



**GEF SECRETARIAT REVIEW FOR FULL/MEDIUM-SIZED PROJECTS*
THE GEF/LDCF/SCCF/NPIF TRUST FUNDS**

GEF ID:	5290		
Country/Region:	Venezuela		
Project Title:	Implementation of the National Biosafety Framework in Venezuela in Accordance to the Cartagena Protocol on Biosafety		
GEF Agency:	UNEP	GEF Agency Project ID:	
Type of Trust Fund:	GEF Trust Fund	GEF Focal Area (s):	Biodiversity
GEF-5 Focal Area/ LDCF/SCCF Objective (s):	BD-3;		
Anticipated Financing PPG:	\$54,714	Project Grant:	\$1,860,000
Co-financing:	\$2,072,000	Total Project Cost:	\$4,041,428
PIF Approval:	August 01, 2013	Council Approval/Expected:	
CEO Endorsement/Approval		Expected Project Start Date:	
Program Manager:	Jaime Cavalier	Agency Contact Person:	Marianela Araya-Quesada

Review Criteria	Questions	Secretariat Comment at PIF (PFD)/Work Program Inclusion ¹	Secretariat Comment At CEO Endorsement(FSP)/Approval (MSP)
Eligibility	1. Is the participating country eligible ?	3-7-13 Yes. Venezuela is eligible for GEF funding. Cleared	6-30-16 Cleared
	2. Has the operational focal point endorsed the project?	3-7-13 Yes. There is a LoE from the OFP for \$2,096,611 including PPG and Agency fee. This covers the request for the PIF (\$2,096,611). Cleared	6-30-16 Cleared
Resource Availability	3. Is the proposed Grant (including the Agency fee) within the resources available from (mark all that apply):		

*Some questions here are to be answered only at PIF or CEO endorsement. No need to provide response in gray cells.
FSP/MSP review template: updated January 2013

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	<ul style="list-style-type: none"> the STAR allocation? 	3-7-13 Venezuela has a BD balance of \$12,990 as of today. Cleared	6-30-16 Cleared at PIF Stage.
	<ul style="list-style-type: none"> the focal area allocation? 	3-7-13 Venezuela has a BD balance of \$12,990 as of today. Cleared	6-30-16 Cleared
	<ul style="list-style-type: none"> the LDCF under the principle of equitable access 	NA	NA
	<ul style="list-style-type: none"> the SCCF (Adaptation or Technology Transfer)? 	NA	NA
	<ul style="list-style-type: none"> the Nagoya Protocol Investment Fund 	NA	NA
	<ul style="list-style-type: none"> focal area set-aside? 	NA	NA
Strategic Alignment	4. Is the project aligned with the focal area/multifocal areas/ LDCF/SCCF/NPIF results framework and strategic objectives ? <i>For BD projects: Has the project explicitly articulated which Aichi Target(s) the project will help achieve and are SMART indicators identified, that will be used to track progress toward achieving the Aichi target(s).</i>	3-7-13 The project is aligned with the Focal Area Objective 3- Building Capacity for the Implementation of the Cartagena Protocol on Biosafety. Please state the relationship between the project and the Aichi targets. 7-29-13 The Aichi Target was NOT included in the section B2 of the PIF as stated in the response to GEF Comments. Please do so during the development of the MSP. Cleared	6-30-16 Addressed as requested at PIF Stage. Cleared
	5. Is the project consistent with the recipient country's national strategies and plans or reports and assessments under relevant conventions, including NPFE, NAPA, NCSA, NBSAP or NAP?	3-7-13 It is not clear why Venezuela is applying for funding to implement the NBF. 1. In chapter 6 (Control y Fiscalizacion de Organismos Geneticamente Modificados) of the Biodiversity Strategy	6-30-16 Cleared at PIF stage

¹ Work Program Inclusion (WPI) applies to FSPs only . Submission of FSP PIFs will simultaneously be considered for WPI.
 FSP/MSP review template: updated January 2013

