

# Transforming agricultural systems and strengthening local economies in high biodiversity areas of India through sustainable landscape management and public-private finance

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10204

**Countries**

India

**Project Name**

Transforming agricultural systems and strengthening local economies in high biodiversity areas of India through sustainable landscape management and public-private finance

**Agencies**

UNEP, IUCN

**Date received by PM**

12/9/2020

**Review completed by PM**

5/19/2021

**Program Manager**

Paul Hartman

**Focal Area**

Multi Focal Area

**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

01/22/2021

Yes, the project remains aligned with the relevant GEF focal area elements as indicated in table A.

Cleared

Agency Response

N/A

**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

01/22/2021

The project design is appropriate. However, please address the follow comments on Table B:

- 1) The component names are too long. Please shorten and simplify language of all the component descriptions.
- 2) Please make sure to spell out new acronyms introduced for the first time (MSLMBS, CNF and RA-SAS, etc)
- 3) For Indicator 1.2.2, with all the qualifiers in the indicator write up, it is hard to see how this will be measurable. Please simplify the language.
- 4) Component two should be an ?Investment? Financing type, not TA.
- 5) Output 2.1.1 reads more like an indicator than an output. Please modify.
- 6) For Output 3.1.1, please indicate some means through which the private sector will be incentivized (eg. 'through such means as...').

04/06/2021

Comments 1,2, 3, 5, & 6 above have been cleared.

Comment 4: TA resources generally refer to policy support, this component, and particularly outcome 2.1, appear to fall more in line with investment. Please revise.

Please address the following additional comments:

- a) In Project Information, the Rio marker for CC mitigation should be marked 1 not 2 as CC isn't the project's principle objective.
- b) There is not proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 5%, for a co-financing of \$68,307,913 the expected contribution to PMC should be around \$3,415,395. The current amount of \$282,087 is 0.4%. As the costs associated with the project management have to be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution and the co-financing contribution must be proportional, which means that the GEF contribution to PMC might be decreased and the co-financing contribution to PMC might be increased

to reach a similar level. Please amend either by increasing the co-financing portion and/or by reducing the GEF portion.

05/18/21

The responses provided are sufficient. The project structure and design are appropriate to achieve the expected outcomes.

Cleared

### Agency Response

#### Agency Response ? 19 May 21

Component 4 has been revised to ?investment? as suggested.

Additional comments:

- a) The Rio marker has been adjusted to 1
- b) The co-financing portion of funding for the PMC has significantly increased to ensure a proportionality that matches the proportionality of the overall budget. The PMC is 5% of the total GEF project financing. Of the total PMC budget (inclusive of co-finance), 8% is GEF-funded and 62% is co-finance (of the total overall budget, 8% is also GEF-funded and 62% is co-finance). This was achieved by moving Rainforest Alliance and RySS co-finance contributions from Component-based budget line items to PMC budget line items.

Budget tables in Appendices 1 and 2 of the Prodoc (from page 211), and Annex H of the CEO ER (page 102) have been updated accordingly. The revised GEF budget -in both new GEF template as well as UNEP template, have been included in Annex E of the portal version of the CEO ER. portal

In addition, we have also slightly amended the wording in the co-finance letter issued by Rainforest Alliance to reflect this change (see ProDoc Appendix 11, page 279)

-----

#### Agency Response - 26 Mar 21

The above comments have been addressed as follows:

- 1) The component names have all been shortened and simplified. Please see revisions in the CEO ER document, as well as throughout the Prodoc.
- 2) This has now been done throughout the CEO-ER document. There is also a table of acronyms in the Prodoc.
- 3) The language for indicator 1.2.2 has been simplified to *?1.2.2 Number of MSLMBs established and formally recognized with a mandate to plan and implement SLM and biodiversity conservation at micro-landscape scale?*
- 4) Whilst Component 2 indeed has a significant grant value of recurrent resources (mainly via RySS/Government of Andhra Pradesh) most of the outputs concern TA.

- 5) We have adjusted the wording of output 2.1.1 to indicate the purpose of the output first, followed by the result. We believe it now reads more like an output, rather than an

indicator: *?Capacity building and technology transfer delivered towards successful adoption of CNF and RA-SAS practices by 765,000 farmers and farm workers.?*

6) As suggested, additional wording has been added (*?Private sector engaged and incentivized through improved producer organization and increased sustainability of supply to strengthen its commitment to responsible sourcing?*)

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

Secretariat Comment at CEO Endorsement Request N/A

Agency Response N/A

**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

01/22/2021

No. Please address the following:

1) In three of the the co-financing letters (i) RySS/State government of Andhra Pradesh, ii) S&D Sucden, and iii) Rainforest Alliance), it's not indicated in the letter if this is grant or in-kind as is required by GEF policy. Please revise accordingly.

2) For the loan guarantee from Rabobank and the co-financing from Tata Coffee, it's not clear why the ?type of financing is ?Equity? as neither co-financing sources seem to fall into this category. Please explain or select a more appropriate type of financing.

3) No letter from UNEP was not included to confirm its co-financing. Please ensure that this is uploaded.

4) The description of how investment was mobilized should only focus on "investment mobilized" not on all co-financing including in kind. Given the classifications in Table C, this should include details on Rabobank (already included) and Tata only.

04/06/2021

Comments have been cleared. Co-financing adequately documented.

Cleared

## Agency Response

### Agency Response - 26 Mar 21

In response to the above four points:

- 1) The wording in the three co-financing letters (from Rainforest Alliance, RySS and S&D Sucden) have all been revised as suggested.
- 2) The type of financing has been updated to 'Investment guarantee' for Rabobank and 'Recurrent grant' for Tata Coffee.
- 3) This was an error, the UNEP letter has now been attached and uploaded.
- 4) This has been updated and given the reclassification of the Recurrent grant co-finance from Tata Coffee (point 2 above), this section now only includes information on the investment facility secured via Rabobank.

