



Biodiversity protection through the Effective Management of the National Network of Protected Areas

Basic Information

GEF ID

10351

Countries

Comoros

Project Title

Biodiversity protection through the Effective Management of the National Network of Protected Areas

GEF Agency(ies)

UNDP

Agency ID

UNDP: 6257

GEF Focal Area(s)

Biodiversity

Program Manager

Sarah Wyatt

PIF

Part I – Project Informatics

Focal area elements

1. Is the project/program aligned with the relevant GEF focal area elements in Table A, as defined by the GEF 7 Programming Directions?

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

Yes, thank you.

10/23/2019

Yes. However, please note in the paragraph after Table F that these are programming lines, not different focal areas. The line on "Further develop biodiversity policy and institutional frameworks" is meant for work related to the Cartagena and Nagoya Protocols and NBSAPs and, therefore, does not apply here.

Agency Response Thank you. Have deleted the Reference to "III. Develop Biodiversity policy..." on page 6.

Indicative project/program description summary

2. Are the components in Table B and as described in the PIF sound, appropriate, and sufficiently clear to achieve the project/program objectives and the core indicators?

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

Yes, thank you for the revisions.

During PPG:

1. Please note that the GEF is not the financial mechanism for CITES. Therefore, significant work on legislation is not eligible for GEF funding even though PA enforcement that includes CITES is.
2. For component 1.1.4, please ensure that resources are available for the implementation of at least some of the activities recommended by the sustainable financing plan. The GEF has funded many plans that don't receive resources for implementation and end up waiting on another GEF project and need resources for updating as well as implementation.

10/23/2019

No, please address the following issues:

- We understand that there is an existing project on PAs with UNDP that is currently coming to a close. We think it would be important to include how the results of the TE will be incorporated into project design during the PPG.

Component 1:

- Some of the threats mentioned such as road development and fisheries concessions are quite significant and are being pushed by other ministries. Dialogue is a good tool, but may not be sufficient in changing the perspectives of infrastructure and development focused ministries. How will the activities of the project seek to address these issues?
- 1.1.1 - The GEF is not the financial mechanism for CITES and trade is not listed as a threat in the introduction. We understand that this is part of a larger effort, but can you please provide a few sentences on the focus of this work?
- 1.1.1 - Lack of effective enforcement of PA protections is listed as a major threat. It is unclear how this will actually be improved through the project activities.
- Plastic pollution - Please note that the GEF does not support solid waste management activities as these are generally considered local environmental benefits. While coordination with the GEF ISLANDS programs is welcome, this project cannot support solid waste management. It can be supported through cofinancing. Certainly, the creation of biodiversity friendly businesses that make use of waste is welcome. However, it will be important to make sure that those businesses are not dependent on unsustainable practices in the first place that could/should be fixed in the shorter term and, therefore, make the business nonviable.

Component 2:

- CEPF and Blue Ventures are not themselves CSOs that the project would be engaging as described and are not on the ground CSOs. Please clarify this.
- The METT doesn't exactly capture "conservation successes" nor number of people participating in co-management. Number of participants could be a good indicator, but it would be better to some sort of threshold for quality of participation not just that they attended a workshop.

- 2.1.2 and 2.13 - These read more as outcomes than outputs.

Component 3

3.1.1 - It seems that such a study would also be very helpful at a national level in supporting the goals of this project. Will it have any relationship with the activities in component 1? It will be important to focus this work (that can be come expensive and overly technical) based on the needs of the community and the intended audiences.

3.1.3 - While we understand that "artisanal" may be a cognate of the ministry, the choice seems a bit odd as it sounds like this is focused on handicrafts. Is the point to create highly specialized industries and value chains (as is implied by this word choice in English)? If so, what sort of market research will be done to ensure that the products developed have a market and way to get to market? For things related to tourism, is there sufficient tourism of the right type to support such ventures? USAID has a helpful set of tools on conservation enterprises that would be good to apply to these activities. It will also be important to consider unintended consequences of product development and learn lessons from other projects around the world.

3.1.3 - "Enhance the value of natural forest.." is also somewhat confusing. What is meant by this? How do we ensure that this does not lead to further forest degradation when certain products become more valuable?