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		<p>2010-2020, there is a section calling to prevent the use of GMOs (Promover la eliminacion del uso de los OGM en la produccion agricola).</p> <p>2. What is the official position of the Government of the Bolivarian Republic of Venezuela on GMOs? Is the ban on GMOs announced by the former president in early 2000s a Government policy? Is that still in effect?</p> <p>3. Please list the most recent policies, laws and legislations on which this project stands. decree No. 2.223 ("NORMAS PARA REGULAR LA INTRODUCCION Y PROPAGACION DE ESPECIES EXOTICAS DE LA FLORA Y FAUNA SILVESTRES Y ACUATICAS) is from 1992, and decree 1.257 ("NORMAS SOBRE EVALUACION AMBIENTAL DE ACTIVIDADES SUSUCEPTIBLES DE DEGRADAR EL AMBIENTE") is from 1996, decree 4.334. "Creacion Comision Nacional de Bioseguridad) is from 2006.</p> <p>4. The National Biosafety Framework was published in 2005. Is it still in effect or after 8 years there will be a need of a full revision consuming significant resources?</p> <p>7-29-13 Based on the Response to GEF Comments and consultations with the CBD Secretariat, it is now the understanding of the GEF Secretariat that</p>	

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		<p>according to Articles 2(1) and 2(4) of the CPB, all countries need to meet their obligations under the Protocol when they become Parties, regardless of the position of the Governments in office (see email exchange with CBD Secretariat). As stated in the Response to GEF Comments, "Currently the ban for GMOs is still in force and the countries approach does not promote the use of GMOs, until more capacity has been built to strength science-based decisionmaking. Venezuela pretends to strengthen its regulatory system in such a way that possible benefits are/or risks are identified before decision-making occurs. The country is seeking to promote national debate based on the ecological, economic, political and social rights related to the use of GMOs".</p> <p>Cleared</p>	
Project Design	<p>6. Is (are) the baseline project(s), including problem(s) that the baseline project(s) seek/s to address, sufficiently described and based on sound data and assumptions?</p>	<p>3-7-13 There is no baseline-project. There is a list of previous GEF-Biosafety projects (NBF, CHM-I and CHM-II) but not of baseline project. What is the project or projects on which this GEF investments will be standing and adding incremental funding?</p> <p>7-29-13) The baseline project is very weak. This new MSP may provide further tracking to the efforts in Venezuela to comply with the provisions of the CPB.</p> <p>Cleared</p>	<p>6-30-16 There is baseline information (i.e. background) in Annex A (Logical Framework). At PIF stage there was a request for further information on the "Baseline Project", that is the projects/investments that will take place whether or not the GEF funds get approved. Please summarize the Baseline Project in a new paragraph under A.5 p.10-11.</p> <p>9-29-16 Cleared</p>

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	<p>7. Are the components, outcomes and outputs in the project framework (Table B) clear, sound and appropriately detailed?</p>	<p>3-7-13 The structure of the project is adequate. What is not clear is if Venezuela needs all these investments in light of its current record on the use and transit of GMOs and official policies (see above). Please address this matter.</p> <p>7-29-13 See entry in item 5. Cleared</p>	<p>6-30-16</p> <p>Please clarify the following items. Please elaborate on the subjects to better what they actually mean in reality once the project is in place.</p> <p>1. Investments in LMO detection equipment and supplies. Not clear why there is request for infrastructure (Appendix 2, p. 41) when at the same time, the Government already paid for that (A.5 p. 10 "For this reason, the design and construction of a Laboratory of Reference for Detection of LMOs has been covered with local financing; nonetheless, it is not operational due to the need of specific equipment and trained personnel".</p> <p>2. The budget for equipment (\$430K) is low for the list of pieces included in the Appendix. Is there an actual budget for the proposed purchases? Please provide it if so. It is also low compared to the budget for Consultants (\$235K). Please re-evaluate the allocation of financial resources among the items under Appendix 2 starting on page 37 that includes funds for Facilities (\$298K on p.41).</p> <p>3. Please explain how the synergies mentioned on p.13 will be executed ("In particular synergies will be sought with ongoing biosafety project in: Peru, Ecuador, Panamá and the Caribbean) when this project is already completed.</p>

