



# REQUEST FOR CEO ENDORSEMENT

**PROJECT TYPE: FULL-SIZED PROJECT**

**TYPE OF TRUST FUND: GEF TRUST FUND**

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## PART I: PROJECT INFORMATION

Project Title:	Development of a national network of terrestrial and marine protected areas representative of the Comoros' unique natural heritage and co-managed with local village communities		
Country(ies):	Comoros	GEF Project ID:	5062
GEF Agency(ies):	UNDP	GEF Agency Project ID:	4950
Other Executing Partner(s):	Ministry of Production, Energy, Environment, Industry and Handicraft (MPEEIH)	Submission Date:	May 19, 2014
		Resubmission:	July 15, 2014
		2 <sup>nd</sup> Resubmission:	August 12, 2014
GEF Focal Area (s):	Biodiversity	Project Duration (Months)	72
Name of Parent Program (if applicable): n/a	n/a	Project Agency Fee (\$):	424,600

### A. FOCAL AREA STRATEGY FRAMEWORK

Focal Area Objectives	Expected FA Outcomes	Expected FA Outputs	Trust Fund	Grant Amount (\$)	Cofinancing (\$)
BD1: Improve Sustainability of Protected Area System	1.1: Improved management effectiveness of existing and new protected areas.	New protected areas (9) and coverage (at least 57,820 ha of terrestrial areas + marine areas) of unprotected ecosystems  Sustainable financing plans (1)	GEF TF	4,246,000	21,630,314
<b>Total project costs</b>				4,246,000	21,630,314

### B. PROJECT DESCRIPTION SUMMARY

**Project Objective:** To establish an expanded and functional system of protected areas (PAs) in the Union of Comoros, representative of the country's biodiversity endowment and with good prospects for a sustainable future.

Project Component	Grant Type	Expected Outcomes	Expected Outputs	Trust Fund	Indicative Grant Amount (\$)	Indicative Cofinancing (\$)
1) PA system strengthened through expansion and capacity building	TA	<i>The Union of Comoros' PA system is expanded through the addition of nine (09) new sites<sup>1</sup> to the estate, affording protection to varied terrestrial, coastal and marine ecosystems, and reaching a total coverage of 98,220 ha, which includes 27% of the land surface of the three islands that are object of this project<sup>2</sup> and at least 47,695 ha of seascapes around them. This PA system will</i>	1.1 <b>A new legal framework for the management of the PA system</b> is approved and its institutional structure is formalized  1.2 <b>Capacity for PA management:</b> PA agency	GEFTF	868,500	5,243,703

<sup>1</sup> The new sites are: Forêt du Karthala (Karthala Forest) with 26,790 ha, containing 2 Community Reserves, namely Hantsogoma (946.4 ha) and Ngubadju (240.6 ha); Forêt humide de Mohéli (Moheli Rainforest) with 16,170ha; Montagnes d'Anjouan - Mont Ntringui (Massif of Mt Ntringui) with 3,813ha; Réserve communautaire de la forêt de Moya (Moya Community Forest with a surface still to be agreed upon); Réserve communautaire de l'Îlot aux Tortues (Turtle Island Community Reserve) (450ha, of which 2ha are marine); MPA Zone du Coelacanth - Baie des Dauphins (Coelacanth Zone - Dolfin Bay) covering 7,572ha of seascapes; and the Presqu'île de Bimbini - Îlot de la Selle (Bimbini Peninsula - Selle Islet) straddling 25ha of coastal areas and 3,000ha of seascapes.

<sup>2</sup> There are: Ngazidja (or Grand Comoro, 1,148 sq km), Mwali (Moheli, 290 sq km), Ndzuani (Anjouan, 424 sq km); with a total land surface of 1,862 sq km.

Project Component	Grant Type	Expected Outcomes	Expected Outputs	Trust Fund	Indicative Grant Amount (\$)	Indicative Cofinancing (\$)
		<p><i>be both more sustainably financed and more effectively managed by a capacitated national PA institution and subsidiary PA agencies on each of the islands, leading to reduced threats to globally significant habitats and species.</i></p> <p><u>Key indicators:</u></p> <ul style="list-style-type: none"> <li>- By project end: 9 new sites have been added to the national PA estate, covering at least 46,800 ha of unprotected forests and approximately 11,020 ha of seascapes.</li> <li>- Improved capacity for PA management as per average scorecard results for government and non-government PA managing entities (in brackets, baseline and target values): <ul style="list-style-type: none"> <li>Systemic capacity [from 30% to 45%]</li> <li>Institutional capacity [from 24% to 40%]</li> <li>Individual capacity [from 29% to 35%]</li> </ul> </li> <li>- Estimated annual financial gap for sustaining an expanded PA system under a basic PA management scenario is reduced by at least 30% by project end, from a baseline of \$1.7 - \$2.1 million in 2014.<sup>3</sup></li> </ul>	<p>staff at various levels and key members of communities and associations involved in PA collaborative management are capable of fulfilling their mandate</p> <p><b>1.3 PA network expansion:</b> A more representative system of PAs emerges, based on a PA system gap analysis and baseline studies, with the formulation of a 'PA System Strategy' and the legal gazettal of terrestrial PAs and MPAs</p> <p><b>1.4 PA system finance:</b> Comoros makes important and tangible advances in addressing the PA finance issue</p>			
2) Site level PA operationalisation	TA	<p><i>Increased management effectiveness for Comoros' PAs and MPAs provides improved protection to habitats in approx. 98,000 ha of protected land/seascape and to the species that they harbour, of which 41,650 ha will be directly supported by site level operationalization activities<sup>4</sup> and the remainder co-supported by the project, but mostly financed by partners:</i></p> <p><u>Key indicators:</u></p> <ul style="list-style-type: none"> <li>- Improved METT scores for the following sites from the 2013/4 baseline to a minimum target by project end (presented in parenthesis below as percentages viz. total possible scores; site numbering as per</li> </ul>	<p><b>2.1 PA management</b> is strengthened at the site level so that individual PAs become more effective 'biodiversity storehouses'</p> <p><b>2.2 Resource use governance:</b> Clarity on land tenure for terrestrial PAs and on seascape use-rights for MPAs ensure the ecological integrity of protected sites, with effective mechanisms for mediation and conflict resolution in place and</p>	GEFTF	3,183,027	14,979,605

<sup>3</sup> The lower range financial gap figure of \$1.7M reflects estimated annual gap at the baseline as per 2013/2014 financial data for an expanded PA system (i.e. with the 10 sites listed in PRODOC Table 4) and in the absence of this project, whereas the top range (\$2.1M) an extrapolated annual gap over a 5 year period, assuming no project and no change in revenues. More information on how it was calculated is contained in the SO1 Tracking Tool, Financial Scorecard. Note that this project alone is bound to inject in average some \$0.9M per year into the management of PA system. Together with leveraged funding from government and AFD in the pipeline (and which co-finance the project), new investments could cover between 2/3 and 1/2 of the gap depending on the year. This project will also implement key activities under Output 1.4 to help close the gap. The Financial Scorecard should re-applied again once the project is effective and government has assigned site level staff to the new PAs to be created (suggested in 2015).

<sup>4</sup> We here refer to Karthala; Mt Ntringui; Turtle Is.; Z. Coelacanth/B. Dauphins; Bimbini/de la Selle. Other sites, namely PMM & Moheli Rainforest and Moya CR, are receiving significant financial support from AFD and NGO Dahari respectively. The project will co-support them through technical assistance for their inclusion in the PA system and possibly critical operationalization activities to be more closely defined at project inception.

Project Component	Grant Type	Expected Outcomes	Expected Outputs	Trust Fund	Indicative Grant Amount (\$)	Indicative Cofinancing (\$)
		<p>PRODOC Table 4):</p> <p>[1] PMM: from 37% to at least 60%</p> <p>[2] Karthala*: from 38% to at least 60%</p> <p>[3] Moheli Rainf: from 13% to at least 25%</p> <p>[4] Mt Ntringui: from 8% to at least 25%</p> <p>[5] Moya Comm Res: from 10% to at least 25%</p> <p>[8] I Tortues Comm Res: from 19% to at least 30%</p> <p>[9] Z Coelac B Dauph: from 39% to at least 60%</p> <p>[10] Bimbini-I Selle: from 14% to at least 30%</p> <p>Average score for all sites: from 22% to at least 39%</p> <p>* Note: Includes also the following sites:</p> <p>[6] Hantsogoma Comm Res</p> <p>[7] Ngubadju Comm Res</p> <p>- Change in population number of indicator species and ecosystems (refer to <a href="#">Project Results Framework</a> for details):</p> <ul style="list-style-type: none"> <li>▪ Marine turtles</li> <li>▪ Coral</li> <li>▪ Mangrove</li> </ul> <p>(Note: Other possible ecological indicators may include the following, if reliable data can be obtained: seagrassbeds; presence of Livingstone fruit bat <i>Pteropus livingstonii</i> in Mwali and Ndzuani; distribution and density of selected IAS in transects)</p> <p><i>The direct and indirect benefits to local community create tangible incentives for them to support efforts to preserve the biodiversity of the Comoros:</i></p> <p>- Changes in income levels for local community households attributable to the development of biodiversity-friendly income generating activities (refer to <a href="#">Project Results Framework</a> for details)</p>	<p>operational in target PAs/MPAs (including surveys and negotiations)</p> <p><b>2.3 Tourism:</b> A realistic plan/strategy for developing sustainable eco-tourism activities in PAs/MPAs (or linked to them) is put forward and implemented</p> <p><b>2.4 Livelihoods:</b> A livelihoods programme is developed and implemented for the benefit of PA/MPA adjacent communities</p>			
		Subtotal			4,051,527	20,223,308
		Project Management Cost (PMC)		GEFTF	194,473	1,407,006
		Total Project Cost			4,246,000	21,630,314

### C. SOURCES OF CONFIRMED CO-FINANCING FOR THE PROJECT BY SOURCE AND BY NAME (\$)

Sources of Cofinancing	Name of Cofinancier	Type of Cofinancing	Cofinancing Amount (\$)
National Government	Vice Presidency, Directorate of Planning, Development & Habitat	Cash	1,000,000
National Government	MPEEIA - Ministry of Production, Environment, Energy, Industry & Craftwork, General Secretariat	Cash	300,000