## 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

01/22/2021

The financing presented in Table D is adequate to meet the project objectives.

Cleared

## Agency Response

### Agency Response - 26 Mar 21

We found and corrected for a couple of budget typos and a missing budget line which required some minor reshuffling within component 2 and 3 (although of course within the same overall budget total). As such, please use the attached versions of the budget (new GEF as well as UNEP/GEF templates)

## 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

01/22/2021

Yes, the status of utilization is reported in Annex C. Please confirm that, as is stated as expected, the PPG grant has been expended in full as of December 2020.

04/06/2021

Status and utilization of the PPG is reported.

Cleared

#### Agency Response

**Agency Response - 26 Mar 21**

Yes, the PPG grant has been expended in full.

#### 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

01/22/2021

1. In general, the areas restored and under improved management are very important. It is unclear how they were estimated. Please justify these results through acceptable means (references, estimate of cost per ha, etc)? Type/Name of Third Party Certification is also missing in the core indicator table of the Portal.

2. Area of landscapes under improved management shows a huge result, particularly for sub-indicator 4.3. GEF LD project financing of \$4,474,352 and total GEF financing of \$6.3m generating 1.85m in SLM benefits seems a very ambitious estimate. If this result can be explained through the use of both GEF and the nearly \$70m in co-financing, a clearer explanation of how co-financing will be deployed should be presented. Please justify or revise.

3. It's not understandable how the project can generate benefits for Area of land restored and under improved management (for SLM and through HCV management) and yet not present a GHG estimate. The explanation of how targets were derived mentions that the project will contribute to CCM, but these benefits aren't captured in Table D. Regardless of whether GHG funds were used, it seems reasonable to expect that there will be emissions reductions benefits from these activities and that these should be captured, preferably through an FAO EXACT Tool.

4. The number of beneficiaries shown in Prodoc Table 24 'Global environmental benefits generated by the project' and Core Indicator 11 are different. Please ensure consistency across documents.

5. Additional information/explanation should be provided on how these indicator targets match with focal area specifics: Aichi targets, LDN targets, NDC.

04/06/2021

1. Targets have been revised and rationale provided is sufficient.

2. Target has been revised and rationale provided is sufficient.

3. We are pleased to see the inclusion of a GHG benefit. The methodology presented to justify the result is sufficient. Cleared

4. This is now clear.

5. Aichi, LDN and NDC targets have been clarified.

Cleared

#### Agency Response

##### Agency Response - 26 Mar 21

- 1. In general, the areas restored and under improved management are very important. It is unclear how they were estimated. Please justify these results through acceptable means (references, estimate of cost per ha, etc)? Type/Name of Third Party Certification is also missing in the core indicator table of the Portal.*

Thank you for pushing us on the rationale for these, as it has enabled a careful review and adjustment of indicators. We also agreed on your point with regards to these 'being very ambitious estimates' and this made us realize we needed to reassess, recalculate and revise our targets downwards. The total land area of the project is now calculated as 1,250,000 ha, reduced from 1,470,000 in the December CEO submission. It comprises 1,150,000 ha farmland area and 100,000 ha off-farm area where landscape governance set up by MSLMBs will be established.

The total farmland area targeted in the project is 1,150,000 ha, estimated as follows: RySS has mapped the project landscapes and calculated the areas to be reached during the project's life, based on its State-wide plan for conversion to CNF, approved by the State government. Rainforest Alliance has estimated the area of farmland in the project landscape that could be converted to RA-SAS by end of project, assuming only coffee and spices farms, factoring in growth to date of the system, expected market demand, and production land available. Data of land under coffee and spices production are not available for the specific landscapes targeted, **so they were estimated as a subset of State data, based on knowledge acquired from previous work and from the PPG**



**(field visits and information from the Coffee and Spices Boards) of where the production of coffee and spices takes place in the States. [1]<sup>1</sup>[2]<sup>2</sup>[3]<sup>3</sup> A percentage conversion factor was applied of approximately 40 percent coffee and 20 percent spices to sustainable practices in the project lifetime.** Three criteria were applied in determining the percentage conversion factor: resources available for training and technical assistance; supply chain pull to provide incentives and experience to date of farmer responsiveness, including consultation during PPG but also from pre-PPG interactions with farmers.

Moreover, available resources support the reduction of targets. Total project resources, including co-finance, amount to \$74,856,883, giving a total cost per hectare of changed land use of US\$60. This is a very modest figure compared to many projects that have a three-figure number for cost per ha for less ambitious land use change than that targeted by the project. A larger ha goal would reduce this further. If we estimate the division of these funds between farm-scale and landscape-scale work, taking the cost per output and assigning each output to either farm scale, landscape scale or each scale equally, then the cost per ha is slightly lower for farms and higher for the landscape work, which is much more intensive.

Farm-scale: total cost US\$ 66,974,269; cost per ha US\$58.24

Landscape-scale: total cost US\$7,882,613; cost per ha \$78.83

The off-farm area under improved management to benefit biodiversity (4.1) comprises the target area to be brought under multi-stakeholder landscape governance (excluding 4.4, as that is quantified separately). The total (4.1 + 4.4) area of 100,000 ha was estimated by identifying areas of ecological importance (Tables 20 and 21 in the Project Document) where there is scope for biodiversity conservation, watershed management, wildlife corridor security and SLM, and estimating how much land area could be brought in to improved management over a five-year period, taking into account that structures and relationships exist, on which to build. The project team considers that there is significant potential for convergence with government and other programmes in these micro-landscapes, once activities get underway.