3.1.5 - It's unclear whether the measure of "number of training events..." is an appropriate or effective indicator to get at what the project is trying to do. It seems that the project would do better as a match maker and support the development of new and nascent private sector rather than setting up a dichotomy between community and private sector. Some of the approaches undertaken by SGP in St Lucia might be interesting to this project and during PPG it would be worth having a discussion with the country director.

3.1.5 - This seems principally focused on joint ventures which is a dichotomy between private sector and communities. Is this because community-based private sector initiatives are covered in 3.1.2? Please clarify.

Text - The reference to watershed management and CCM is quite unclear and how it relates to this work.

We will note that the footnotes are quite helpful in providing needed explanations without overloading Table B. Thank you.

Agency Response

Project GEF ID 10351 will close out in April 2021 – accordingly a TE will not be available during PPG.

However, the PIF has incorporated recommendations from the Mid Term Review of Project ID 4950 and notes that this GEF7 project builds on the successes and gaps identified. As the ProDoc is developed during PPG, the recommendations will be further developed into specific activities that will, *inter alia*, enhance the effective involvement of communities in the co-management process (Recommendation #1), focus on securing additional funding to capitalize the FEC (Recommendation #2), seek to involve other projects in PA management activities (Recommendation #6), and actively work to strengthen environment and PA-related laws and their enforcement (Recommendation #9).

The 4 Components outlined in the GEF7 project will be developed further into the ProDoc and CEO ER during PPG and a note has been added to the PIF regarding the need to incorporate the Recommendations from the Mid Term Review (page 12 in the PIF).

Component 1:

- i. The mention of 'fisheries concessions' has been removed from the PIF on page 13, particularly as these do not affect the PAs targeted by the Project. Fisheries activities at project sites are more 'artisanal' and do not present the same degree of threat (destructive fishing practices are noted in the PIF as being localised threats).
- ii. The project will focus on activities that will strengthen the new legal framework for Protected Areas in Comoros. The new PA Law was recently submitted to the Union Assembly to the Office of the President of the Republic and its promulgation will be the next step in the process to adopt legislation and text for application of the Law.

Activities are currently underway with the communities and the Government of Comoros through Project GEF ID 10351 and include assisting with preparations for the enforcement of the new law, including the specific requirement under the Law that environmental impact studies should be carried out for any infrastructure development (such as roads) within the PA areas. An environmental impact study has been carried out regarding the road construction that links the villages of Dindri and Lingoni and passes through the Mont Ntringui Park and mitigation measures have been proposed, including a) planting *Pterocarpus indicus* along the entire road to reduce erosion risk and restore those trees that were destroyed when the road was built. These activities will be carried out by the Staff of Shissiwani and Mount Ntringui NPs, Anjouan Police and villagers neighbouring the NP. The Mont Ntringui NP team is monitoring the replanted trees on a monthly basis (and sending reports to Anjouan environmental agency) and is limiting access to Lake Dzilandzé by farmers who are using the road to access the lake more easily. These activities are likely to continue through the PPG and into the project itself.

Text to this effect has been added on pp 13 in the PIF, as follows:

Additionally, there is concern amongst key community stakeholders that cross-sectoral ministerial engagement on issues that affect PA management and integrity are unclear, for example with regard to plans at the Ministry of Transport to develop the road infrastructure on the islands; the Project will address this through ensuring strategic inter-ministerial dialogue happens from the outset, as well as ensuring that the obligatory Environmental Impact Studies (required under the new PA Law) for any new infrastructure development (such as roads) within the PAs are carried out.

1.1.1

Looking at CITES legislation within the Comoros will ensure that all biodiversity trade related policies are reviewed and incorporated into project activities. Ensuring that CITES listings of key biodiversity is taken into account when developing biodiversity-friendly value chains (which could include sustainable use of CITES-listed species – species to be identified during PPG but could include reptiles and amphibians and various flora species).