<b>Sources of Cofinancing</b>	<b>Name of Cofinancier</b>	<b>Type of Cofinancing</b>	<b>Cofinancing Amount (\$)</b>
National Government	MPEEIA, General Directorate of Environment and Forests	Cash	2,000,060
National Government	MPEEIA, National Directorate of Agriculture Strategies & Livestock	Cash	2,200,000
National Government	MPEEIA, National Center for Fisheries Oversight	Cash	408,000
National Government	MPEEIA, National Directorate of Fishery Resources	Cash	820,000
National Government	Ministry of Postal Services, Telecommunications, New Technologies, Information, Transport and Tourism, Directorate of Tourism & Hospitality Industry	Cash	500,000
National Government	Ministry of the Interior and Information, Decentralization and Institutional Relations, Directorate General of Civil Security	Cash	400,000
Local Government	Ngazidja (Grand Comores) Autonomous Island: Commissariat for Production, Transport, Tourism, Infrastructural Development, and Spokesman for the Executive General Directorate for Tourism	Cash	250,000
Local Government	Ngazidja (Grand Comores) Autonomous Island: Commissariat for the Environment, Sustainable Development, Energy, Employment, Entrepreneurship and Solidarity, Regional Directorate General of Environment & Forests	Cash	500,000
Local Government	Ngazidja (Grand Comores) Autonomous Island: Djoumoichongo Steering Committee	Cash	400,000
Local Government	Ngazidja (Grand Comores) Autonomous Island: Intervention Group for Sustainable Development (public utility body)	Cash	200,000
Local Government	Moheli Autonomous Island: Commissariat for Transport, Postal Services, Telecommunications and Insularly Companies, Directorate of Tourism	Cash	250,000
Local Government	Moheli Autonomous Island: Commissariat for Rural Production, Environment, Fisheries, Handicrafts and the Diaspora, General Directorate of Environment & Forests	Cash	300,000
Local Government	Anjouan Autonomous Island: Commissariat for Local Communities and Tourism, Directorate of Tourism and Hospitality Industry	Cash	400,000
Local Government	Anjouan Autonomous Island: Commissariat for Production and Environment, General Directorate of Environment & Forest	Cash	400,000
CSO	AIDE: Association in support of Development & Environment	Cash	315,000
CSO	Anjouan: Action Comoros	Cash	300,000
CSO	Association for Protection of Gombessa-APG	Cash	500,000
CSO	Ndredou Association for Cultural Exchange and Protection of Environment, Grand Comores	Cash	300,000
CSO	NGO Ulanga Ngazidja	Cash	328,800
CSO	UMAMA Association, Bimbini Ndzuani, Anjouan	Cash	300,000
CSO	NGO Dahari	Cash	498,454
Others	Anjouan Autonomous Island: EDA – Anjouan’s Directorate for Electricity	Cash	500,000
Others	Comoros National Museum, National Library & Scientific Research Center	Cash	400,000
Others	Moheli Ecotourism House	Cash	500,000
Others	University of Comoros	Cash	2,000,000
Bilateral Aid Agency (ies)	French Development Agency (AFD)	Cash	4,110,000
Other Multilateral Agency (ies)	UNESCO - United Nations Educational, Scientific and Cultural Organization	Cash	750,000
GEF Agency	United Nations Comoros / UNDP	Cash	500,000
<b>Total</b>			<b>21,630,314</b>

**D. TRUST FUND RESOURCES (\$) REQUESTED BY AGENCY, FOCAL AREA AND COUNTRY<sup>1</sup>**

GEF AGENCY	TYPE OF TRUST FUND	FOCAL AREA*	Country name/Global	Project amount (a)	Agency Fee (b) <sup>2</sup>	Total c=a+b
UNDP	GEF TF	Biodiversity *	Comoros	1,830,000	183,000	2,013,000
UNDP	GEF TF	Land Degradation *	Comoros	616,000	61,600	677,600
UNDP	GEF TF	Climate Change *	Comoros	1,800,000	180,000	1,980,000
<b>Total GEF Resources</b>				4,246,000	424,600	4,670,600

\*Note: The Union of Comoros has requested at PIF stage the entire STAR allocation for this project by using the GEF V flexible mechanism. This was approved by Council.

**E. CONSULTANTS WORKING FOR TECHNICAL ASSISTANCE COMPONENTS:**

Component	Grant Amount (\$)	Cofinancing (\$)	Project Total (\$)
International Consultants	334,000	935,845	1,269,845
National/Local Consultants	778,050	2,063,000	2,841,050

**F. DOES THE PROJECT INCLUDE A “NON-GRANT” INSTRUMENT? No**

**PART II: PROJECT JUSTIFICATION**

**A. CHANGES IN ALIGNMENT WITH THE PROJECT DESIGN OF THE ORIGINAL PIF**

A summary of what changed since the PIF is provided below.

Original project design in PIF	Adjustment/improvement made at CEO Endorsement
<u>Allocation of GEF resources per component:</u> Comp. 1) \$1,051K Comp. 2) \$3,000K Project Management: \$195K	<u>Current allocation of GEF resources per component:</u> Comp. 1) \$8681K Comp. 2) \$3,183K Project Management: \$195K  Detailed budgeting was carried out in connection with the PRODOC development and it resulted in adjustments in the allocation of GEF resources per component. The total GEF request is unchanged; so do the project management costs. There was a slight increase in Component 2 (6%), hence there are less funds for Component 1 (reduced by \$183K). Yet, the detailed budget shows a balanced distribution between the components and that the budget available for Component 1 is sufficient for achieving the expected outcomes.
<u>Co-financing resources:</u> Indicative total: \$20.0 million Comp. 1) \$4.7 million Comp. 2) \$14.2 million Project Management: \$0.1 million	The total mobilized co-financing has increased by \$1.6 million vis-à-vis what had been foreseen at PIF stage.  Given the circumstances in Comoros, this is a tangible increase and it was the result of a more in-depth baseline analysis and the effective

Original project design in PIF	Adjustment/improvement made at CEO Endorsement
	<p>engagement of development partners during the PPG stage.</p> <p>The distribution of co-financing per component changed only slightly, with a more substantial increase in absolute terms going to Component 2 (+\$809K) and in percentage terms to Component 1 (+10%).</p> <p>It should be highlighted that the project levered interest from the University of Comoros and the National Library &amp; Scientific Research Center (under the Comoros National Museum), due to their engagement in knowledge management generation that have a bearing on conservation, including through partnerships with other tertiary and research institutions. The same applies to the parastatal EDA – Anjouan’s Directorate for Electricity and Moheli Ecotourism House, due to their interest in ecosystem services that PA can potentially generate – an agenda that these entities would like to support. Together, parastatal and academic entities provided \$3.4 million of the total co-financing.</p> <p>NGOs and CBOs provided \$2.5 million in co-financing in total, while none was expected from them at PIF stage.</p>
<p><u>Size of the target protected areas:</u> Area of new PAs whose establishment will be facilitated by the project were estimated at:</p> <ul style="list-style-type: none"> <li>- At least 36,745 ha for terrestrial sites<sup>5</sup></li> <li>- A marine area that remained to be defined, but which would likely reach 2-3,000ha</li> <li>- In total, approx. 40-41,000</li> </ul>	<p>There were various studies and consultations carried out at PPG stage, including some mapping.</p> <p>PRODOC Table 4 is similar to Table 1 that had been included in the PIF, but several numbers for site surface were updated during the PPG.</p> <p>In particular, we highlight that the size of the Moheli Rainforest that is slated to be gazetted as PA has been defined as much larger than at PIF stage (from 6,142 ha to ~ 16,170 ha), though the proposal is not yet definitive. Currently, the plans are to manage it together with PMM as a marine-terrestrial complex, given the ecological interactions between both types of environments. AFD and UNDP have been jointly co-supporting management in Moheli PAs.</p> <p>We also highlight that various sites that are slated to undergo a gazettal process have now a proposed surface, whereas at PIF stage, we indicated that this was still to be defined. These sites are: # [8] Ndroudé Islet / Ille aux Tortues (Ngazidja), # [9] Coelacanth Zone / Baie de Dauphins (Ngazidja) and # [10] Bimbini Peninsula / Ilôt de la Selle (Ndzواني).</p> <p>More specifically on site [10] Bimbini Peninsula / Ilot de la Selle, it appeared at PIF stage that it would be mostly a terrestrial site. PPG studies pointed out to the site’s vocation as mostly marine, given that the site’s biodiversity values are mostly found in beach areas and in the benthic marine environment (nesting ground for turtles, coastal vegetation, coral reefs etc.). The plan is to protect some 3,000 ha of</p>

<sup>5</sup> Note that a slightly larger area had been reported elsewhere in PIF, given the uncertainty about the future status of Bimbini Peninsula as a terrestrial PA.

Original project design in PIF	Adjustment/improvement made at CEO Endorsement
	<p>seascape around the Peninsula, plus La Selle Islet. This is also reflected in the Tracking Tools for the site.</p> <p>Finally, advancements towards defining the parameters for the PA gazettal and site operationalizing at Moya Forest as a community reserve made some progress during the PPG, but steps remain incipient. For now, no exact surface has been proposed for the site. This is also reflected in the Tracking Tools for the site. We expect the project to co-support through technical assistance the conservation agenda at Moya, where a local NGO (Dahari) has been active.</p>
<p><u>Project Strategy:</u> Outputs described with some indications on activities.</p>	<p>Through site visits, stakeholder consultation and national validation, the project strategy is now fully developed and activities described.</p> <p>Feasibility assessments were completed and with due environmental and social safeguards applied to the proposed activities. Refer to the UNDP PRODOC, Section I, Part II (Strategy) and to PRODOC Annex 2 for the results application of UNDP’s Environmental and Social Screening (ESSP).</p> <p>The project strategy is still very much in line with the original one contained in the PIF. The full development of the project strategy, including at activity and costing levels, allowed UNDP and the project proponent to explore and firm up partnerships, to mobilize co-financing and to establish a longer-term vision for how Comoros will address the PA agenda and challenges through a capacity building, collaborative and sustainability approach.</p>
<p><u>Risk Analysis:</u> Cursory analysis based on assumptions and with limited stakeholder consultation.</p>	<p>Thorough risk analysis was carried out and the corresponding management response has undergone stakeholder scrutiny.</p> <p>Also, potential risks and impacts related to the following topics have been considered through the application of the ESSP: (1) Biodiversity and Natural Resources; (2) Pollution; (3) Climate Change; (4) Social Equity and Equality; (6) Culture; (7) Health and Safety; (8) Socio-Economics; (9) Cumulative and/or Secondary Impacts. Safeguards that apply to risks and impacts flagged through the exercise, all of which relating to the first topic, were incorporated into project design. Refer to PRODOC Annex 2 for the results application of UNDP’s Environmental and Social Screening (ESSP) for more details.</p>
<p><u>Other aspects</u></p>	<ul style="list-style-type: none"> <li>• Indicators are fully developed, even though certain ecological indicators will need further scrutiny during the inception phase.</li> <li>• Management arrangements have been agreed upon during the project validation workshop held in Moroni on 08 May 2014.</li> <li>• Project consultants’ TORs have been developed</li> </ul>