The target of 20,000 ha under GEF Indicator 3.2. in the December CEO submission has been removed, as the PPG baseline field assessments showed this being a project activity in forested land off-farm already captured under 4.4.

The area restored on-farm (3.1) is an estimated percentage of the total targeted farmland ? i.e. the percentage of total targeted farmland which will be restored. The total targeted farmland is based on experience from the application of CNF and RA-SAS systems, alongside the grant or investment resources available to this project. Data from RySS? MEL system reveal an average 10 percent of land converted to CNF applying this agroforestry system. RySS targets conversion to CNF of 600,000 ha (on a total farm area of one million hectares) and hence a restored area of 60,000 ha. RA-SAS targets a total farm area of 150,000 ha, of which likewise 10 percent is targeted for restoration, based on analysis from our experienced technician working in the area. Therefore, based on the total farm area that is deemed realistic to target based on the resources available to this project, and the known realistic conversion rates, we have reduced the ?area of degraded agricultural land restored? target from 125,000ha to 75,000ha. In addition, because the coffee farms in Karnataka have relatively good tree cover, there will be less scope for introducing agroforestry systems than in Andhra Pradesh, but conversely there

---

is a higher need for restoring farmland that has suffered from landslips during heavy rains and areas on farm, including riparian buffers, that have suffered soil erosion. The land area restored through such initiatives will be measured through sampling as part of the project's MEL system, taken together with reports from technicians. Both the CNF and RA-SAS systems inherently lead to soil restoration from eliminating or reducing use of agrochemicals, ensuring vegetative cover, and encouraging capture and storage of rainwater. However, Indicator 3.1 will be measured by additional actions as described.

Area under improved management to benefit biodiversity (4.1) comprises an on-farm target of 60,000 ha and an off-farm target of 75,000 ha. The on-farm target comprises non-certified farmland applying the RA-SAS standard, which has explicit criteria to conserve biodiversity. We know from experience that farms will apply the practices without necessarily becoming certified, because they see value in sustainable agriculture practices. The MEL system will incorporate measurement of biodiversity practices adopted. The project will also incorporate an additional biodiversity module that will be promoted to a subset of farms to be determined, but likely to be spices farms, through collaboration with GIZ, which is focusing on biodiversity practices in spices farms (see Table 15).

The only certification system that will be measured by the project is the Rainforest Alliance system, although other biodiversity-friendly standards will operate in the project landscape, mainly organic and C.A.F.E. Practices. **This has been added to the description of 4.2.**

In summary, the indicator tables have been adjusted as follows:

#### Global environmental benefits generated by the project

GEF Indicator	Project definition	On farm	Off farm	Total	Change from December C submission
3.1. Area of degraded agricultural land restored	Land restored on farms in project landscape (ha)	75,000		75,000	Reduced from 125,000
3.2. Area of forest and forest land restored				0	Reduced from
4.1. Area of landscapes under improved management to benefit biodiversity (ha, non-certified)	Land on- and off-farm in project landscapes that applies measurable practices in RA-SAS system to conserve biodiversity (excludes value of 4.4) (ha)	60,000	75,000	135,000	Reduced from 150,000 ha, a segregated between on-farm and off-farm, whereas in December C submission, it was only off-farm. The change is to align with a closer definition of indicator.

4.2. Area of landscapes that meet national or international third-party certification that incorporates biodiversity considerations	Farmland certified under RA-SAS system (ha)	75,000		75,000	No change
4.3. Area of landscapes under sustainable land management in production systems	Farm area under CNF or RA-SAS system of SLM (excludes values of 3.1, 4.1 and 4.2) (ha)	940,000		940,000	Reduced from 1,200,000
4.4. Area of High Conservation Value forest (HCVF) loss avoided	Area of HCVF (KBAs, wildlife corridors, Sacred groves, reserve forests, community conserved areas, forested areas protecting watersheds) identified and under improved protection (ha)		25,000	25,000	No change
6.1 Carbon sequestered or emissions avoided in the AFOLU sector	Estimated emissions reductions total over 20 years (5,601,545 over 5 years) (tCO <sub>2</sub> e)	?????		22,406,180	Was not included in PIF stage or CEO submission
11. Number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment	Farmers, farm workers, trainers, service providers, stakeholders engaged in landscape management	765,000	5,000	770,000	Reduced from 870,000

2. Area of landscapes under improved management shows a huge result, particularly for sub-indicator 4.3. GEF LD project financing of \$4,474,352 and total GEF financing of \$6.3m generating 1.85m in SLM benefits seems a very ambitious estimate. If this result can be explained through the use of both GEF and the nearly \$70m in co-financing, a clearer explanation of how co-financing will be deployed should be presented. Please justify or revise.

As per response above, we have revised the targets, including the total land area targeted by the project reduced from 1,470,000 ha (not 1.85 million ha) to 1,250,000 ha. The farmland of which at least 50 percent is converted to CNF, which comprises 1,000,000 ha (87 per cent of the total 1,150,000 targeted farm area in the project landscapes) will be fully co-financed by RySS. Its co-financing commitment of \$60 million is calculated based on data generated by its MEL system on conversion costs. RySS reports that the data gathered so far indicate a higher average total cost of conversion than the \$60/ha indicated by the co-financing commitment, but the target is not at risk, because the conversion is a firm State government policy commitment and if further co-financing is needed, it will be made available. The reduced target reduces any gap that may occur between the amount of committed co-financing and actual cost of target area.