Consultations with CITES Secretariat indicate that efforts may be made with Comoros during the project lifetime to link with project activities on ensuring coherent legislative framework for protection of biodiversity within the PA system. Knowing the species that can or cannot be traded under CITES is important also for any biodiversity-based value chains that may be developed (which will be researched in greater detail during PPG). Stakeholder consultations noted that it is important to ensure that all value chain options were considered and that market options were left open such that the best 'deal' for nature and for people could be achieved through the project (Component 3). As noted in the PIF: *The Comoros became a party to CITES in February 1995 and is currently included in Category 3 under the CITES National Legislation Project. The CITES Secretariat's latest update indicates that the Comoros is in the process of drafting revised legislation, but this is not yet finalised. As a longstanding Party with national implementing legislation still in Category 3, the country risks increased scrutiny and pressure to ensure that CITES-appropriate national legislation is in place, which could jeopardise any potential income-generating activities based on the sustainable use of CITES-listed species.*

Additional text has been added to the PIF to clarify this issue as Footnote 2 on page 1 as follows:

The Comoros is included in Category 3 under the CITES National Legislation Project and potentially subject to increased scrutiny and pressure to ensure compliance with ratification of the Convention, with potential consequences on value chains that could be developed based on CITES-listed species (Component 3). National CITES legislation and associated implementation mechanisms could also be key supplementary tools for the conservation of CITES-listed species that exist in the target PAs and assist with decision-making on zoning for enhanced biodiversity protection (Component 2).

1.1.1.

Efforts have been made through Project GEF ID 10351 to operationalize the nascent PA system and support considerable collaboration with communities (awareness-raising and skills transfer). These efforts will be continued into and developed further during the GEF7 project, together with application of various lessons learned and recommendations from the MTR. The new PA Law and associated texts that govern the creation and management of the PAs, together with the newly created PA Agency, will be supported by the Project and the co-management approach (with communities) will constitute the lever for the PA protection.

Project activities will be developed during PPG taking into consideration the National Strategy for the Expansion of the PA Network (2017-2021), which was referenced and incorporated into the PIF. Actively protecting PAs is a fundamental and key strategic axis of the National PA Strategy, which notes that eco-guards, Rangers, Conservation Officers, as well as the PA Agency personnel, will take part in multiple training events in order to "master their rights and duties". The Strategy indicates that trained eco-guards will ultimately be sworn in as Judicial Police Officer (OPJ). The Strategy further plans to develop a confidential monitoring plan for improved enforcement and monitoring

by patrol teams. Training and capacity building activities will address PA co-management needs, techniques and methods, and participants/recipients of the training will be targeted based on their responsibilities for public awareness and enforcement of the new Laws relating to PAs.

As noted in Footnote 1 (page 1) of the PIF, the Co-management Committees per National Park comprise representatives from various sectors affected by the NP, including: community representatives from the villages in the NP, Mayors from the Municipalities, representatives from the DGEF, Science Faculty, Gendarmerie, Police, Coast Guard, National Tourism Office, Chamber of Commerce.

. Plastic pollution – the plastic pollution in Comoros is severe and is mentioned in the PIF in terms of potential ecotourism value chains, where any value chain analysis will highlight the high levels of pollution across the islands and avoid worsening the situation. It is not anticipated that any project funding will be allocated to solid waste management activities and this will be made very clear during ProDoc development. The project will work in coordination with other UNDP and Government projects that are addressing the issue.

ii. ISLANDS program - The project will not be addressing solid-waste management, but it is recognised that the project will have linkages to the activities that are planned under ISLANDS. The integrated management system that will be put in place will enable the development of waste recovery activities for the production of compost or plastic-based craft products. Coordination with the project will thus enable the development of income-generating activities for riverine communities and replicate the recovery mechanism that will be adopted in PAs.

iii. Small businesses based on 'waste'. Thank you for this important point – we shall make sure that this is taken into consideration when developing the Initiation Plan and ToRs for the 'Livelihoods & Value Chain Specialist' to be contracted for development of the ProDoc during PPG. Also, this will be addressed in more detail under Component 3. It is worth noting that discussions were held with the Director of the Maison de l'Artisanat at the Ministry of Economy and she noted that small businesses using waste matter are already being developed with their support (such as car tyres recycled into plant holders and waste bins by the Municipality). A specific request was made by the Maison de l'Artisanat to consider the use of waste materials (including waste newspapers, cement/rice sacks). One of the main aims of working with the Maison de l'Artisanat is to revive the apparent lost skill in artisanal handicrafts.

Component 2:

. Thank you – it is correct that CEPF does not have a national office representative; the individual consulted during PIF preparation is in close contact with the UNDP Country Office, and is the national representative of the Tany Meva Foundation (based in Antananarivo, Madagascar), which provides funding for specific projects on the ground. Tany Meva Foundation issues a call for proposals in Comoros and final funding decisions are taken by Tany Meva in MG. Reference to CEPF has been removed from the PIF.