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			9-29-16 Cleared
	8. (a) Are global environmental/ adaptation benefits identified? (b) Is the description of the incremental/additional reasoning sound and appropriate?	3-7-13 The Global Environmental Benefits associated with the implementation of the Cartagena Protocol are difficult to determine and this project with emphasis on capacity building did not try to determine them. Cleared	6-30-16 Cleared
	9. Is there a clear description of: a) the socio-economic benefits , including gender dimensions, to be delivered by the project, and b) how will the delivery of such benefits support the achievement of incremental/ additional benefits?		6-30-16 Cleared
	10. Is the role of public participation, including CSOs, and indigenous peoples where relevant, identified and explicit means for their engagement explained?	3-08-13 There is no reference to the ban on GMOs announced by the former President. Has the ban been lifted? Please elaborate of the case. 7-29-13 Properly addressed in the revised PIF. See Response to GEF Comments and entry under item 5. Cleared	6-30-16 Cleared
	11. Does the project take into account potential major risks, including the consequences of climate change, and describes sufficient risk mitigation measures? (e.g., measures to enhance climate resilience)	3-8-13 If this project is endorsed by the Government of Venezuela, why is "a lack of will and coordination with the NCA to effectively participate in the project" a risk?	6-30-16 How is going to cover the recurrent costs of the project once the GEF project is completed (i.e. personnel, maintenance of equipment and supplies).

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		<p>What does it mean that "It is possible that GEF funds are not readily available for the execution of the project"?</p> <p>7-29-13 Cleared</p>	<p>9-29-16 Cleared</p>
	<p>12. Is the project consistent and properly coordinated with other related initiatives in the country or in the region?</p>	<p>3-8-13 In addition to the GEF-UNEP projects on Biosafety and the CHM, what other initiatives are currently underway on GMOs in Venezuela? On page 10 there is reference to ".....287 researchers working in agrobiotech....and approximately 52 technologies. Genetically modified plants have been produced in different public research institutions, and have been used in confined field trials, following biosafety norms". Where are these entire activity taken place? There is a disconnect between these statements and the position of the Government judging from the position on GMOs in the Biodiversity Strategy.</p> <p>7-29-13 Baseline project is very weak. Not clear if there is a much R&D on GMOs as stated in the PIF. This needs to be clarified during project development. Cleared</p>	<p>6-30-16 What is the name of the Laboratory to benefit from the GEF funds? The name does not appear in the list of Stakeholders.</p> <p>9-29-16 Cleared</p>
	<p>13. Comment on the project's innovative aspects, sustainability, and potential for scaling up.</p> <ul style="list-style-type: none"> Assess whether the project is innovative and if so, how, and if not, why not. 	<p>3-8-13 On the sustainability issue. Although in the PIF there is reference to several government institutions involved in biosafety and actively participating in the drafting of this proposal, it is not clear what these institutions are and what their</p>	<p>6-30-16 Cleared</p>

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	<ul style="list-style-type: none"> Assess the project's strategy for sustainability, and the likelihood of achieving this based on GEF and Agency experience. Assess the potential for scaling up the project's intervention. 	<p>commitment is to make this project sustainable beyond the time and budget of the GEF project. Please elaborate.</p> <p>7-29-13 See page 9 pf revised PIF. Cleared</p>	
	14. Is the project structure/design sufficiently close to what was presented at PIF, with clear justifications for changes?		6-30-16 Yes Cleared
	15. Has the cost-effectiveness of the project been sufficiently demonstrated, including the cost-effectiveness of the project design as compared to alternative approaches to achieve similar benefits?		6-30-16 Cleared
Project Financing	16. Is the GEF funding and co-financing as indicated in Table B appropriate and adequate to achieve the expected outcomes and outputs?	<p>3-8-13 It is not clear why Venezuela wants to invest \$2M from its STAR allocation to support the CPB when GMOs do not appear central to the Government's policies. Indeed, the position of the Government is of opposition to GMOs.</p> <p>7-29-12 See entry under item 5 Cleared</p>	<p>6-30-16 Not clear if GEF's \$1.8M will be sufficient considering the investments requested for equipment. Please address imbalances in budget as stated in the review. May want to reduce Component 1 and 2 in favor of component 4. Proper budgeting of the equipment should facilitate decisions on this matter.</p> <p>9-29-16 Cleared</p>
	17. <u>At PIF</u> : Is the indicated amount and composition of co-financing as indicated in Table C adequate? Is the amount that the Agency bringing to the project in line with its role?	<p>3-8-13 The agency is not bringing any co-financing to this project. The co-financing is all in-kind. While this type of co-financing is acceptable, not having co-financing in cash is worrisome.</p>	<p>6-30-16 The LoC is for \$2,072 in-kind + cash. In contrast, the MSP states that in-kind is \$572,000 and cash is \$1,500,000. Please provide the letter of co-financing where there is disaggregation of the funds, or</p>