The 150,000 ha farmland targeted for at least 50 percent conversion to the RA-SAS system will draw on a small amount of GEF funds to cover training of trainers and fieldwork costs of KMFT, and will also draw on co-financing by Rainforest Alliance to maintain our standard and certification system through, for example, training materials, global technical support to field staff, follow up support by technicians to certified farms, training and quality control of auditors and certification bodies. Additional co-finance to support farmer training will come from companies developing more sustainable supply chains that have not yet made firm commitments. Those will be some of the companies included in the stakeholder analysis in the project documentation. Rainforest Alliance does very little farmer training; rather training of trainers. Moreover, several companies and institutions that have trainers will not request training on the RA-SAS system, because they already work with it and will have been trained on the 2020 Standard before the project starts (a major institutional activity in first half 2021 supported with a US\$ 1 million + budget).

There are no data for India of average costs of transitioning farms into the RA-SAS system, and costs would vary a lot among countries, depending on economies of scale, logistics, etc. We presently sustain certification of around five million ha tropical farmland globally with an investment in technical work from our institutional budgets of around US\$ 30 million. This is possible because the private sector has stepped in so strongly to take on farmer training, given that it has a market incentive. Even if certification is not targeted, there is still an incentive for companies to support sustainable production to meet their own corporate targets. For example, Nestlé does not certify coffee but collaborates with Rainforest Alliance on its own Nescafé Plan, and is now interested in developing additional measures to meet its public carbon neutral target. Around 60 percent of the Rainforest Alliance co-financing in the project (US\$ 840,000) relates to technical work (as opposed to market development, landscape tools, etc.). This is quite well aligned per ha to the global institutional investment each year in sustaining SLM through our certification program.

GEF funds in the project are primarily dedicated to additional on-farm activity that is not part of business as usual for the RySS and RA-SAS systems. Those include restoration initiatives and additional training modules planned, including on biodiversity. We have included in our training material budget, using GEF funds, producing guidance materials on sustainable agriculture, together with the government, to embed selected practices in its agricultural extension work. GEF funds are used for the landscape- scale work, MEL and market development specific to opportunities in the project landscapes.

- 3. It's not understandable how the project can generate benefits for Area of land restored and under improved management (for SLM and through HCV management) and yet not present a GHG estimate. The explanation of how targets were derived mentions that the project will contribute to CCM, but these benefits aren't captured in Table D. Regardless of whether GHG funds were used, it seems reasonable to expect that there will be emissions reductions benefits from these activities and that these should be captured, preferably through an FAO EXACT Tool.*

For now, the USAID AFOLU tool has been used to estimate emissions reductions. This is because at this early stage less detailed data is required in order to run a simulation. At project inception stage, along with the collection of much more detailed baseline information, the FAO EXACT tool will be used to verify and update these estimates.

In order to generate estimates using the USAID AFOLU tool, the Rainforest Alliance climate team prepared a template to gather and review the data available from the PPG phase and target changes in land use from reduction in agrochemical use on farm,

agroforestry/restoration and avoided deforestation/conservation. Additional data and GhG projection were available for Andhra Pradesh from a study undertaken by ICRAF and Technical University of Denmark in 2020, Climate Impacts of Natural Farming. The team concluded that, while the project can indeed use the EXACT tool once a more detailed baseline on current land use and micro-landscape plans are available, it would at this stage be appropriate to use the USAID AFOLU tool to make GhG estimates, as it has done with other projects, given several uncertainties. **The full calculations and assumptions used within the AFOLU tool have been included in the CEO ER document, annex G.**

The quantitative estimates resulting from setting the assumptions, inputting the project targets into the AFOLU tool and using the calculations of the study in Andhra Pradesh (adding in the agroforestry, which is not taken account of in the study) are as follows:

20 year total:

- o Forest protection ? 44,714 tCO<sub>2</sub>e (average 2,236 tCO<sub>2</sub>e/yr-1)
- o Landscape rehabilitation/reforestation ? 1,653,300 tCO<sub>2</sub>e (average 82,655 tCO<sub>2</sub>e/yr-1)
- o Agroforestry (Karnataka)? 165,000 tCO<sub>2</sub>e (average 8,250 tCO<sub>2</sub>e/yr-1)
- o Agroforestry (Andhra Pradesh)- 1,980,000 tCO<sub>2</sub>e (average 99,000 tCO<sub>2</sub>e/yr-1)
- o Crop management (Karnataka)? 563,365 tCO<sub>2</sub>e (average 28,168 tCO<sub>2</sub>e/yr-1)
- o Crop Management (Andhra Pradesh) ? 18 mil tCO<sub>2</sub>e (0.9 mil tCO<sub>2</sub>e yr-1)

Over the course of the five- year project, the estimated emissions reductions amount to 5,601,545 tCO<sub>2</sub>e. The total over 20 years would be 22,406,180 tCO<sub>2</sub>e.

The results written up by the climate team for Karnataka and the Andhra Pradesh study are available, if required. These detail the assumptions.

*4. The number of beneficiaries shown in Prodoc Table 24 ?Global environmental benefits generated by the project? and Core Indicator 1.1 are different. Please ensure consistency across documents.*

This is because the beneficiaries are aggregated in Table 24, but in the Results Framework, they are separated between farm scale and landscape scale; a new indicator has been added to make the totals align (2.2.2).

*5. Additional information/explanation should be provided on how these indicator targets match with focal area specifics: Aichi targets, LDN targets, NDC.*

**Aichi targets:** Project Indicators as they relate to the Aichi targets have been added to the table (Table 25 in Prodoc and Page 8 of the CEO ER).

**LDN targets:** The text in Section 3.6 of the Prodoc (Consistency with National Policies or Plans) referring to the project?s consistency with India?s LDN targets has been edited to include references to the indicators. Information on alignment with LDN targets is also given in Section 7 of the CEO ER (*Consistency with National Priorities*)

**NDC:** Similarly, a paragraph has been added to Section 3.6 of the Prodoc (immediately after the above). Information on alignment with NDCs is also given in Section 7 of the CEO ER (*Consistency with National Priorities*).