During PPG, the larger and more traditional conservation and development NGOs will be contacted and researched in more detail. The Comoros falls under the project portfolio of WWF-MG, which has selected the North Mozambique Channel and islands as a target site for project interventions; this includes the Comoros islands.

ii. Thank you for the clarification. Indeed, Blue Ventures (BV) collaborates with and works in the Comoros through its partner NGO, Dahari (since 2015). The aim of BV/Dahari is to conserve marine resources and improve local livelihoods through community-based fisheries management. Although BV provide support mainly to Dahari, they are currently exploring to expand that support to other local organisations, but are not planning to implement activities directly. BV also collaborates with governmental institutions in the Comoros, such as the Fisheries Directorate to harmonize approaches and create synergies as much as possible, especially in areas where projects overlap.

The PIF has been amended to reflect that Blue Ventures is not based in Comoros by deleting reference to BV (Footnote 7 on page 3 and text on page 13).

METT:

Thank you. The wording and description of the METT as an indicator and target for Component 2 has been amended on page 3 from:

Number of people participating in new models of co-management (target being increased conservation successes as captured by METT)

To: ...number of people participating in new models of co-management (target being progress in improved management effectiveness at target PA sites, as measured by the scoring system in the METT).

In addition, the baseline METT provided is the score given to the PAs in the Mid-Term Review of Project ID 4950 (as noted in Annex B to the PIF).

ii. Training (eg on biodiversity and PA management, annual refresher courses, training-of-trainer sessions, etc) targets many different co-management actors, including the EcoGuards, Co-management Committees, Ministry personnel, as well as the communities (as 'eco-guards' and patrol scouts) and municipal police. Each community has a representative that has been nominated by the Village Communities (30-40 people per village) and these nominees are participating in the training events. They then share their knowledge learned with the rest of the village/community. Other actors include Local Civil Protection Units, the *Gendarmerie*, Students at the Faculty of Science, particularly those students following Masters in Biodiversity. A footnote 6 has been added to the PIF on page 3 to clarify the 'quality' of participants.

2.1.2 and 2.13 -

Thank you. Outputs 2.1.2 and 2.1.3 have been amended and effectively combined into one single Output, which reads as follows:

2.1.2 Management tools (including species management plans for key terrestrial and marine species) are drafted, approved and applied at target sites within the nascent PAs.

The Footnote 8 associated with Output 2.1.2 has been amended (page 3) and now includes the text that was previously in Footnote 9. The original Footnote 9 has been deleted in the PIF (page 3).

Please also note that numbering for Output 2.1.4 has now been changed to Output 2.1.3 (highlighted on page 2 in the PIF).

Revised text has also been inserted in the Section 3. Alternative scenario, to reflect the changes made in Table B, Component 2, output 2.1.2. Amended text is highlighted on page 13 and reads as follows: (ii) management tools (including species management plans for key terrestrial and marine species) are drafted, approved and applied at target sites within the nascent PAs; (iii).

Component 3:

3.1.1

Thank you – yes, a nationwide study will be extremely valuable. To the extent possible – will be further quantified/qualified during PPG – such a study could cover a considerable landscape but the main purpose under Component 3 is to conduct an Ecosystem Services study to provide supplementary information to Value Chain studies to be conducted at the target sites. As the Reviewer notes, Ecosystem Service studies can be expensive.

As noted in the PIF (page 14), during PIF preparation, a clear request was made to include activities that demonstrate the value of the ecosystem services provided by the PAs and communicate this to the stakeholder communities for enhanced and informed decision-making.

3.1.3:

i. 'Artisanal' – development of small enterprises but not limited just to artisanal efforts; this will be one of the various options that will be investigated.