### **A.1 National strategies and plans or reports and assessments under relevant conventions**

NA (No changes since PIF approval)

### **A.2. GEF focal area and/or fund(s) strategies, eligibility criteria and priorities**

The project's fit with the focal area strategy, eligibility criteria and priorities have not changed since the PIF – hence 'N/A'. For more information and details, refer to the following chapters in the PRODOC, Part II, Strategy:

- *Design Principles, Strategic Considerations and Rationale and summary of GEF Alternative*
- *Country Ownership: Country Eligibility And Country Drivenness*
- *Project Consistency with National Priorities/Plans*

### **A.3. The GEF Agency's comparative advantage**

NA (No changes since PIF approval)

### **A.4. The baseline project and the problem that it seeks to address.**

The UNDP PRODOC provides a country-specific analysis on underlying financial, economic and policy drivers that have limited the implementation of an effective and representative protected areas system in the Union of Comoros. The project justification is underpinned by technical reports, contextual analysis and application of scorecards/tracking tools.

Refer to PRODOC, Part I – Section I, Baseline Analysis, as well as other relevant sections and chapters of the PRODOC, reproduced herein.

With only 2% primary forest left and the remaining forested areas in Comoros have witnessed varied degrees of impact by human activity. As such new clearings aimed at expanding the cultivated area have reached a critical limit. There is too little forest available that can provide fertile agricultural soil through slash-and-burn land conversion. This means that agricultural intensification is an imperative, as are efforts to stem land degradation in terrestrial ecosystems. On the other hand, there is an urgent need to address direct threats to these highly threatened ecosystems by providing protection to them through a PA approach – and not just focusing on primary forest, but on a plethora of terrestrial and marine habitats that have value for conservation.

The existing framework for protected areas in the Comoros is inadequate as regards policy, and institutional and legislative aspects. The national network of protected areas must ensure the preservation of a representative sample of the value elements of the biodiversity of the Comoros while preserve ecosystem functions for the benefit of neighboring communities. Yet several initiatives to create protected areas have been undertaken in recent years but are not harmonized, are not consistent with the legislative framework and are not integrated to a rational plan designed to preserve all natural heritage of the Comoros. In fact there is no strategic plan for the establishment of a nationwide network of protected areas that meets objectives of representativity of the biodiversity of Comoros and such objectives are not defined either. The question of leadership, roles and responsibilities for the establishment and management of protected areas is not clear within the Government of the Union and between the Union and the Islands Governorates. In addition, various laws concerning the environment, forest and fisheries management assign responsibility for marine and terrestrial protected areas differently. The Comoros is in urgent need of a nation wide system to support the Government's efforts in



protecting its natural resources. This is in general the ‘point of departure’ for this project and the ‘baseline situation’ (or business-as-usual scenario) for the current intervention.

**The Baseline Project**, contributing towards the long-term solution discussed further up which underpinning the GEF investment, comprises both national investments and commitments and donor financed interventions.

**Overview of Financial baseline investments:** Currently, the budget that is directly dedicated to the management of PAs by the Directorate General for the Environment (Union and Island levels) is somewhat limited. It includes the salaries of senior staff in the Directorate, of 6-8 technical staff in the Ministry’s central office on Ngazidja, plus 2-3 staff on each of the islands. Office space is provided, but the current operational budget for the Directorate, including for the management of Moheli Marine Park, is limited to \$100-150K per annum. With the prospects of enlarging the PA estate, there is a widespread recognition that state allocations and other sources of revenue will need to gradually increase, possibly reaching a total of \$700-800K per year in the next 5 years (and starting in 2015/6). In connection with PPG studies however, various forms of government investments that relate in different ways to PA management were also assessed. As a result, a broader budgetary allocation to PAs could be consolidated as both current and in the pipeline. Those include investments and operational expenditure that co-support the management of both the existing PA and the ones being created. They also include government led activities aimed at strengthening sustainable resource use both inside and in areas surrounding PAs and at fostering tourism. All government levels are involved and the overall investment in the next 4-5 years was thereby estimated to represent some \$9.4M for the duration of the project. This amount is also the amount being committed as co-financing from the various government agencies across the Union and as shown in the table below.

**PRODOC Table 3. Government financial baseline investments**

Government entity	Description	Amount (\$ M)
MPEEIH, Direction Générale de l’Environnement et Forêts	Government Budget	2.00
MPEEIH, Direction Générale de la Pêche	Government Budget	0.82
MPEEIH, Centre National de Contrôle et Surveillance Pêche	Government Budget	0.41
Direction Régionale de l’environnement et des forêts Ngazidja	Government Budget	0.50
Direction Régionale de l’environnement Ndzuanu	Government Budget	0.40
Direction Régionale de l’environnement Mwali	Government Budget	0.30
Direction Générale du Tourisme Union	Government Budget	0.50
Direction du tourisme Ngazidja	Government Budget	0.25
Direction du tourisme Mwali	Government Budget	0.25
Direction du tourisme Ndzuanu	Government Budget	0.40
Direction generale de la sécurité Civile	Government Budget	0.40
Direction nationale de l'aménagement du territoire	Government Budget	1.00
MPEEIH, CRDE	Rural Economic Development Centers - 8 areas	2.20
<b>Total</b>	<b>All Government Baseline</b>	<b>9.43</b>

The investment from donor agencies in PA management is significant. UNDP has been managing two programme that contribute to PA management in different ways: (1) the ‘OCB Project’, or “*Capacity development and promotion of CBO volunteering as a model for involvement of village communities in achieving the MDGs in the Comoros*”; and (2) the ‘CNDD Project’ or “*Developing capacities for environmental management and multi-sectoral coordination for sustainable development in Comoros*”. Together, they

constitute a baseline of \$2.16M. The French Development Agency (AFD) is investing heavily on the on-going management of Moheli Marine Park and in its large watershed, proposed as the Moheli Rainforest PA. This is rolled out in part through the ‘AFD Djando Project’ and the ‘Moheli Project’, and in part through the past ‘ECDD project’, which was implemented in collaboration with Bristol Zoo and the Durrell Wildlife Conservation Trust—all of which are conservation oriented investments that represent some \$6 M from AFD. Renewed funding includes a \$4.5 million investment in PMM for which \$1.5M will be used to seed a conservation trust fund for Comoros protected areas although the revenue generated from this seed capital will be earmarked for PMM.

As part of the CBD’s Programme of Work on Protected Areas (PoWPA) and OCB projects, short trainings were organized for rangers, ecoguides and PA managers in anticipation of the creation of terrestrial protected areas. A 5-day tourist guide training (plus site visits) was provided to 50 people from the 19 villages surrounding the Karthala forest. Instructors were from the University of Comoros, national NGOs and institutions. Topics included historical, cultural and natural heritage, biodiversity, including some knowledge on safety and first aid. A 6-day ranger training including site visits was provided to 20 people from the 6 villages surrounding the forest of Mount Ntringui. Instructors were from the University of Comoros and the OCB project. Topics included biodiversity, ecology, landscape, traditional uses of forest species, ecotourism, regulations and basic first aid. A 2-week training in PA management was provided to 20 people from national institutions in charge of Environment, at the Union and island levels, and from the University of Comoros. Training addressed a wide range of topics including terrestrial and marine biodiversity, PA delimitation, zoning, and management, project development and management, participatory natural resource management, communication, knowledge management, sustainable development, legislation and international conventions, IUCN criteria and threatened species, ecological agriculture, pedology, environmental impact assessment, administrative and financial management, mobilization of financial resources and PA management tools such as MIRADI (Adaptive management software for conservation projects). Training included sites visits to future PAs in Ngazidja. These initiatives were very important for advancing with the protected area agenda in Comoros, but as GEF funding was involved, we do not count them against the financial baseline.

The Indian Ocean Commission (IOC) is also involved in management of forests, coastal areas and fisheries—themes that are relevant for this project. These investments by the IOC (jointly with EU and FAO) represent a baseline of approximately \$1.0M. The SmartFish program is financed by the European Union and implemented by the COI and FAO. The program seeks to promote ecotourism in order to generate alternative and sustainable livelihoods for fishing communities living in coastal areas, including on marine protected areas and conservation areas. Six fishing communities identified within APs covered by this project will receive training to be able to offer quality services and market them with hotels and agencies. An estimated \$26,600 has been directly allocated to the Comoros. Furthermore, investments in ecological research are making a contribution to the management of PAs in Comoros by generating essential knowledge and analysis for improving the PA system. These support activities are mainly financed by the EU, University of Turin and France’s Institut de recherche pour le développement (IRD). Together, they represent \$1.5M in baseline investments.

The Regional Fisheries Monitoring Project (PRSP, “Plan regional de surveillance des peches”) is a large regional project with a total of \$14.4 million of which 240,000 Euro was allocated to the Comoros. The project is in its second phase is 2013-2017. Other coastal and fisheries projects include the Coastal Resources Co-management for Sustainable Livelihood (CoReC SuD) project at an investment of \$ 2.73 million implemented by Direction National des Ressources Halieutiques, and financed in part from the Japan’s Social Development Fund (JSDF, BM, FADC). The CoReC SuD project runs from 2013 through 2017. Two additional programs associated with SWIOFP (South West Indian Ocean Fisheries Program) – one recently concluded and another in the planning stage – have provided approximately \$200,000 to Comoros for fisheries management. The new SWIOFish program is in development and will include multiple countries. The current estimated budget for Comoros is \$4 million over a 5-year period funded through the World Bank.