---

Data was gathered from the following sources:

- [1] Ministry of Agriculture and Farmers' Welfare. 2015. Land Use Statistics.
- [2] Karnataka State Department of Agriculture. 2015. Profile of Agriculture Statistics.
- [3] Coffee Board of India. Statistics on Coffee. <https://www.indiacoffee.org/coffee-statistics.html>

## **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

01/22/2021

The CEO Endorsement Request (CER) submitted through the portal is the primary document for GEF review. While it doesn't need to be as detailed as the Prodoc, all sections require complete information. We ask the agency to elaborate key points in all the relevant sections in the GEF CER. Much of the required information can be pulled directly from the Prodoc. Specifically with regard to this section, please address the following:

1. The Prodoc lays out very good context on global environmental challenges and how this plays out in Andhra Pradesh and Karnataka, and a clear listing of the root causes and barriers that the project will address by the project. Elements of these should be summarized in the CER.
2. The current context as it relates to COVID in India is laid out in the Prodoc (section 2.4). Elements of this and impacts of COVID on the project sites, which isn't as clear, should be included in this section of Prodoc and CER.

04/06/2021

1. Context has been improved. Cleared
2. COVID impacts and opportunities have been highlighted in the CER and ProDoc.

There is now sufficient elaboration on how the global environmental problems are going to be addressed.

Cleared

## Agency Response

### Agency Response - 26 Mar 21

1. This has been noted. Specifically, additional detail from the Prodoc has been added to the CER sections on root causes and barriers (see page 12 onwards).

2. Additional text has been added to Section 2.4 in the prodoc, under the *Agriculture* sub-heading. This text has also been carried over to the CEO Endorsement (page 15). Please also refer to Table 28 in the Prodoc, where the risks associated with COVID-19 are detailed, together with other risks to the project.

**2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?**

## Secretariat Comment at CEO Endorsement Request

01/22/2021

The baseline information provided in the Prodoc is sufficient, but this section needs to be further detailed in the CER.

04/06/2021

The baseline has been elaborated.

Cleared

## Agency Response

### Agency Response - 26 Mar 21

This section has been expanded upon within the CEO ER, using information and text that was provided in the Prodoc

**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

01/22/2021

No. Please address the following:

1. As this is a critical section, the CER must be completed in sufficient detail, including the components and a Theory of Change diagram with a narrative explanation.

2. Elements of the Prodoc narrative of the alternative scenario as well as aspects of Appendix 3 should be summarized in the CER

3. The narrative explanation of the ToC in the Prodoc should be improved to help explain the diagram. The diagram itself shows good causal linkages but the threats and barriers that the project identifies and which need to be overcome are not represented.

4. There should be an explanation in the CER of the selection on the landscapes considering major environmental degradation and potential for improvement. This can be relocated from the 'Criteria for landscape selection' table in section 7 of the CER and drawn in summary from the 'Analysis for Landscape Selected' write-up in the Prodoc.

04/06/2021

Comments have been sufficiently addressed. The proposed alternative scenario is sound.

Cleared

#### Agency Response

##### Agency Response - 26 Mar 21

1. Additional detail to this section in the CEO ER has now been included, including the addition of the ToC diagram (page 20) and additional narrative (page 19)
2. This additional detail has been added to the CEO ER, please see revised section 3.
3. Additional wording has been added to both the Prodoc and the CEO ER that gives a more detailed narrative explanation of the threats and barriers and links these to the project structure. This text has been included in both documents immediately before the ToC diagram, however the threats and barriers have not been represented in the ToC diagram, as it would become too small to read.
4. The explanation of the selection of landscapes has now been included in section 3 (page 26 of the CEO ER)

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

#### Secretariat Comment at CEO Endorsement Request

01/22/2021

No. This section is missing in the CER and should be included. In addition:

1) From the Prodoc it appears that the project is in generally line with LDFA objectives, however, it needs a better alignment with the UNCCD Land Degradation Neutrality (LDN) concept, at the minimum level, the project should describe this alignment in the



national policy & strategy section and outline in as much it contributes to the implementation of India's LDN targets. Further, the project should clarify if the restoration activities will be counted towards implementation of the Bonn Challenge in India.

2)The description of how the project aligns with the BD Focal Area strategies should also be made clearer.

04/06/2021

Comments have been addressed. The elaboration of project alignment with focal area strategies is sufficient.

Cleared

#### Agency Response

##### Agency Response - 26 Mar 21

1. Text has been added to section 4 of the CEO ER (page 27-28) to specify the project's alignment with the UNCCD LDN concept. This text is also in the Prodoc: Section 2.4 describes India's commitments with regards to UNCCD LDN targets; throughout Section 3.2 there are references (next to each relevant output) describing how the project contributes and aligns.

With regards to the Bonn challenge, as indicated in the Prodoc under Section 3.3. Output 1.1, the project will work with the responsible government agencies and specialist partners to ensure that government policies, procedures and measurement mechanisms necessary to implement and measure the restoration targets are in place. Therefore, land restored under this project *will* contribute towards the Bonn challenge commitment (this has also been clarified in the section 4 of the CEO ER).

2. Description on alignment with the BD Focal Area strategies has also been included ? see CEO ER page 28, text which has also been added to the Prodoc.

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

#### Secretariat Comment at CEO Endorsement Request

01/22/2021

While this is clearly laid out in the Prodoc, this critical section is largely missing in the CER and should be included. Please provide further details in the CER on the added value of the GEF investment relative to the baseline investments.