As plastic bags have been banned in Comoros, there is a need for baskets/bags made from other materials (eg raffia/straw/recycled newspaper/etc) for all Comorians to use. There is a strong national market demand that needs to be researched and quantified and this will take place during PPG. The skills for 'artisanal' production is very limited in Comoros and most products are imported from eg Madagascar

(for products made from raffia) and Dubai (for products that are purchased in quantity for the "*Grand Mariages*").

ii. Market research – as noted in the PIF (page 14), a value chain specialist will be contracted to research not only the natural resources that can be developed into micro-enterprises, but also research the entire value chain from source to shelf, ie including markets, both real and emerging/potential.

iii. Tourism - tourism is currently limited in Comoros, but the Government's Tourism Strategy demonstrates the will of the Government to rectify this and encourage tourists to the islands. This will involve efforts to strengthen the country's competitive advantage within the sector and position the islands as a destination of choice for tourists. These are clear challenges for the Government, but a confirmed priority.

iv. Tourism and USAID toolkit - thank you, the toolkit will be useful to research and reference during PPG. A high quality ecotourism value chain expert has already been identified to assist with this aspect during PPG. The GuC has a Tourism Strategy – as noted in iii. above and on page 14 of the PIF – and the project will liaise with GuC on this aspect of the Component 3 during project implementation. Further details will be provided during PPG.

iv. Unintended consequences and lessons learned – thank you. This will be included in ProDoc development during PPG.

3.1.3

The project is addressing forest protection through Component 2. The community representatives who will be co-managers of the 'natural forest' will be members of the same villages and communities where value chains will be developed, some of which could be based on natural resources occurring in a 'natural' ie protected forest. Ecotourism ventures are a potential value chain that would rely on an intact or high-value natural forest that would include management plans stipulating the requirement for reduced, even halted, forest degradation. Management plans being developed under Components 2 and 3 would also include requirements for sustainable offtake, as well as ensure that monitoring and traceability of any use is indeed legal, sustainable and verifiable. It is not clear at PIF stage what these markets could be and an expert Natural Resource value chain specialist will be hired during PPG to perform an in-depth analysis with recommendations and necessary precautionary advice.

3.1.5:

. The indicator that notes *number of training events on financial accounting and negotiations with private sector and investors* has been changed to reflect the need for targeted training materials on financial accounting and negotiation skills. Indicator now reads: training materials produced that focus on financial accounting and negotiation skills. Please see page 4.

ii. Dichotomy between community and private sector – we have mentioned in the PIF that the community, fishers and some people in associations can be considered as ‘private sector’ also (Section 4. Private sector engagement, page 20 in the PIF). We have noted that the enterprises set up may involve cultivation of vegetables and food-stuffs that are needed on the national market and that this would effectively ‘create’ a new private sector within communities, as well as establish linkages with potential ‘new’ private sector in-country and in the region (inter-island trade, as well as trade among the Western Indian Ocean Islands)

iii. Watershed management and CCM – as noted in the PIF, watershed management underpins activities described under Component 3 where the islands promote climate change mitigation; accordingly, the Project will work in tandem with other projects being undertaken on watershed management (UNEP-GEF project with MEAF) and CCM (UNDP GCF project) being carried that address these issues. Text updated on page 14 of PIF.

This output is key to enable communities to make co-management decisions, as the connection between conservation of ecosystem services and values of biodiversity has not been adequately addressed, although the linkages between deforestation and water supply and land degradation are recognised.

Co-financing

3. Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines, with a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized?

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

Yes.

10/23/2019

No, the financing from AFD and WB is surprising to see listed as in-kind and recurrent expenditure. Can you please clarify this? From the WB, it should probably be listed as a loan as well.

Agency Response

Co-financing Table

- i. AFD co-financing amended to 'Grant' – as noted in Footnote 46, the AFD has committed a total of Euros 6 million to MNP conservation activities, as well as Euros 1.5 million to the FEC. Table C updated.

- ii. WB co-financing will be negotiated in further detail during PPG but it is anticipated that there will be linkages through WB projects addressing ecotourism, access to markets, and fisheries. It is highly likely that the co-financing from WB will be part 'Grant' and part 'In Kind' and the table has been amended accordingly (Page 5).

All co-financing will be confirmed during PPG.

GEF Resource Availability

4. Is the proposed GEF financing in Table D (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

The STAR allocation?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes. Comoros is a fully flexible country and is using their flexibility to apply LD and BD resources for this project.

Agency Response

The LDCF under the principle of equitable access

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

Impact Program Incentive?

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

Project Preparation Grant

5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

Core indicators

6. Are the identified core indicators in Table F calculated using the methodology included in the correspondent Guidelines? (GEF/C.54/11/Rev.01)

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

Yes.

10/23/2019

No. It would be good to have clarity on the fact that these people all live within the PAs. If not, then there should be numbers included in the mainstreaming indicators.

At PPG, it would be good to include the carbon benefits for this project.

