland Conservation Programme (2002-2030). This target has been added to GEF Core Indicator 3.4, the project results framework, and Annex 3 Monitoring Plan.

5. The project duration in the tracking tool has been corrected (See Annex 11 of the ProDoc for details).

A column has been added to project document Table 3 to include questions for monitoring these Theory of Change assumptions (See ProDoc page numbers 17 to 21). In addition, the assumptions from Table 3 have been added to the Monitoring Plan in the last column of the table in Annex 3. Finally, some text has been added to the Theory of Change narrative to explain the need to regularly review these assumptions during PIR reporting in line with sound adaptive management and risk management principles (See ProDoc page number 13).

#### September 8, 2020 UNDP:

1.

*a.)* The indirect carbon benefits were obtained by taking into consideration the wider positive impacts on the landscape and the anticipated up-scaling of the project in other parts of China as a result of the project. The GEF described the “Bottom-Up” approach with the replication factor of 3 for 15 years were assumed in the estimated. The replication factor was determined assuming the wider landscape and up-scaling would cover at least 3x of the project area.

*b.)* This has been revised to include the tCO<sub>2</sub>e of emission that will be avoided or sequestered over the period of 20 years resulting from different project interventions such as creating new protected areas, improving management effectiveness of the existing and new protected areas, wetland restoration and sustainable agricultural practices. Please refer to the ProDoc GHG estimates annex for the detailed information on the inputs for the estimates along with the assumptions and limitations.

c.) The revised EXACT file is included with the resubmission (See Annexes 25A and B for details). Thank you.

7. a) The total for **Indicator 1** has been checked as 192,100 ha throughout the documents.

b) We confirm that **Indicator 2** total is 318,379 hectares, and this is mutually exclusive from those targets under Indicator 1. The project will result in the establishment or improved management of 510,479 hectares of terrestrial and marine PAs, representing the **combined total of Indicator 1 and Indicator 2**.

c) We confirm the total for **Indicator 3**: 60,000 ha wetlands restored and **Indicator 4**: 600,000 ha landscape improved practices for BD (sub-indicator 4.1).

d) We confirm that this project will have a hectareage total of 1,170,479 (**indicators 1, 2, 3, 4 combined**)

#### **Benefits**

**Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF:

Yes, although through the course of this project effort it would likely be worthwhile to address this question head on in terms of valuation (may be required if engaging in any eco-compensation approaches) as it seems to be a critical entry point for securing sustainable financing and the mainstreaming of the conservation of these areas in development planning etc (see other related comment in review sheet).

July 31, 2020 HF:

Comment cleared.

Agency Response  
July 13, 2020 UNDP

Please refer to earlier response on ecosystem services valuation of the project sites (numeral 5 of the Review Sheet on cost effectiveness of the project approach)

**Annexes**

**Are all the required annexes attached and adequately responded to?**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: Yes.

Agency Response

**Project Results Framework**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: Yes.

Agency Response

**GEF Secretariat comments**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: NA

Agency Response

**Council comments**

Secretariat Comment at CEO Endorsement Request

Agency Response

**STAP comments**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: NA

Agency Response

**Convention Secretariat comments**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: NA

Agency Response

**Other Agencies comments**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: NA

Agency Response

**CSOs comments**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: NA

Agency Response

**Status of PPG utilization**

Secretariat Comment at CEO Endorsement Request June 15, 2020 HF: Annex C of CER includes detailed funding amount of activities and financing status. Clear.

Agency Response

**Calendar of expected reflows (if NGI is used)**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: NA

Agency Response

**Project maps and coordinates**

Secretariat Comment at CEO Endorsement Request June 5, 2020 HF: Clear.

Agency Response

**Termsheet, reflow table and agency capacity in NGI Projects**

**Does the project provide sufficient detail in Annex A (indicative termsheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table in Annex B to assess the project capacity of**

**generating reflows? If not, please provide comments. After reading the questionnaire in Annex C, is the Partner Agency eligible to administer concessional finance? If not, please provide comments.**

Secretariat Comment at CEO Endorsement Request

June 5, 2020 HF: NA

Agency Response

**GEFSEC DECISION**

**RECOMMENDATION**

**Is CEO endorsement recommended? (applies only to projects and child projects)**

Secretariat Comment at CEO Endorsement Request

June 15, 2020 HF: No. Please address reviewer comment and make adjustments to CER and ProDoc.

August 7, 2020 HF: No. Please address remaining comments and make adjustments to CER and ProDoc.

November 5, 2020 HF: No. One issue remaining in the "risks" section related to safeguards. Please revise project documentation and resubmit for technical recommendation.

November 12, 2020 HF: Yes. All technical comments have been addressed.

November 17, 2020 HF: No. Please make final corrections to co-finance and safeguard rating as reflected in review sheet.

November 25, 2020 HF: Yes, all comments have been addressed.

**Review Dates****Secretariat Comment at CEO Endorsement****Response to Secretariat comments**

<b>First Review</b>	<b>6/16/2020</b>	
<b>Additional Review (as necessary)</b>	<b>7/31/2020</b>	
<b>Additional Review (as necessary)</b>	<b>11/6/2020</b>	
<b>Additional Review (as necessary)</b>	<b>11/12/2020</b>	
<b>Additional Review (as necessary)</b>	<b>11/17/2020</b>	

**CEO Recommendation****Brief reasoning for CEO Recommendations**

The coastal wetlands of eastern China provide wintering, breeding and stopover habitats for millions of migratory waterbirds of about 250 species in the East Asian-Australasian Flyway (EAAF). However, populations of globally significant waterbird species in the EAAF are declining at alarming rates. The EAAF passes through highly-populated eastern China, where rapid economic growth, incompatible use of natural resources and ongoing population explosion have seriously impacted coastal ecosystems and species: China lost an estimated 1,361,200 ha of near-shore and coastal wetlands from 2003 to 2013. As a result, this coastal region of East China is a critically threatened section of the entire flyway for migratory waterbirds, endangering the life-cycles of many species.

The project objective seeks to address this problem by securing the conservation of endangered migratory waterbirds through the establishment of a robust, resilient and well-managed network of protected wetlands across the EAAF in China that will directly contribute towards implementation of the government's Wetland Protection and Restoration System Plan. This will be accomplished through three interlinked components: 1: Flyway PA network planning, expansion, financial sustainability and mainstreaming; 2: Site-based demonstrations of adaptive habitat management and rehabilitation for migratory waterbird conservation; and 3: Knowledge management, awareness, gender mainstreaming and M&E.

The project will result in global environmental benefits that include: national wetland protected area (PA) system along the EAAF expanded with fewer gaps and an additional 204,974 hectares of internationally important wetlands for migratory waterbirds meeting KBA criteria; improved management efficiency, financing and sustainability of PA system along the EAAF; better coordination of data management on migratory waterbirds and public access to data supporting conservation; enhanced management of existing globally significant wetland PAs over 305,505 hectares; reduction of threats to critical wetlands and PAs; improved management and use of flyway wetlands totaling 600,000 hectares outside the PA system; the restoration of some 60,000 hectares of wetlands of importance for migratory waterbirds and mitigation of some 16,999,522 tCO<sub>2</sub>e (direct) and 38,248,924 tCO<sub>2</sub>e (indirect). All of the above will improve the status of globally threatened migratory waterbirds in China, contributing towards stable populations across the EAAF.

GEF trust fund \$10,000,000 co-finance \$87,054,532.