04/06/2021

Comments have been addressed. The incremental reasoning is clearly elaborated.

Cleared

Agency Response

**Agency Response - 26 Mar 21**

Thank you, additional information from the Prodoc has now been included in the CEO ER, in section 5.

**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

01/22/2021

The project's contribution to GEBs is clear in the Prodoc. However, in the CER GEBs should be summarized. This could be done by including Table 24 "Global environmental benefits generated by the project" from the Prodoc into this section of the CER.

04/06/2021

The comment has been addressed. There is better elaboration on the project's expected contribution to global environmental benefits

Cleared

Agency Response

**Agency Response - 26 Mar 21**

As requested, the Table 24 from the Prodoc has been included in section 6 of CER.

**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

01/22/2021

This section is missing in the CEO ER and should be included. In addition:

1. The project's strategy to leverage public-private investment in SLM is particularly innovative and could be included here, as well as other innovative aspects of the project.
2. Elements of sections 3.8 and 3.9 should be summarized in the CER.

04/06/2021

Comments have been addressed. There is sufficient elaboration that the project is innovative and sustainable and has potential for scaling up.

Cleared

#### Agency Response

##### Agency Response - 26 Mar 21

1. Section 7 (innovativeness, sustainability and potential for scaling up) has been expanded within the CEO ER and includes further detail on the project's strategy to leverage public-private investment
2. Elements of 3.8 and 3.9 have been summarized in section 7 of the CEO ER

#### 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

01/22/2021

Maps have been uploaded to portal but the geo-referenced information provided is insufficient. Please provide more specific geo-referencing.

04/06/2021

The Geo-referenced information provided is sufficient.

Cleared

#### Agency Response

##### Agency Response - 26 Mar 21

More specific geo-referencing (coordinates, based on pentagon areas) have been included in section 7 of the CEO ER, however please note that at present, these are large landscape areas, within which the micro landscapes will later be re-confirmed and accurately be mapped (at project inception stage)

#### 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

N/A

Agency Response N/A

**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

01/22/2021

While a very thorough stakeholder mapping is presented in the Prodoc, this section in the CER requires a more detailed reporting on stakeholders engaged during the design phase and a stakeholder engagement plan. A summary table of what is presented in the Prodoc (section 2.5) on stakeholders engaged during project design would be helpful to this end, as would a brief narrative description on the engagement plan such as what is shown in the 'Stakeholder roles in project' table of the Prodoc.

04/06/2021

A detailed report on stakeholders engaged during the design phase has now been included. There is an adequate stakeholder engagement plan.

Cleared

Agency Response

**Agency Response - 26 Mar 21**

A more detailed summary of the stakeholder mapping and consultation processes, as well as the planned stakeholder engagement in the project has now been included in section 2 of the CEO ER.

**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

01/22/2021

Information provided in CEO ER is sufficient. However, we do request the details on the project's planned Gender mainstreaming be included in section 3, 'Gender Equality and Women's Empowerment' of CEO ER.

04/06/2021

The comment has been adequately addressed. The gender analysis has been completed and the project includes gender-responsive activities and gender-sensitive indicators

Cleared

#### Agency Response

##### Agency Response - 26 Mar 21

As requested, the gender mainstreaming information and table has now been moved from page 35 to page 36, under section 3 of CEO ER.

#### 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

01/22/2021

The strong PS engagement of the project is an important aspect of the approach. Please elaborate in the CER on how specifically 'Private sector partners will also be engaged at a landscape-level,' particularly Tata coffee and other companies referenced.

04/06/2021

The comment has been addressed. Private sector engagement planned by the project is sufficient.

Cleared

#### Agency Response

##### Agency Response - 26 Mar 21

Further explanatory text has been added to prodoc section 3.3 Output 3.2.1 and also to the CEO ER (Section 4)

#### 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

01/22/2021

Risks and measures to address these are elaborated. However, please address the following:

1. The project needs to include a more detailed climate risk analysis in the CER based on robust scientific data and mitigation measures. Elements of this can be pulled into the CER from the Prodoc section on threats. For further guidance please refer to STAP guidance <https://stapgef.org/sites/default/files/publications/Climate%20Risk%20Screening%20web%20posting.pdf>

2. In additions to COVID-19 risks, impacts and potential mitigation measures, the project should detail how the it has identified potential opportunities to mitigate impacts and contribute toward a green recovery and building back better with more resilience (for ease of reference, we advise to present the analysis in a specific note after the risk table). For further clarification, the agency may wish to refer to the note "Project Design and Review Considerations in Response to the COVID-19 Crisis and the Mitigation of Future Pandemics" shared by GEF Secretariat with the GEF Agencies on September 14.

04/06/2021

The comments have been adequately addressed. The project has sufficiently elaborated risks including climate change, including providing a climate risk profile.

Cleared

Agency Response

**Agency Response - 26 Mar 21**

1. This section has been outlined in more detail in the CEO ER (see page 57).

To note that a climate risk analysis was undertaken as part of UNEP's SRIF process, which is outlined in Appendix 15 of the Prodoc and includes information regarding safeguard standard 2 (SS2), Climate Change and Disaster Risk. In addition, and as outlined above, a more detailed and location-specific climate risk analyses will be undertaken as part of project inception within each micro-landscape, following robust, scientific methodologies. The results of these analyses will be shared and discussed with the MSLMBs and considered as part of the development of the SLMPs.