The EU is supporting a Climate Change Program that supports resilience to climate change that is currently in development. It is expected to provide approximately \$3 million in support from 2014-2017. A project from BID/FAO is seeking to support the intensification and diversification of agriculture in Moheli which has direct relevance towards the expansion of the Marine Park to include key terrestrial areas. The project is expected to provide \$1.5 million over 3 years.

Investments in tourism in Comoros are still incipient—and not comparable to regional “competitors” such as Reunion, Mauritius, and Seychelles. Even though it is very low at present it is increasing and has strong potential. There are flights from Nairobi and Tanzania, both tourism hubs, and from the Gulf (Dubai). The main tourist attractions in Comoros are its beaches, sports fishing and mountain scenery. Both Moheli and Karthala are picturesque tourist attractions, which may in the future generate revenue for investment in PA management. The UN has developed a program called the “Enhanced Integrated Framework” that is focused on developing tourism in the Comoros with an emphasis on ecotourism. The project budget is estimated at \$3 million from several donors and partners including UNESCO. The Enhanced Integrated Framework (EIF) of UNDP aims to integrate Comoros in regional and international trade. One program focusing on tourism "Development and promotion of responsible ecotourism in the Union of Comoros" pursues the objectives to: 1) Increase the number of visitors in protected areas and duration of their stay, and the number of jobs in tourism businesses and related sectors (accommodation, catering, tourism, agriculture and handicrafts), 2) Increase tourism revenues of village communities in and around protected areas (terrestrial and marine Mwali PA, Karthala forest, Massif du Mont Ntringui), and 3) Promote the cultural, artistic, culinary, and religious heritage. This project combined with the natural beauty of the Comoros could create the potential for the development of high-end eco-tourism products and facilities. Although currently difficult to assess and project, it is possible that private sector investment over the course of this project could represent a baseline of \$5-8M over the project’s lifetime. As this amount is speculative, it is not included in the baseline analysis.

The World Bank conducted in 2013 a review of the tourism sector in the Comoros and an analysis for a regional integration program in the Indian Ocean. The priorities identified for the development of tourism in the Comoros include the definition of a Master Plan, a favorable investment climate for a flagship project, the opening of tourism operators to market and technical networks, a clear positioning of the destination and visibility on the web.

The EU-financed SCORE project (500,000 € for Madagascar and Comoros), implemented at the University of Comoros with the support of the University of Madagascar and University of Torino, allowed training 15 Master level students from Comoros in biodiversity conservation and sustainable development, and integrating the programme in its cursus. In 2014, the programme will take place in Mwali to take advantage of the marine park for the training of 20 students. We consider approximately half of this amount as part of the financial baseline (\$0.34M).

**The total project baseline represents an investment of approximately \$22M**, of which **\$7M** can be said to contribute to PA systemic issues (the subject matter of Component 1), including correlated issues, such as knowledge management on land use, the biophysical and social environment, legal and policy reforms; and **\$15M** more directly to site-level management (the subject matter of Component 2), as well as livelihoods development and support to the tourism sector.

The project’s baseline accounts for previous and planned investments that have established—or will be established— i.e. the conditions that make the implementation of the proposed project possible. These baseline projects achieve this by addressing gaps, building knowledge and forging partnerships among stakeholders—ultimately enhancing the GEF’s catalytic role within the project. Part of this baseline funding is also being presented as co-financing to the project, in particular government funding.

However, even though baseline activities are significant, they fall short of the proposed long-term solution of constituting a functional and more sustainable system of PAs in the Union of Comoros.

**Under the business as usual scenario**, Comoros would struggle for years to complete the process of gazetting new areas. The expansion of the system would not be based on an overarching strategy to orient PA policies. While it is possible that some areas may achieve full gazetting, given that the process is rather advanced for some of them, this would not be followed by a quick or effective operationalisation of sites.

Furthermore, funding is scarce and it has proven difficult to sustain the achievements from previous PA supporting interventions. As a result, globally important ecosystems and species in Comoros would continue to be threatened. Deforestation and degradation would continue in a range of areas leading to further land-use change and loss of habitats. Overfishing and destructive fishing techniques will continue unabated in coastal areas and fish stocks for certain species may eventually collapse. The near-shore marine ecosystems would become increasingly simplified and coral communities more vulnerable. Some species with limited ranges will see their habitats more and more fragmented, leading them closer towards extinction (noting that some of them already are).

In addition to the continuing degradation of the environment, current efforts at development in and around natural habitats are not being well planned or implemented. For example, the Government had planned to build a road across Mwali through the core of the planned protected area. This would result in fragmenting the forest habitat and populations of flora and fauna in it, destroying habitats, creating an obstacle to the free movement of wildlife, and facilitating access to forest resources – almost certainly resulting in over-exploitation.

The many initiatives, both on the part of local communities and donors that aim to create protected areas and community reserves are not based on adequate legislation and overarching strategy. Part of this lack of leadership is resulting in poor infrastructure choices (e.g. corrugated sheet bungalows built beside the lake Dzilandzé, at the heart of a scenic priority area for conservation). In the absence of clear leadership and a policy, strategy or structured national plan to guide the development of the network of protected areas in the Comoros, these initiatives - however motivated by a desire to preserve and promote nature - lack coherence and could compromise the integrity of sites by inadequate facilities.

#### **A. 5. Incremental /Additional cost reasoning**

The project will seek to conserve globally significant marine and terrestrial biological diversity in the Union of Comoros by establishing an expanded and functional system of protected areas (PAs) in the country, a system that is both representative of the country's biodiversity endowment and which has good prospects for a sustainable future. The project will focus outputs and activities – over a period of six years – to achieve biodiversity conservation goals with lasting positive impacts and attuned to the country's reality:

Two components are proposed:

##### **Component 1: PA system strengthened through expansion and capacity building**

Under the first component, the project will work on four inter-related fronts: (1) improving the legal and institutional frameworks for PA management; (2) strengthening capacity for PA management at the system's level; (3) engineering the PA expansion and developing a strategy for the PA system; and (4) improving the financial sustainability of the PA system.

The key outcome to be achieved under this component is thus formulated:

**Outcome 1:** The Union of Comoros' PA system is expanded through the addition of nine (09) new sites to the estate, affording protection to varied terrestrial, coastal and marine ecosystems, and reaching a total coverage of 98,220 ha, which includes 27% of the land surface of the three islands that are object of this project and at least 47,695 ha of seascapes around them. This PA system will be both more sustainably financed and more

effectively managed by a capacitated national PA institution and subsidiary PA agencies on each of the islands, leading to reduced threats to globally significant habitats and species.

**Component 2: Site level PA operationalisation**

Under this Component, the project will work on four main fronts: (1) PA management strengthening at the site level; (2) improving resource use governance on sites and around them; (3) developing a tourism plan linked to PAs to optimize the contribution of tourism to conservation at the site level; and (4) developing and implementing a support programme for a PA-friendly livelihoods.

The key outcome to be achieved under this component is thus formulated:

**Outcome 2:** At site level, the following key results are achieved: (a) Increased management effectiveness for Comoros’ PAs and MPAs provides improved protection to habitats in approx. 98,000 ha of protected land/seascape and to the species that they harbour, of which 41,650 ha will be directly supported by site level operationalization activities and the remainder co-supported by the project, but mostly financed by partners; (b) The direct and indirect benefits to local communities create tangible incentives for them to support efforts to preserve the biodiversity of the Comoros.

**The outputs necessary to achieve both Outcomes/Components are thoroughly described in the PRODOC, Part I, Section I – Strategy, chapter Project Goal, Objective, Outcomes and Outputs/activities.**

An Incremental Cost Analysis has been carried and it is reproduced below from the PRODOC, Section II – Part II. A summary matrix is reproduced below

Cost/Benefit	Baseline (B)	Alternative (A)	Increment (A-B)
<b>BENEFITS</b>			
<b>Global benefits</b>	Under the ‘business-as-usual’ scenario, only one actively managed protected area (Moheli Marine Park) will be functioning in the entire area of the Union of the Comoros. Other areas that have been recommended for conservation or have been part of community conservation initiatives will not receive a coordinated and effective support for their establishment and operation. As a result, natural resources in the Comoros will continue to be degraded and risk the extinction of endemic and rare species and critical ecosystem services.	The project which aims to establish an expanded and functional system of protected areas (PAs) in the Union of Comoros, representative of the country’s biodiversity endowment and with good prospects for a sustainable future and increase management effectiveness for Comoros’ PAs and MPAs providing an increased protection to habitats in approx. 98,000 ha of protected land/seascape and to the species that they harbour. The direct and indirect benefits to local community will create tangible incentives for them to support efforts to preserve the biodiversity of the Comoros.	The GEF increment will contribute in an incremental manner to removing the barriers to establishing a PA/MPA system that is effectively managed and representative of Comoros’ biodiversity. This system will count on terrestrial PAs that protect unique closed and open rainforest ecosystems, montane and low-lying dry vegetation, as well as mangroves patches in all of islands that compose the Union of Comoros. At least 50,525 ha of terrestrial habitats, most of it with high conservation value, will be protected. The project will also help create MPAs that protect the critically endangered coelacanth ( <i>Latimeria chalumnae</i> ), but also beaches, which are nesting grounds to threatened marine turtles, mudflats and coral reefs that harbour important marine biodiversity typical of the Indian Ocean biodiversity hotspot. The entire expanded PA/MPA estate will extend over at some 98,000 ha of

Cost/Benefit	Baseline (B)	Alternative (A)	Increment (A-B)
			land/seascapes in Comoros. Within these areas, a number of globally important species will enjoy increased protection as a result of the project: e.g. the dugong, the Mongoose lemur ( <i>Eulemur mongoz</i> ), the Comoro black flying fox ( <i>Pteropus livingstonii</i> ) and the Comoro Rousette ( <i>Rousettus obliviosus</i> ). The designation of these areas will also include 3 Important Bird Areas and 3 Ramsar sites. The improved land/seascape management in PAs will contribute to maintain soil and water resources on the islands, increase carbon stocks, reduce GHG emissions, and protect biodiversity.
<b>National and local benefits</b>	Under the ‘business-as-usual’ scenario, framework for protected areas in the Comoros will remain inadequate as regards policy, and institutional and legislative aspects. The national network of protected areas will not be able to ensure the preservation of a representative sample of the value elements of the biodiversity of the Comoros while preserve ecosystem functions for the benefit of neighboring communities. The several initiatives to create protected areas that have been undertaken in recent years will function poorly due to a lack of a consistent legislative framework nor rational plan designed to preserve all natural heritage of the Comoros. The question of leadership, roles and responsibilities for the establishment and management of protected areas is not clear within the Government of the Union and between the Union and the Islands Governorates. The Comoros is in urgent need of a nation wide system to support the Government’s efforts in protecting its natural resources.	The project has been designed to consolidate and harmonize biodiversity conservation efforts on every level by developing systemic, institutional and individual capacities, by providing political, institutional and legal frameworks to develop, manage and ensure the sustainability of the protected areas system. This project will focus on investments in institutional creation and development – effectively establishing a Union-wide PA management authority that is able to provide a systematic technical and administrative support to the range of initiatives currently moving forward without structure or adequate technological or financial capacity. As well, the lack of examples of effective management and co-management of protected areas in Comoros limits the ability of stakeholders to develop the skills and the experience necessary to effectively manage protected areas.	The goal of the project is to establish in Comoros an effectively managed PA system, composed of both PAs and MPAs, a system that is representative of the country’s biodiversity and that provides a much more significant coverage to unprotected ecosystems and safehaven to threatened species. The sustainability of this system also needs to be secured. The Baseline project, contributing towards this long-term solution and underpinning the GEF investment, comprises both national investments and commitments and donor financed interventions.