Agency Response

Core Indicators:

People living within the PAs. The maps in Annex A show the delimitations of the New PAs, together with a table listing the number of habitants per village within the PA boundaries. A note has been added to the text under the Table of Core Indicators on page 6 as follows:

The populations at the NP sites where the project will be carried out, and are dependent on natural resources [a breakdown of human population numbers per village within the PAs is shown in Annex A]

ii. Thank you and Noted - Carbon Benefits for the project will be included in the ProDoc development during PPG.

Project/Program taxonomy

7. Is the project/ program properly tagged with the appropriate keywords as requested in Table G?

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

No, these changes need to be reflected in the Portal entry. Please make the Portal entry a clean version.

10/23/2019

No. This project is not part of the Impact Programs and, therefore, should not select the Integrated Programs keywords. Also, the conservation trust funds does keyword does not appear relevant perhaps sustainable finance is more appropriate. These are meant for effective record keeping and retrieval for the GEF, so there is no need to select so many keywords.

Agency Response

Noted and amended – please see highlighted changes in new Taxonomy Worksheet in Annex C in revised PIF.

7 Nov 2019

The portal entry for Taxonomy has been amended accordingly.

art II – Project Justification

1. Has the project/program described the global environmental / adaptation problems, including the root causes and barriers that need to be addressed?

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

Yes.

10/23/2019

No, as mentioned above please discuss trade if the project is going to address it.

Agency Response

Text has been added to the PIF, highlighted on page 10 to ensure that the following is captured in the justification (also noted in the comment for 1.1.1 above):

Looking at CITES legislation within the Comoros will ensure that all biodiversity trade related policies are reviewed and incorporated into project activities. Ensuring that consideration of CITES listings of key biodiversity is taken into account when developing biodiversity-friendly value chains (which could include sustainable use of CITES-listed species – species to be identified during PPG but could include reptiles and amphibians and various flora species).

Consultations with CITES Secretariat indicate that efforts may be made with Comoros during the project lifetime, which would link to project activities on ensuring coherent legislative framework for protection of biodiversity within the PA system. Knowing the species that can or cannot be traded under CITES is important also for any biodiversity-based value chains that may be developed (which will be researched in greater detail during PPG). It was considered to be important to ensure that all value chain options were considered and that market options were left open such that the best 'deal' for nature and for people could be achieved through the project (Component 3).

2. Is the baseline scenario or any associated baseline projects appropriately described?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes. However, please note that there are 36 biodiversity hotspots and coelacanths are no longer considered endemic to the West Indian Ocean.

Agency Response

Noted and changed to 36 global biodiversity hotspots on page 16.

Coelacanth – reference to endemism removed on page 17 and the sentence now reads: The Coelacanth *Latimeria chalumnae* is of global interest as a 'living fossil' and is listed as Critically Endangered on the IUCN Red List.

3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

4. Is the project/program aligned with focal area and/or Impact Program strategies?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

5. Is the incremental / additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

Yes.

10/23/2019

No, the baseline should focus on existing or planned investments and projects in this area and the GEF's role in supporting the incremental costs.

Agency Response

Following text has been added to the PIF on page 15:

Recognising the urgency to protect key biodiversity sites and safeguard remaining natural capital, the Government of the Comoros has made considerable investment in the creation of a network of Protected Areas as the principal means to protect the unique and endangered biodiversity on the islands whilst also ensuring continuous means to support the livelihoods of the communities. This baseline investment by the Government of the Comoros and donor agencies also includes the creation of the Comoros National Parks, an agency specifically focused on management of the Protected Area landscape, as well as the hiring of personnel, the provision of basic infrastructure, and operational costs. Still in its early phase, the Comoros National Parks is establishing a robust baseline for future investments and continued inputs to managing the Parks landscape.

-

The GEF project will complement baseline investments by the Government of the Union of Comoros to improve management of the new Protected Area network by addressing three problem areas where gaps have been identified (see the baseline scenario above): i. insufficient inter-sectoral knowledge and coordination of legal mechanisms for conservation resulting in poor law enforcement, continuous land degradation, encroachment and destructive harvest practices; ii. inadequate management capacity and tools for the protection of biodiversity and co-management of natural resources in the new Protected Area landscapes leading to uncontrolled incursions into protected landscape (marine and terrestrial) and declines in local species; iii. Failure to provide legal alternative income-generating activities for communities affected by the creation of the new PAs, thereby lessening anthropogenic pressures on the resources whilst guaranteeing livelihoods.