2. As suggested, we have added a section within the CEO ER to specify how the project will seek to contribute towards a green recovery, in line with the note "Project Design and Review Considerations in Response to the COVID-19 Crisis and the Mitigation of Future Pandemics" shared by GEF Secretariat. This is included under the risks section, on page 58

#### **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

01/22/2021

The descriptions provided in the CER and Prodoc of the Implementation Arrangement are helpful, however the diagram provided is unclear and we suggest some re-thinking on its design. The agency should consider using the Project Management Organogram, which is much clearer, as a model. Specific comments that require addressing include:

1. The GEF Secretariat doesn't provide funding to agencies through contracts and shouldn't be indicated as over the implementing agency.
2. There is one agency who is leading the project (UNEP) and this should be represented and the relationship between UNEP and IUCN more clearly laid out.
3. Keeping in mind that this is an Indian government project, the role of the government isn't clearly represented in the diagram. It appears that the government is reporting to RA, which certainly isn't the case and shouldn't be laid out as such.
4. It is unclear who the sub-partners fall under in the diagram.
5. It's unclear where the Technical Coordination Committee and PMU sit within the Institutional Framework. The description of these can be moved from the coordination section.
6. In addition to the above points on the IA diagram, we request that the project considers effort to coordinate with the upcoming GEF FOLUR India project that will work in Punjab and Haryana in north-western India, and Chhattisgarh and Odisha landscape in the central highlands of central/eastern India. There are many areas of overlap in strategies, approaches and desired outcomes and clear synergies and benefits for both projects (and for India) would result from coordination and sharing.

04/06/2021

The above comments have been adequately addressed. The revised diagram is much improved and coordination clearer. On point 6, we understand and agree with the approach suggested for coordination with the FOLUR India project and encourage the project to follow up once both projects initiate implementation.

Please address the following comments on the budget:

a. Mid term evaluation, TE and project inception workshop have been charged to the PMC. Please amend and charge to the M&E budget.

b. Administrative and Finance Manager costs are spread among all three components and the PMC. Please use PMC to cover this (GEF portion and co-financing portion). The same applies for the Project coordinator. Finally, the M&E Officer be charged to the M&E Budget.

C. Budget table should be included directly in the portal version CEO ER.

05/18/21

a. These charges have been moved to the M&E budget. Cleared.

b. Costs of the Finance and Admin Officer and a portion of the Project coordinator costs moved to PMC. Sufficient justification has been provided for splitting other costs of Project Coordinator across different project components. MEL Officer moved to M&E Budget. Cleared

c. The project budget table has not been cut and pasted into Annex E of the Portal entry as is required to have a complete CEO Endorsement Review template. Please upload this directly to the portal version of the CER.

05/19/21

The Budget has now been included in Annex E of the portal entry. However, the budget table is off the margins. We suggest the Agency removes the columns in which they include the expenditure by calendar year, considering that what matters is whether the different budget items are charged to the right source (project's components, M&E, PMC). By so doing, the table will be slimmer, will fit within the margins and will be readable.

05/24/21

The budget in Annex is is now within the margins and readable. The institutional arrangement for project implementation fully described.

Cleared



## Agency Response

### Agency Response 24 May 21

We have both adjusted the budget (removed annual breakdown) as well as uploaded as JPEG file, in order to not affect its formatting.

Note: Due to formatting problem in Annex E, we uploaded only the UNEP/GEF budget template.

### Agency Response ? 19 May 21

a. The mid-term evaluation, terminal evaluation and project inception workshop have now been moved to component 4 (the M&E budget), as suggested.

b. The costs for the **Associate Finance and Administration Officer** (1301), have been moved in full to the PMC, as suggested, and renamed to Finance and Administration Officer to make it a more universally understood title. Note: this post is the key PMU administrative staff.

In order to remain within the PMC maximum limit of 5%, and on deeper analysis and reflection regarding the budget, we have made a number of other minor changes, which include: co-financing 5% of the Finance and Administration Officer from RA budget; cancelling the post 1302 ?Finance & Administration Officer? (which was a part-time position anyway) and used these funds towards a capacity-building focused consultancy that will provide direct technical support to local partners for improved project implementation; moving the costs for the technical committee meetings from the PMC to Component 2, given the actual nature of the activity and support provided; moving the costs for expendable ?Survey Materials? to Component 4, since this is where they more accurately sit; and finally co-financing some laptops and moving the remaining ones for use by project technical staff to Component 2 and 4, where they more accurately sit.

We believe that it is justifiable and necessary from both a project management and budgetary perspective to keep the costs for the **Project Coordinator** (1102) split across the different components and the PMC (20%) for the following reasons:

- The Project Coordinator is selected on the basis of and has responsibility related to technical expertise, steering, and oversight concerning sustainable agriculture, financing and landscape management. As can be seen from the TOR, this is a highly technical role, with significant responsibility for implementation and delivery of all outcomes. As such, whilst the Project Coordinator does have overall day-to-day responsibility as a manager of the PMU and project, this post definitely does not only have an administrative role.
- Having this entire post funded under the PMC budget would double the PMC budget, increasing to 10% of the total budget rather than the recommended 5%. Currently, the role is split equally across all four components and the PMC (20% of total costs).
- Finally, from a project management perspective, with different partners ? including those supervised by IUCN (as GEF Co-IA) each taking a lead for different outcomes, it is important that the Project Coordinator is seen as being equally involved in all outcomes (components) and is able to work across all partners and outcome areas. Having the budget split this way will support this aim, his/her recognition by the entire partnership, and enable the Project Coordinator to split his/her time equally across all outcomes, working with all partners, as well as ensuring the smooth management of the overall project.
- Thus, as well as ensuring we do not exceed the recommended 5% PMC budget, we feel that spreading the costs of this role across all components makes more sense from a technical implementation and management perspective.

Finally, the costs for **the M&E Officer** have been moved and charged to the M&E budget as requested.