## A.6. Risks

A more thorough risk analysis than that of the PIF has been carried out and is contained in the PRODOC, Section I, Part II – Project Risks. The risk matrix is reproduced below.

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<u>FINANCIAL</u> The absence of reliable	High	Very likely	<b>H</b>	UNDP recognizes that approaching the goal of financial sustainability at the PA system level is important, but that takes this time, and that the

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p>financial flows to the PA system undermines the effectiveness of PA management beyond the duration of the project intervention</p>				<p>approach should preferably have a systemic focus, rather than focusing excessively on a single site. All of the best practices on PA finance point out to a multi-modal approach. It is not sufficient to focus only on a trust fund or on government investments in the PA system. One needs to focus both on the cost and on the revenue side of the PA finance equation. With respect to costs, the project's approach is to involve communities in various aspects of site management. This should help offset the costs of enforcing rules on resource use governance and decrease the average costs of site management. There will also be a concerted approach to mobilizing resources from various sources, including by expanding the donor and partner base that co-support the PA system, and by involving the private sector, where there is scope for it. The setup of the project core team, with a senior Chief Technical Advisor specialist in conservation and PA management, will help create the conditions to make this happen. Altogether, the project will establish an enabling framework for the government, donors, NGOs and the private sector to invest according to a focused and coherent plan to maintain a financial flow that will ensure the viability of the PA system beyond the lifetime of the project (Output 1.4). Besides, the project budget is geared towards sustaining the bulk of the costs of the PA system in the next 4-5 years. After that, it is expected that other financial mechanisms will be in place to sustain, if not all, then the bulk of recurring costs of PA management. These will include other financial mechanisms including increased government operating budgets and a conservation trust fund established through baseline investments. The analysis of PA financing needs carried out at PPG stage has shown that this is feasible. Without reliable revenue streams to PAs, the risk to the sustainability of conservation results would be high. Yet, through the multimodal and system-wide approach to addressing financial sustainability and management capacity deficits, and in combination with baseline investments contributing to sustainability, this risk is mitigated.</p>
<p><b><u>POLITICAL</u></b> Land tenure insecurity (due to the superposition of civil, religious and traditional laws) in areas designated for the creation of protected areas may become a barrier to the actual establishment and operationalisation of these</p>	High	Likely	<b>H</b>	<p>Tackling the land tenure problem at the level of regulations may require solutions at systemic level that go beyond what the project is designed to impact on. However, a project output (2.2) is designed to bring clarity on land tenure issues with respect to terrestrial PAs and to introduce effective mechanisms for mediation and conflict resolution in target PAs, including negotiations leading to the establishment of formal long-term user right agreements with clear specifications. The project</p>

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
areas and for the adoption of new, sustainable practices.				will equally invest in the participation of all relevant stakeholders in the discussion PA gazettal decrees and in the development and implementation of agreements for the collaborative management of natural resources. Furthermore, the project will support the implementation of the forestry law, which provides some useful guidelines on land-use and tenure. All the relevant safeguards for ensuring that consultations with affected stakeholder take place before any decisions on change of land-use and no involuntary resettlement of resident populations will takes place in the realm of the project will be apply.
<p><u>INSTITUTIONAL</u></p> <p>Institutional capacities are inadequate to manage the protected area system, especially after the expansion of the estate. Constraints of hiring in the public service do not allow the hiring of the staff required to the institutional development envisaged in the project.</p>	High	Likely	<b>H</b>	The project provides for the development of national capacities in the management of protected areas, including the emergence of a more effective PA management institution. This will also involve the development of skills of its staff, of PA site managers, relevant ministries and agencies, local governments of riparian communes, local CSOs representative of riparian communities, and (if applicable) concerned tourism operators. All these partners will provide a network of trained actors able to participate in the process of co-management of protected areas advocated in the Comoros. Furthermore, the project will engage in an institutional restructuring process in order to boost national capacity. (Outputs 1.1 and 1.2) This risk could become critical if the project does not have a successful start up by year 2 with the bulk of procurement and recruitments concluded and a solid plan for implementing the strategy. International assistance will be brought to bear to ensure that this is the project has a successful upstart.
<p><u>FINANCIAL</u></p> <p>Government and local authorities and producers give priority to short term gains over the long term intangible benefits of conservation when faced with rare economic opportunities (such as the increased demand for ylang-ylang essential oil on international markets) and invest heavily in the exploitation of resources without applying the requirements of sustainable development, and create undue pressure on land and water resources and</p>	High	Likely	<b>H</b>	The project will establish a dedicated entity to manage the PAs system which shall, among other things, see to the compliance with laws and regulations concerning the PAs and the use of resources to ensure the integrity of species and their habitats (Output 1.1). The project will support the implementation of a strategic communication plan (act.1.2.3) and the development of a website (act. 1.2.1) to raise awareness among resource users and the general public on the importance and value of biodiversity and ecosystem services for the well-being of the population and give access to information on PAs and their issues to foster national ownership of the PAs system. As part of the implementation of PA management plans (act. 2.1.4), the project will support the reforestation of the perimeter of plots located on the periphery of natural forests within PAs to improve their yield to meet growing demand for fuel wood, fodder and



IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
remaining natural forests.				food and prevent the clearing of new plots at the expense of the forest.
<u>ENVIRONMENTAL</u> Climate and natural disaster risks: Due to its geographical situation, fragile soils and volcanic activity (for Ngazidja), Comoros is prone to experience cyclones, heavy rains, landslides, habitat disruption and floods. In Ngazidja, this risk is exacerbated when rain does not seep into soils clogged by volcanic ashes.	High	Moderately likely	M	This risk will be mitigated by the conservation of remaining forests in PAs and reforestation and adoption of SLM practices in most vulnerable watersheds (with steep slopes).(Output 2.1) Climate change is slow acting risk, which is being monitored in Comoros, including with the assistance of other GEF projects.
<u>OTHER</u> Gas development, including ongoing seismic exploration surveys pose varying degrees of threat to cetaceans, marine turtles and fish; and potential exploration and appraisal surveys involving drilling operations, increase risks of spills and pollution to the marine and coastal habitats	High	Moderately likely	M	The risk of collision for cetaceans and sea turtles is relatively limited since the speed of the ship during seismic operations is normally constant and moderate. However, in order to mitigate the impact of seismic waves on cetaceans, turtles and fish, MPA management plans (especially for the Moheli Marine Park and Coelacanth zone MPA) will include provisions to mitigate such impacts by identifying sensitive periods for cetaceans and turtles during which seismic operations must be suspended in the vicinity of the MPA. As part of the activities on the legislative framework (output 1.1), the project provides for the harmonization of texts on issues that may have an impact on PAs and their resources. The project will examine the possibility of incorporating provisions to anticipate and reduce risks at all stages of intervention in exploration, infrastructure installation and operation agreements and that they are required by the Petroleum Code (2013) and related regulations. Provisions regarding seismic operations may include the use of avoidance corridors or compliance with time windows to reduce the risk of affecting cetacean populations and adoption of a procedure requiring visual monitoring and stopping all movement when a whale is seen in a given radius from the source of seismic waves.
<u>STRATEGIC</u> The socio-economic context is unstable and not conducive to the emergence of environmental awareness within the population that is not willing to change their behaviour and unsustainable use of natural resources.	Medium	Likely	M	The project will raise the awareness of local communities on the benefits associated with the conservation of biodiversity and ecosystem services through environmental education, demonstration of new practices and associated benefits. It will support the development of a livelihoods programmed linked to PA management (Output 2.4) and ecotourism for the benefit of these communities (Output 2.3).

IDENTIFIED RISKS AND CATEGORY	IMPACT	LIKELIHOOD	RISK ASSESSMENT	MITIGATION MEASURES
<p><b><u>POLITICAL</u></b> The structures established for the management of protected areas are not supported by the authorities who constrain their autonomy of management. Village representatives in the co-management committees are not playing their role in a transparent manner which hampers the effective participation of communities in decisions relating to the management of the protected area and may lead them to withdraw their support to the PA conservation objectives.</p>	Medium	Moderately likely	L	<p>The project provides for capacity development and awareness of village communities on the role assigned to them in co-managing a protected area and the benefits provided by ecosystem services in and around effectively managed protected areas (Output 1.2).</p> <p>The project will also support the introduction of transparent mechanisms for the election of village representatives and for community and resource users' consultation in the context of PAs and land resources management in the surrounding ecosystems.</p> <p>Furthermore, effective mechanisms for mediation and conflict resolution will be put in place and made operational (Output 2.2). These allow villagers a voice and PA managers recourse options for dealing with tensions arising from resource and land use change arising from the establishment of PAs and MPAs.</p>
<p><b><u>ENVIRONMENTAL</u></b> Marine and terrestrial ecosystems are not sufficiently resilient and their biological and physical integrity is incrementally compromised by the effects of global and regional climate change</p>	Low	Moderately Likely	L	<p>The design and management of the expanded system of PAs/MPAs will seek to have control of the major pressures on biodiversity and harmonize the management of key biodiversity resources within PAs with that of surrounding ecosystems in order to reduce the negative impacts of activities taking place outside PAs. The PMM will be expanded to include its watershed and Mwali's rainforest in order to have control of activities leading to pollution, erosion and sedimentation affecting the coral reefs and seagrass meadows in the coastal area, while conserving terrestrial biodiversity. Improving health condition of seagrass, coral reef and associated biodiversity by reducing pressures will enhance its resilience to stresses caused by climate change such as climate-induced bleaching.</p>

#### A.7. Coordination with other relevant GEF financed initiatives

Refer to PRODOC, Section IV –PART III: Stakeholder Involvement Plan and Coordination with other Related Initiatives, Chapter Coordination with other related initiatives, reproduced below.