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	<p><u>At CEO endorsement</u>: Has co-financing been confirmed?</p>	<p>If there is no co-financing in cash, this is likely to end up being a standalone project. This situation is aggravated by the fact that there is no baseline project.</p> <p>7-29-13 Cleared</p>	<p>include all \$2,070,000 in-kind in MSP.</p> <p>9-29-16 Cleared</p>
	<p>18. Is the funding level for project management cost appropriate?</p>	<p>3-08-13 It is 8% of the Total Project Cost. Agency fee needs to be 9.5% (it is currently 10%)</p> <p>7-29-13 Cleared</p>	<p>6-30-16 Cleared</p>
	<p>19. <u>At PIF</u>, is PPG requested? If the requested amount deviates from the norm, has the Agency provided adequate justification that the level requested is in line with project design needs? <u>At CEO endorsement/ approval</u>, if PPG is completed, did Agency report on the activities using the PPG fund?</p>	<p>7-29-13 Cleared</p>	<p>6-30-16 No. Please explain how the \$54,714 requested for the PPG but not used because it was cover with co-financing, will be used to "..... support project activities during the first year, in particular: project inception meeting, and lobbying with other NCAs to secure support to the project, in particular to minimize potential risks associated to political changes. In addition, activities to strengthen the mapping of actors in biosafety will be undertaken with these funds". (P. 26). The budget in Annex F-1 is for \$1,860,000 as stated in the project and does not include the \$54,714.</p> <p>9-29-16 Cleared</p>
	<p>20. If there is a non-grant instrument in the project, is there a reasonable calendar of</p>	<p>NA</p>	<p>NA</p>

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	reflows included?		
Project Monitoring and Evaluation	21. Have the appropriate Tracking Tools been included with information for all relevant indicators, as applicable?		6-30-16 Yes Cleared
	22. Does the proposal include a budgeted M&E Plan that monitors and measures results with indicators and targets?		6-30-16 Cleared
Agency Responses	23. Has the Agency adequately responded to comments from:		
	• STAP?		
	• Convention Secretariat?		
	• The Council?		
	• Other GEF Agencies?		
Secretariat Recommendation			
Recommendation at PIF Stage	24. Is PIF clearance/approval being recommended?	3-8-13 No. Please address outstanding issues under items 4,5,6,7,10-18. Thanks. 7-29-13 Yes. This PIF is recommended for approval.	
	25. Items to consider at CEO endorsement/approval.	7-29-13 Provide a table relating proposed activities by Component with Baseline projects including the name of responsible the Government office (research and development for Component 4).	
Recommendation at CEO Endorsement/ Approval	26. Is CEO endorsement/approval being recommended?		6-30-16 No. Please address outstanding issues under 6,7,11,12,16,17 and 19

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			2-22-17 Yes. This project is recommended for approval.
	First review*	March 08, 2013	June 30, 2016
	Additional review (as necessary)	July 29, 2013	February 22, 2017
Review Date (s)	Additional review (as necessary)		

* **This is the first time the Program Manager provides full comments for the project. Subsequent follow-up reviews should be recorded. For specific comments for each section, please insert a date after comments. Greyed areas in each section do not need comments.**