Please see the revised Budget (both UNEP/GEF as well as new GEF template with the above described changes made.

#### **Agency Response - 26 Mar 21**

1. Thank you for this feedback. A revised diagram has now been added to both documents, which takes on board all of the feedback in points 1 to 5, above.
6. The project will seek dialogue and appropriate coordination and sharing with other initiatives with a similar purpose or strategic approach. As the FOLUR project will be executed in different landscapes, this would be through the knowledge sharing and outreach under Component 4, as opposed to the convergences sought in Component 2 for technical work in the landscapes, where the project plans to leverage resources and investments by government and non-government institutions. Other projects have also been identified in Section 2.7 for potential coordination and sharing

#### **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

01/22/2021

The description of alignment of the project with identified national strategies and plans is sufficient.

Cleared.

Agency Response

N/A

#### **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

01/22/2021

The narrative write-up on Knowledge Management in the CEO ER is sufficient and we note that KM is a part of Component four. However, a summary of the deliverables and timeline should be elaborated in this section along with a budget. This could be done in a table format.

04/06/2021

The KM approach is adequately elaborated, with a timeline and a set of deliverables.

Cleared

Agency Response

**Agency Response - 26 Mar 21**

The deliverables and timelines for component 4 (from appendix 5 in the Prodoc) have now been added to the knowledge management section (section 8) within the CEO ER **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

01/22/2021

The ESS adequately documents environmental and social risks, impacts and management measures.

Cleared

Agency Response N/A

**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

01/22/2021

A costed M&E plan is provided in Appendix 7 of the Prodoc. While this plan is sufficient it should also be included in the CER.

04/06/2021

The comment have been adequately addressed. A budgeted M&E Plan has been included.

Cleared

Agency Response

**Agency Response - 26 Mar 21**

This has now been included in the CEO ER (page 56 onwards)

**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

01/22/2021

The description of benefits is general and extensively considers the GEBs. What's required in this section is further elaboration of the socioeconomic benefits of the project and how they translate to achievement of GEBs. Please revise accordingly.

04/06/2021

The comment have been adequately addressed. Socioeconomic benefits and how they translate to supporting GEBs is sufficiently described

Cleared

Agency Response

**Agency Response - 26 Mar 21**

Please see the revised and updated section 10.

**Annexes**

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

Secretariat Comment at CEO Endorsement Request

01/22/2021

The Budget table should be included CEO ER. Please do so.

04/06/2021

Comment has not been fully addressed. While the budget has been uploaded as a separate annex, it needs to be included in the Portal version of the CEO ER.

05/18/21

As mentioned in coordination box above, the project budget table has not been cut and pasted into Annex E of the Portal template of the CEO Endorsement. Please do so.

05/19/21

The Budget has now been included in Annex E of the portal entry.

Cleared

Agency Response

**Agency Response 19 May 21:** Sorry for omission; we have now uploaded the (revised) Budget tables both as part of the Portal CEO version, as well as separate annex (and in both GEF as well as UNEP/GEF formats).

-----  
**Agency Response - 26 Mar 21**

This has been included as Annex F

**Project Results Framework**

Secretariat Comment at CEO Endorsement Request

01/22/2021

In the results framework, O1, O2, O3, O4 are all related to Area of landscapes under sustainable land management and land restoration, yet the total area of these outcomes doesn't match what is in CI 3 & 4 (1.47m ha in Results Framework vs. 2m ha Core Indicators). Please explain the difference and revise if necessary, ensuring consistency across results estimates.

04/06/2021

The comment was adequately addressed above.

Cleared

Agency Response

**Agency Response - 26 Mar 21**

Pleased see revised results framework within the CEO ER, as well as the full explanation above, under point 7 (core indicators).

**GEF Secretariat comments**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

**Council comments**

Secretariat Comment at CEO Endorsement Request

01/22/2021

These have been addressed sufficiently.

Cleared

Agency Response

**STAP comments**

Secretariat Comment at CEO Endorsement Request

01/22/2021

These have been addressed sufficiently.

Cleared

Agency Response

**Convention Secretariat comments**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

**Other Agencies comments**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

**CSOs comments**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response  
**Status of PPG utilization**

Secretariat Comment at CEO Endorsement Request  
01/22/2021

See above comment on PPG Utilization.

04/06/2021

Cleared

Agency Response  
**Project maps and coordinates**

Secretariat Comment at CEO Endorsement Request  
01/22/2021

See comment above on geo-referenced coordinates.

04/06/2021

This was adequately addressed above.

Cleared

Agency Response  
**Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)**

Secretariat Comment at CEO Endorsement Request

N/A

Agency Response

**Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)**

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

**Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)**

Secretariat Comment at CEO Endorsement Request

Agency Response

**GEFSEC DECISION**

**RECOMMENDATION**

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

Secretariat Comment at CEO Endorsement Request

01/22/2021

No. Please address comments.

04/06/2021

No. Please address remaining comments.

05/18/21

No. Please cut and paste the project budget table directly into Annex E of the Portal template.

05/19/21

No, please fix the small issue with the budget margins in Annex E.

05/24/21

Yes, the budget in Annex E is now readable and the CEO Endorsement is recommended.

**Review Dates**



**Secretariat Comment at  
CEO Endorsement**

**Response to  
Secretariat  
comments**

<b>First Review</b>	<b>1/22/2021</b>
<b>Additional Review (as necessary)</b>	<b>4/6/2021</b>
<b>Additional Review (as necessary)</b>	<b>5/18/2021</b>
<b>Additional Review (as necessary)</b>	<b>5/19/2021</b>
<b>Additional Review (as necessary)</b>	<b>5/24/2021</b>

**CEO Recommendation**

**Brief reasoning for CEO Recommendations**