The project will closely coordinate with on-going UNDP financed interventions which are part of the Country Programme, namely the program focusing on tourism "Development and promotion of responsible ecotourism in the Union of Comoros" of the Enhanced Integrated Framework (EIF) which aims to integrate Comoros in regional and international trade. This program's objectives converge with those of outputs 2.3 and 2.4 of the current project: 1) Increase the number of visitors in protected areas and duration of their stay, and the number of jobs in tourism businesses and related sectors (accommodation, catering, tourism, agriculture and handicrafts), 2) Increase tourism revenues of village communities in and around protected areas (terrestrial and

marine Mwali PA, Karthala forest, Massif du Mont Ntringui), and 3) Promote the cultural, artistic, culinary, and religious heritage. The project will also coordinate its action with GEF projects, in particular those implemented by UNDP and the relevant SGP ones – e.g. on NRM related themes, e.g. APG’s work on the establishment of the Coelacanth zone, and surveys conducted around the Turtle Island. Close coordination and collaboration will be sought with the UNDP-GEF/LDCF projects “*Adapting water resource management in the Comoros to expected climate change*” (on-going) and “*Enhancing adaptive capacity and resilience to climate change in the agriculture sector in Comoros*”. These are particularly important to the extent that they relate to land-uses (agriculture) and ecosystem services (water yields). Where sites coincide, synergies will be further developed.

Close coordination and collaboration will be sought with initiatives financed by AFD that are co-financiers to this project. The development of the project’s activities during the PPG were done in full consultation with these partners. AFD has an office in Comoros and is financing: (i) the Djando project on reforestation and protection of waterways on Mwali Island; and (ii) a project for operationalising the Moheli Marine Park, where work is just initiating on strengthening the governance system for collaborative management of the PA and reconciling conservation of natural resources with the development of economic and income generation activities. This will be particularly relevant for Component 2 activities of this project. This project is also developing a Conservation Trust Fund (CTF) for long term financing of the PMM which will be integrated in the financing mechanism developed in Component 1 of this project to coordinate and implement long-term financing solutions for the PAs of Comoros. AFD and UNDP have agreed to harmonize interventions in Mwali Island, merge project teams and work plans and set up one common PSC for both projects.

The project will coordinate with the EU-funded SmartFish Programme implemented jointly by IOC and FAO which aims to support the promotion of ecotourism in order to generate alternative and sustainable livelihoods for fishing communities living in coastal areas, including on marine protected areas and conservation areas. Six fishing communities identified within PAs covered by this project will receive training to be able to offer quality services and market them with hotels and agencies which will be particularly relevant to outputs 2.3 and 2.4.

Discussions with IFAD seeked to harmonize their interventions as part of the National Program for Sustainable Human Development and the on-going GEF-IFAD BD LD MSP (*Integrated Ecological Planning and SLM in Coastal Ecosystems in the Comoros*). Although the MSP design had foreseen the legal declaration of new PAs, including in Bimbini, it was agreed to support the development of locally-managed marine areas for the collective management of marine and coastal resources of the lagoon surrounding the peninsula. These interventions will not in any way duplicate what is being proposed under this project, but rather complement it by developing a sustainable management system of fish resources consistent with the collaborative management approach and support diversification of livelihoods for coastal communities. This present project will build on the achievements of the IFAD project with respect to protected areas and community-based sustainable management of marine resources.

Another key co-financier is the Indian Ocean Commission, which is investing in sustainable management of coastal areas with EC funding and through a regional initiative. This project also will draw on scientific production that has a direct application to conservation, which includes some of the work being financed by the EC and the University of Turin as briefly described in the ‘baseline investment analysis’ for this project. Finally, coordination and collaboration between this project and other interventions will include related initiatives by e.g. FAO (on forests and fisheries), but equally on the fight against IAS and climate change, to the extent that they relate to project activities.

## **B. ADDITIONAL INFORMATION NOT ADDRESSED AT PIF STAGE**

### **B.1 Stakeholder engagement in project implementation**

A thorough stakeholder engagement plan is contained in the PRODOC.

Refer to PRODOC, Section IV –PART III: Stakeholder Involvement Plan and Coordination with other Related Initiatives, Chapter Stakeholder involvement plan, reproduced below.

The project's design incorporates activities and mechanisms to ensure on-going and effective stakeholder participation in project implementation:

- Project inception workshop to enable stakeholder awareness of the start of project implementation: The project will be launched by a multi-stakeholder workshop. This workshop will provide an opportunity to provide all stakeholders with the most updated information on the project and the project work plan. It will also establish a basis for further consultation as the project's implementation commences.
- Project Steering Committee to ensure representation of stakeholders interests in project: A Project Steering Committee (PSC) will be constituted to ensure broad representation of all key interests throughout the project's implementation. The representation, and broad terms of reference, of the PSC are further described in [Section I, Part III](#) (Management Arrangements) of the Project Document.
- Project communications to facilitate on-going awareness of project: The project will develop, implement and maintain a communications strategy to ensure that all stakeholders are informed on an on-going basis about the project's objectives and activities; overall project progress; and the opportunities for involvement in various aspects of the project's implementation.
- Establishing collaborative governance structures to formalise stakeholder involvement in PA management: The project will actively seek to formalise collaborative governance structures, i.e. collaborative management committees, at the seven protected areas supported by the project in order to ensure the continuous participation of government at the Union, Island and commune levels, local authorities, scientific institutions, and private stakeholders in the project and in the management of the PA system.
- Capacity building: Project activities are focused on building the capacity – at the systemic, institutional and individual levels – of the institutions, local community organisations and other stakeholders to ensure the sustainability of initial project investments. Significant GEF resources are directed at building the capacities of MPEEIH at the institutional level to lead ecosystem-level information management and planning for conservation and development, and of the new institution dedicated to the PA system to enable more effective PA management at the Union and site levels.

## **B.2 Socio-economic benefits at the national and local levels, including gender dimensions considerations**

Refer to PRODOC, Section II, Part II, Incremental Cost Analysis, where socio-economic benefits have been described.

This project will bring significant benefits at the national and local levels. The benefits to local communities brought by improved conservation of ecosystems and biodiversity in their environment include food and water provision security, the retention of arable land, secure access to safe, clean and sanitary public recreation areas, opportunities for livelihood diversification through increased tourism, and maintenance of coastal ecosystems, i.e. reefs and mangroves, which contribute to protecting the shoreline in the event of a natural disaster. The management rules for protected areas will allow the local communities, who bear the opportunity costs related to the adoption of sustainable practices and who share management responsibilities, to benefit from some exclusive resource use rights (besides benefiting from ecosystem services which may be less tangible in the short term). This should give them adequate incentives to participate in the conservation / sustainable use of the natural resources and in their surveillance. Fishermen will benefit from the protection of fish critical habitats, from a better management of the fish populations that sustain the fisheries, and from an identification of fishing areas for their exclusive use, thus reducing potential social tensions. The project will produce significant gains

on co-management of near shore fisheries resulting in an increase of revenues for the many local communities who depend at least partially on them. Although there are some baseline projects focused on the fisheries sector, this project provides the opportunity to combine MPA approaches (core no take zones) with strong community collaboration on multiple use zones to provide concrete examples of successful fisheries management as a model for other areas of the country.

Tourism entrepreneurs will benefit from the protection of assets, i.e. landscapes and resources, which they operate. Although tourism continues to be very limited in the Comoros, there is a wealth of attractive destinations and several projects in the baseline and co-financing of the project seek to significantly increase the quality of services and approaches to tourism (especially ecotourism) in the country. The project will significantly increase the options for the tourism sector as a key partner and contributor to the emergent PA system. The tourism sector's growth will depend on an effective and well maintained PA estate. The electric companies in both Moheli and Anjouan benefit from improved management of the watersheds feeding into several hydroelectric dams. The project will partner with these companies to ensure effective collaboration and develop PES models.

At the national level, indirect use benefits brought by an improved conservation of ecosystems and species will include stabilisation of ecosystem services and climate, mitigation of natural disasters including floods, carbon sequestration (though not necessarily marketable carbon) and soil nutrient retention. Beyond biodiversity values, the non-use benefits of a well-developed PA system will contribute to the preservation of the Comorian community values, of Comorian unique landscapes and of associated cultural heritage.

**Gender dimension.** In the Comorian society, of Islamic religion, women have an unusually privileged place since they inherit of all the family land on Grand Comoro and part of the land in the other two islands, and they own the houses. In addition, women are more likely to obtain a micro-credit than men, thanks to their tradition of savings and better reimbursement rates. However, women face many difficulties in employment: only 43% of women work, often in more precarious jobs, their share of the wage is much lower and most of their jobs are in agriculture, on family plots. The project will ensure that its objectives and activities are specifically promoted to women and that they perceive clearly their own benefits to participate. The project will involve women in all capacity building activities and strengthen their role in the community's development. Project activities will take into account women's specific capacities and tasks and aim to alleviate the burden of their chores. The project will adopt gender specific indicators to monitor women's participation in all activities as well as their perception of the project's impact on their daily lives.

UNDP carried out due diligence prior to clearance of the PRODOC and screened the project for potential social and environmental negative effects.

Refer to PRODOC Annex 3 for the [UNDP Environmental and Social Screening](#) applied in May 2014.

### **B.3. Cost-effectiveness reflected in project design**

The cost effectiveness analysis has been further developed since the PIF. Cost-effectiveness is enshrined in the project strategy and its choices.

Refer to PRODOC, Section I, Part II – [Cost Effectiveness Analysis](#), which is reproduced herein.