The incremental approach of the project will be to: a) reduce the threat from encroachment and further degradation of the UoC's Protected Area Network (PAN) through application of effective co-developed park protection protocols, thereby allowing the stabilisation and, ultimately, recovery of the biodiversity of these areas; b) strengthen management of the PAN through effective and improved engagement of, and co-management with, communities to achieve biodiversity conservation goals; and c) reinforce the Government's policy for community engagement in PA management and conservation; and d) build on the Government's commitment (in its PA Expansion Strategy) to provide communities within the PAs with livelihood options compatible with nature.

6. Are the project's/program's indicative targeted contributions to global environmental benefits (measured through core indicators) reasonable and achievable? Or for adaptation benefits?

Secretariat Comment at PIF/Work Program Inclusion

10/29/2019

Yes.

Agency Response

7. Is there potential for innovation, sustainability and scaling up in this project?

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

Yes.

10/29/2019

No, it would be good to discuss plans to learn from and scale up the community engagement and private sector activities described in this project.

Agency Response

The project is being piloted at target sites – successes and lessons learned will be shared and the possibilities for replication and scaling up will be addressed from the outset. This project is a natural follow-on from the PIMS ID 4950 project and will be focusing on enhancing sustainability for the new Protected Areas Agency to manage the PA Network effectively into the future. Communities and government officials have been integrated into Project ID 4950 and this GEF7 project will continue to work with these key government stakeholders.

With regard to the private sector, many value chain studies have been carried out in Comoros, but not all have been 'actioned'. The successful ventures have included development of the high-value ylang ylang distillation industry as well as the nascent ecotourism industry. As the PIF notes (footnote 4, page 4 and footnote 49, page 14), efforts will be made to strengthen the link with the Vanilla Islands Association, which comprises the official tourist authorities of Mauritius, Reunion, Madagascar, Mayotte, Comoros and Seychelles, and is responsible for the creation and promotion of combined inter-island tourism. This linkage – and with private sector entities interested in niche ecotourism markets (a specialist ecotourism value chain expert will be contracted during PPG to elaborate on this for ProDoc development) – will benefit many more PAs and sites across the Comoros, beyond the pilot target sites, particularly with regard to development of public-private partnerships that promote ecotourism to the new National Parks.

The following text has been added to page 18 in the PIF: With regard to the private sector, many value chain studies have been carried out in Comoros, but not all have been acted upon and developed into actual businesses. Successful enterprises have included the high value ylang ylang distillation industry as well as the nascent ecotourism industry. Project activities to strengthen the link with tourism promoters and private sector entities interested in niche ecotourism markets will benefit many more PAs and sites across the Comoros, beyond the pilot target sites, particularly with regard to development of public-private partnerships that promote ecotourism to the new National Parks.

Project/Program Map and Coordinates

Is there a preliminary geo-reference to the project's/program's intended location?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

Stakeholders

Does the PIF/PFD include indicative information on Stakeholders engagement to date? If not, is the justification provided appropriate? Does the PIF/PFD include information about the proposed means of future engagement?

Secretariat Comment at PIF/Work Program Inclusion

11/6/2019

Yes, we note the impressive upstream community consultations that have occurred.

10/29/2019

Yes. It would strengthen the PIF to describe a bit more the discussions that have happened with communities on this project.

Agency Response

The stakeholder consultations regarding this project are extensive and meetings were held across the three islands of the Union of the Comoros. During PIF preparation, an Inception meeting was held with key stakeholders, including community leaders, women's associations, CSOs, who were all aware of the project particularly given their active involvement in the PIMS 4950 project. Visits to potential project sites were carried out during PIF preparation (mission report of international consultant are available, noting the participants present, the working group sessions that were held, and the field sites visited). In addition, three separate validation workshops were held to confirm approval of the draft PIF (one validation workshop per island), where it was highlighted that the comments and inputs made by stakeholders at the Inception meeting (summary was provided at the workshop) had been incorporated into the draft PIF. Active engagement by all participants in thematic working groups that were set up led to further refinement of the PIF and secured 100% 'validation'.

UNDP Country Office in Comoros maintains active and engaged relationship with communities.