The project is designed to create an effective PA system in a short period of time with targeted investment building directly on previous and ongoing efforts. There are several aspects to the project that have been designed for cost effectiveness. These include 1) the focus on protected areas as a solution for biodiversity and critical ecosystem services conservation, 2) the creation of a Union-wide protected areas authority, and 3) the focus on specific target PAs for capacity building and management support.

The focus on PA management as a solution for biodiversity and ecosystem services conservation is cost effective in comparison to other approaches to sustainable land and resources management because Comoros has only one existing PA and there are many sites that are under threat from habitat conversion and overexploitation. The PA approach offers very targeted management solutions that conserve key resources while providing a focus for community interaction and efforts on improved NR management in and around the new PAs. Protected areas in general are considered cost efficient with regard to conservation measures and can provide 25 times return on investment according to the TEEB reports.

The creation of a Union-wide PA authority is one of the proposals made in this project to deal with current inefficiencies in PA management. All relevant argument pro and con such proposal will be duly analysed. Yet, we note that there are two alternative approaches that have been considered and found to be less cost effective. First, there is the possibility of working through the existing environmental management departments of the Union government and the island governments. This is considered less cost effective because the gains that will be achieved during the implementation phase of the project will eventually be lost once the project is completed as there will be little institutional memory to maintain gains and capacity. Although the existing environmental staff of these government departments are committed advocates of biodiversity conservation, they are engaged in a wide variety of environmental management issues and are not adequately focused on PA management issues for a cost effective project implementation and continuation. The second alternative would be the establishment of PA management entities in each of the three islands. This would not be cost effective due to the fact that certain technical positions would need to be hired at each of the islands and, not only is this capacity difficult to find, but also this would be a more expensive approach than hiring specialists at the Union level and allowing them to move around to the islands to provide support to local teams. There are other cost savings that can be made from centralizing a larger organisation than having to repeat structures at each level (administration, management, etc.).

Finally, the focus on specific target PAs for implementation of capacity building and proving effective models allows the project to focus on specific high value areas that are both the most important in terms of biodiversity and those areas where past work would contribute to the success of project implementation. These target sites would then become models for the remaining areas of Comoros in need of conservation efforts through PA creation and management.

At the same time, the project will seek to utilize the existing resources and capacities of local NGOs and community groups that have shown effectiveness in their actions to date.

### C. BUDGETED M & E PLAN

The project's M&E Plan is thoroughly described in the UNDP PRODOC. For more detail, refer to Section I, PART IV: Monitoring and Evaluation Plan and Budget. The table below provides a summary.

Type of M&E activity	Responsible Parties	Budget US\$ <i>Excluding project team staff time</i>	Time frame
Inception Workshop and Report	<ul style="list-style-type: none"> <li>▪ Project Coordinator</li> <li>▪ UNDP CO, UNDP GEF</li> </ul>	Indicative cost: 20,000	Within first two months of project start up
Measurement of Means of Verification of project results.	<ul style="list-style-type: none"> <li>▪ UNDP GEF RTA/Project Coordinator will oversee the hiring of specific studies and institutions, and delegate responsibilities to relevant team members.</li> </ul>	To be finalized in Inception Phase and Workshop.	Start, mid and end of project (during evaluation cycle) and annually when required.
Measurement of Means of Verification for Project Progress on <i>output and implementation</i>	<ul style="list-style-type: none"> <li>▪ Oversight by Project Coordinator</li> <li>▪ Project team</li> </ul>	To be determined as part of the Annual Work Plan's preparation.	Annually prior to ARR/PIR and to the definition of annual work plans

Type of M&E activity	Responsible Parties	Budget US\$ <i>Excluding project team staff time</i>	Time frame
ARR/PIR	<ul style="list-style-type: none"> <li>▪ Project Coordinator and team</li> <li>▪ UNDP CO</li> <li>▪ UNDP RTA</li> <li>▪ UNDP GEF</li> </ul>	None	Annually
Periodic status/ progress reports and lessons learned	<ul style="list-style-type: none"> <li>▪ Project Coordinator and team</li> </ul>	None	Quarterly
Mid-term Evaluation	<ul style="list-style-type: none"> <li>▪ Project Coordinator and team</li> <li>▪ UNDP CO</li> <li>▪ UNDP RCU</li> <li>▪ External Consultant (i.e. evaluation team)</li> </ul>	Indicative cost: 42,000	At the mid-point of project implementation.
Final Evaluation	<ul style="list-style-type: none"> <li>▪ Project Coordinator and team,</li> <li>▪ UNDP CO</li> <li>▪ UNDP RCU</li> <li>▪ External Consultant (i.e. evaluation team)</li> </ul>	Indicative cost: 42,000	At least three months before the end of project implementation
Project Terminal Report	<ul style="list-style-type: none"> <li>▪ Project Coordinator and team</li> <li>▪ UNDP CO</li> <li>▪ Local consultant</li> </ul>	None	At least three months before the end of the project
Audit	<ul style="list-style-type: none"> <li>▪ UNDP CO</li> <li>▪ Project Coordinator and team</li> </ul>	Indicative cost: 18,000	Yearly
Visits to field sites	<ul style="list-style-type: none"> <li>▪ UNDP CO</li> <li>▪ UNDP RCU (as appropriate)</li> <li>▪ Government representatives</li> </ul>	For GEF supported projects, paid from IA fees and operational budget	Yearly
Inception Workshop and Report	<ul style="list-style-type: none"> <li>▪ Project Coordinator</li> <li>▪ UNDP CO, UNDP GEF</li> </ul>	Indicative cost: 20,000	Within first two months of project start up
Measurement of Means of Verification of project results.	<ul style="list-style-type: none"> <li>▪ UNDP GEF RTA/Project Coordinator will oversee the hiring of specific studies and institutions, and delegate responsibilities to relevant team members.</li> </ul>	To be finalized in Inception Phase and Workshop.	Start, mid and end of project (during evaluation cycle) and annually when required.
Measurement of Means of Verification for Project Progress on <i>output and implementation</i>	<ul style="list-style-type: none"> <li>▪ Oversight by Project Coordinator</li> <li>▪ Project team</li> </ul>	To be determined as part of the Annual Work Plan's preparation.	Annually prior to ARR/PIR and to the definition of annual work plans
ARR/PIR	<ul style="list-style-type: none"> <li>▪ Project Coordinator and team</li> <li>▪ UNDP CO</li> <li>▪ UNDP RTA</li> <li>▪ UNDP EEG</li> </ul>	None	Annually
Periodic status/ progress reports and lessons learned	<ul style="list-style-type: none"> <li>▪ Project Coordinator and team</li> </ul>	None	Quarterly
TOTAL indicative COST <i>Excluding project team staff time and UNDP staff and travel expenses</i>		US\$ 126,000	


**PART III: APPROVAL/ENDORSEMENT BY GEF OPERATIONAL FOCAL POINT(S) AND GEF AGENCY(IES)**

**A. RECORD OF ENDORSEMENT OF GEF OPERATIONAL FOCAL POINT(S) ON BEHALF OF THE GOVERNMENT(S)**

NAME	POSITION	MINISTRY	DATE (MM/dd/yyyy)
Ali Mohamed Solihi	Permanent Secretary	Vice-Presidency in charge of the Environment	August 1, 2012

**B. GEF AGENCY(IES) CERTIFICATION**

This request has been prepared in accordance with GEF/LDCF/SCCF/NPIF policies and procedures and meets the GEF/LDCF/SCCF/NPIF criteria for CEO endorsement/approval of project.

Agency Coordinator	Signature	Date (Month, day, year)	Project Contact Person	Telephone	Email Address
Adriana Dinu, UNDP-GEF Executive Coordinator and Director a.i.		August 12, 2014	Fabiana Issler Regional Technical Advisor, Ecosystems & Biodiversity, Africa, UNDP-GEF	+251-911-43- 2003	<a href="mailto:fabiana.issler@undp.org">fabiana.issler@undp.org</a>



## **ANNEX A: PROJECT RESULTS FRAMEWORK**

Refer to specific sections and pages in the PRODOC for a reference:

### **SECTION II: Strategic Results Framework (SRF) and GEF Increment**

pages 78-85

#### **PART I: Strategic Results Framework Analysis:**

Programmatic Links

Indicator Framework as part of the SRF

Project Outputs

**ANNEX B: RESPONSES TO PROJECT REVIEWS**

#	Comments	Responses	Document reference
<i>US Comments from November 28, 2012</i>			
1	<p>The United States recognizes the importance of conserving the exceptional marine and terrestrial biodiversity of the Comoros Islands and the outstanding potential that the Comoros Islands have to become a first class eco-tourism destination. Consequently, the United States supports efforts to protect the country’s unique natural heritage. That said, we do have concerns about the very ambitious scope of this project, both in terms of the financial scale of the project relative to the Comoros GDP, the current viability of tourism, as well as the capacity of the GOC to implement this ambitious project:</p>		
2	<p>Specifically, we would like to know what steps have been taken by the project implementers to assure that a supportive business environment is in place to ensure that the “plan/strategy for developing high-end eco-tourism activities in PAs/MPAs” outlined in Output 2.3, is in fact realistic.</p>	<p>Several ongoing initiatives are supporting the Government’s efforts at developing tourism in the Comoros – and especially ecotourism or nature-based tourism linked to the PA network. These include UNDP’s project "Development and promotion of responsible ecotourism in the Union of Comoros" (\$3 million from several donors and partners and is part of the Enhanced Integrated Framework – the EIF), EU-funded SmartFish Programme to support the promotion of ecotourism, and the definition of a Master Plan for tourism development in the Comoros supported by the World Bank. The Output 2.3, and especially the elaboration of the plan/strategy for developing sustainable eco-tourism activities across the PA network, will be implemented in close coordination with ongoing initiatives implemented under these projects or following them.</p> <p>As part of the project strategy, the analysis emanating from these various initiatives will instruct a series of strategic decisions that will form the backbone of the strategic plan for the development of tourism linked to PAs, as follows:</p> <ul style="list-style-type: none"> <li>• To define the orientations of development of tourism in relation to the PAs (e.g. promote fair and responsible tourism, luxury, backpack or intermediary, seaside, cultural, nature or combination; target in priority national, regional or international markets, etc.);</li> <li>• To guide the choice of alternatives, optimize the design of value chains</li> </ul>	<p>PRODOC, Description of Output 2.3</p> <p>Refer also to PRODOC, Section I, Part I, Chapter Baseline Analysis for more information on related initiatives and to Section IV, Part II for an overview of how the project will work with them.</p>