Gender Equality and Women's Empowerment

Is the articulation of gender context and indicative information on the importance and need to promote gender equality and the empowerment of women, adequate?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes. We look forward to seeing how an inclusive approach is taken in the development of the full project.

Agency Response

Thank you. A gender strategy will be developed during PPG and the project will be developed taking into consideration the GEFSec's review comments and ensure that an inclusive approach is taken.

As noted on page 15 in the PIF, "women in the Comoros are generally included in decision-making processes and benefit-sharing, and profit from a matrilineal society that ensures that women inherit family land, own their own houses and are able to obtain micro-credits for small enterprise creation. However, gaps in empowerment remain and the project will ensure that a gender strategy is formulated that will guide all activities under the Project and that women are included in all capacity building, training, co-development of plans, and participation in all consultations and activities."

Private Sector Engagement

Is the case made for private sector engagement consistent with the proposed approach?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

Risks

Does the project/program consider potential major risks, including the consequences of climate change, that might prevent the project objectives from being achieved or may be resulting from project/program implementation, and propose measures that address these risks to be further developed during the project design?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes. During PPG, it will be important to consider CC effects on potential livelihood activities supported by the project.

Agency Response

Noted and will be included in Initiation Plan and be addressed during PPG.

We have already mentioned that the Project will coordinate with other projects being carried out by UNDP Comoros and others, including climate change [eg Strengthening Comoros capacity to manage potable water resources in the context of climate change (GCF ID FP094, ends 2026 – US\$ 44,299,263). Please see pp 14 and 21.

Coordination

**Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined?
Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?**

Secretariat Comment at PIF/Work Program Inclusion

11/8/2019

Yes.

11/6/2019

No, please remove the following sentence from the PIF - "As a result, it is highly likely that the government will request UNDP to provide select project-specific services, including technical support, procurement, recruitment and payments."

10/23/2019

Yes.

As the agency knows, the implementation and execution roles on GEF projects are meant to be separate per policy and guideline. The GEFSEC will analyze any requests for dual role playing by an agency at the time of CEO endorsement and only approve those cases that it deems warranted on an "exceptional" basis. We strongly encourage the agency to look at third party options as a preferred way forward. We also strongly encourage the agency to discuss any and all options for execution that do not include the government with the GEFSEC early in the PPG phase. The technical clearance of this PIF in no way endorses any alternative execution arrangement

Agency Response

Noted. As indicated in the PIF (page 22), third party options to provide execution services will be analysed during PPG in full consultation with GEFSEC and Government.

As noted in the PIF on page 21, UNDP will explore further during PPG the "options for augmenting the government capacity, including identification of a third-party service provider".

07 Nov 2019

The respective sentence has been removed as requested,

Consistency with National Priorities

Has the project/program cited alignment with any of the recipient country's national strategies and plans or reports and assessments under relevant conventions?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

Knowledge Management

Is the proposed “knowledge management (KM) approach” in line with GEF requirements to foster learning and sharing from relevant projects/programs, initiatives and evaluations; and contribute to the project’s/program’s overall impact and sustainability?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

Agency Response

art III – Country Endorsements

Has the project/program been endorsed by the country’s GEF Operational Focal Point and has the name and position been checked against the GEF data base?

Secretariat Comment at PIF/Work Program Inclusion

10/23/2019

Yes.

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 PIF/Work Program Inclusion

NA

Agency Response

EFSEC DECISION

RECOMMENDATION

Is the PIF/PFD recommended for technical clearance? Is the PPG (if requested) being recommended for clearance?

Secretariat Comment at PIF/Work Program Inclusion

11/8/2019

Yes, thank you for the quick responses.

11/6/2019

Not at this time. There are a few small changes needed as well as ensuring that the PIF in the Portal matches the changes outlined here including keyword tagging.

10/23/2019

Not at this time. Please address the above issues and resubmit.

ADDITIONAL COMMENTS

Additional recommendations to be considered by Agency at the time of CEO endorsement/approval.

Secretariat Comment at PIF/Work Program Inclusion

Review Dates

	PIF Review	Agency Response
First Review	10/23/2019	
Additional Review (as necessary)	11/6/2019	
Additional Review (as necessary)	11/8/2019	
Additional Review (as necessary)		
Additional Review (as necessary)		

PIF Recommendation to CEO

Brief reasoning for recommendations to CEO for PIF Approval