#	Comments	Responses	Document reference
		<p>to support or develop, optimize the choice of technologies and implementation of projects (e.g. greening of existing or new infrastructure to reduce economic and environmental costs);</p> <ul style="list-style-type: none"> <li>• To guide decisions in terms of operationalization, development and infrastructure to set up, to optimize their benefits and mitigate their potentially harmful effects.</li> </ul> <p>The analysis will allow integrating environmental considerations early in the process of decision making related to the identification of future ecotourism investments and their implementation. Constraints will be identified, especially in terms of capacity, to provide a tourist experience that is profitable for village communities, high quality for customers, and safe for the natural and cultural heritage. These capacity needs will be integrated in the capacity development plan. Moreover, the participatory approach, involving all relevant stakeholders in decision-making, will contribute to better governance and ownership of tourism development.</p> <p>This analysis will be achieved by identifying key issues through a matrix of interactions between the major aspects of the development and operation of ecotourism projects/activities, and the different variables of the physical, biological and human environment. Aspects of the human environment and socio-economic issues will be addressed separately for men and women and, where useful, for youth. The aspects of the development and operation of ecotourism related to PAs may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• construction or renovation of buildings (location, visual impact on landscape, choice of materials, design reflecting the local culture and environment)</li> <li>• setting up recreational facilities</li> <li>• transportation infrastructure (roads, trails, mooring buoys, landing platforms, etc.)</li> <li>• visitors' behaviour when visiting wildlife habitats in terrestrial and marine environments</li> <li>• water and energy provisioning and management</li> <li>• waste management</li> </ul>	

#	Comments	Responses	Document reference
		<ul style="list-style-type: none"> <li>• risk management and public safety</li> <li>• social and economic impact on local communities.</li> </ul> <p>As much as possible, the environment of intervention areas will be documented by exploiting the existing knowledge, documents and databases, and complemented with site surveys to address key knowledge gaps. Studies on the impacts of tourism development in the island countries in the region will be used to leverage existing knowledge from analyzes already conducted in the assessment of potential impacts of different forms of tourism in countries experiencing somewhat similar context, opportunities and constraints. The identification of best practices will draw on existing documents for several aspects of tourism development, infrastructures and activities.</p> <p>Concessioning is also a promising modality to explore, though not yet tried in Comoros. At least one of the CBOs that is currently managing a community reserve in the process of being created has expressed an interest in concessioning out eco-tourism lodging facilities, recognising that their capacity to manage such establishments is limited. The project will encourage this attitude in other sites where applicable.</p> <p>We do recognise, however, that any tourism development in Comoros will depended on the government addressing some of the transport and infrastructure constraints on it. This is quite separate from the project and it is happening on its own pace as the country makes advances in its development agenda.</p> <p>At the same time, the more promising segment of the tourism in Comoros is currently the ‘adventure’ type ecotourism, for which infrastructure needed is minimal.</p>	
3	Furthermore, while we recognize the potential synergy between new protected areas and increased tourism in the Comoros, as the PIF notes, the Comoros	Although investments in tourism in Comoros are still incipient—and not comparable to regional “competitors” such as Reunion, Mauritius, and Seychelles, the ‘adventure eco-tourism’ segment is increasing and has strong potential. Other segments could follow. There are direct flights from Nairobi	PRODOC, description of Output 1.4. and Output 2.3

#	Comments	Responses	Document reference
	<p>face significant challenges in fostering a viable tourism industry. We would like to know how the project implementers envision the growth of this industry given the current limitations of tourism-related infrastructure and lack of business incentives to expand it, as well as the relative lack of safe air or sea inter-island transportation options.</p>	<p>and Tanzania, both tourism hubs, and from the Dubai.</p> <p>We stress however that the project’s sustainability and success does not depend upon significant number of tourists arriving in Comoros. There is one output focusing on tourism and it is a pilot, where the projet’s role is feasibility assessment, facilitation and awereness raising. If succssful, the development of conservation compatible tourism, preferably high-end, will result in a gradual increase of visitors, some of which may have an interest in the PAs and would be willing to pay a conservation fee or other levies that may revert to conservetion. In due course, as infrastructure and business incentives are improved, these will complement other sources of long term financing for the PAs alongside with the Conservation Trust Fund and government financing.</p>	
<b><i>Germany’s Comments from November 29, 2012</i></b>			
4	<p>Germany agrees with the STAP in that the PIF is well presented, clear, logically framed and achievable, and that the baseline is well defined and described, including citation of key scientific results and the description of existing barriers to realization of project objectives and steps to remove these.</p>		
5	<p>The new protected areas (PAs) to be established seem to fall under two distinct governance types: co-managed national PAs (shared governance) and community reserves (governance by local communities) (see current IUCN Guidelines for Applying Protected Area Management Categories, <a href="http://data.iucn.org/dbtw-wpd/edocs/paps-016.pdf">http://data.iucn.org/dbtw-wpd/edocs/paps-016.pdf</a>). Under Component 1, the revision of the legal framework and institutional structures should therefore take into account these two possible types of governance (and others, if applicable).</p>	<p>The possibility of establishing community reserves or voluntary conservation areas will be included among the categories of PAs to be proposed in new legislation, insofar as they correspond to the wishes and initiatives of local communities and are consistent with the definition of the WCPA (IUCN). This is included in the recommendations for drafting the new legislation and regulatory texts as part of Activity 1.1.1: <u><i>Legislative and regulatory tools to plan, create, manage and supervise protected areas of the Comoros are updated and consolidated.</i></u></p> <p>The new legislation will provide for other categories of PAs in order to cover all types of protected areas for the country to protect its unique natural and cultural heritage, through the modes of governance relevant to the Comorian context, from strict protection to sustainable use areas.</p> <p>The correspondence between these categories and the categories defined by IUCN will be clearly established, including in national legislation, whose</p>	<p>PRODOC - Annex 5: Development of the legal, policy, institutional and capacity development framework for the new PA system / Output 1.1: <i>PA Legal and Regulatory Framework</i></p>

#	Comments	Responses	Document reference
		<p>drafting will be supported by the project. The lack of correspondence between IUNC PA categories and national PAs is a gap identified already at PIF stage, and which the project will address as part of the package of activities under Output 1.1.</p>	
6	<p>Moreover, under Component 2, management/governance arrangements for the co-managed PAs are well described, but no mention is made on how these will differ in the case of the community reserves. Presumably provisions for the community reserves would include stronger decision-making and land/resource rights for the local communities.</p>	<p>The category of voluntary conservation areas, which includes community reserves, allows taking into account the initiatives of private owners as well as those of local communities. In both cases, these are initiatives undertaken by local communities or private owners, on land, water or other resources owned or controlled by them over the long term. These community reserves or voluntary conservation areas must meet the condition of a voluntary long-term commitment (inherent to the definition provided by the WCPA) based on informed consent of all parties to the objectives of conservation and impose the requirement of a right to long-term occupation.</p> <p>The process of supporting PA establishment, as foreseen in the PRODOC, makes sufficient provisions for consultations, engagement and technical assistance from the project so as to enable the best conditions for community reserves to be established under a devolved governance model. This also includes the drafting of legislation that provides for such models. This gap has been specifically identified and it will be addressed by the project.</p> <p>Refer in particular to the descriptions of Output 2.2 on resource use governance.</p> <p>Else, we expect that the decision-making processes and the negotiations on land/resource rights for the local communities will certainly be different in those sites, when compared with sites under State ownership. These expectations are based on the fact that there are various positive examples from Comoros on how communities with an interest in conservation can take charge of resource use governance and develop, practically on their own, frameworks for making decisions that support a more sustainable management of biological resources at site level.</p>	<p>PRODOC - Annex 5: Development of the legal, policy, institutional and capacity development framework for the new PA system / Output 1.1: <i>PA Legal and Regulatory Framework</i></p>

#	Comments	Responses	Document reference
		<p>We highlight e.g. the Equator Prize winner initiative from Comoros: <a href="http://www.equatorinitiative.org/index.php?option=com_winners&amp;view=winner_detail&amp;id=106&amp;Itemid=683&amp;lang=en">http://www.equatorinitiative.org/index.php?option=com_winners&amp;view=winner_detail&amp;id=106&amp;Itemid=683&amp;lang=en</a></p> <p>We have also observed a similar conservation-friendly attitude at Bimbini Peninsula, Ile aux Tortues, Coelacanth Zone and around the Forest Reserves within Karthala – reason why the establishment of these sites is being supported by the project.</p>	
7	<p>Concerning the co-management approach in the national PAs, it is mentioned that there are several shortcomings in the current approach – it should be mentioned how these will be addressed through the project;</p>	<p>The current situation regarding the co-management approach has been gradually undermined by: i) inadequate communication, ii) insufficient management capacity, iii) inadequate representation of local communities’ priorities and concerns, and iv) evolving roles of the governments at the Union and Island levels. The project has carried out a thorough situation analysis and the project strategy is slated to address these gaps as follows:</p> <p>i) by developing and implementing a strategic communication plan for the PA system (Output 1.2) to communicate the values of biodiversity and PAs, demonstrate that PAs provide benefits beyond their boundaries, foster cooperation and commitment in managing the PA system and develop ownership by all stakeholders, namely local communities, towards protected areas;</p> <p>ii) by developing and implementing a targeted capacity development plan (Output 1.2) to provide adequate training on various aspects of PA management to ensure that all stakeholders of the PA system, namely key members of communities and associations involved in PA collaborative management, are capable of fulfilling their mandate, including co-management committees, PA management units, rangers and ecoguides, environmental and forest brigades, coast guards, and other key actors;</p> <p>iii) by developing a new legislative and regulatory framework (Output 1.1) that will clarify institutional mechanisms and the sharing of powers and responsibilities for the planning, establishment, management and supervision</p>	<p>PRODOC, Section I, Sub-chapters ‘Barrier 1’ and ‘Barrier 2’, under ‘Long Term Solution’</p> <p>PRODOC, - Annex 5: Development of the legal, policy, institutional and capacity development framework for the new PA system / Output 1.1: <i>PA Legal and Regulatory Framework</i> / Output 1.2: <i>Capacity</i> Part I, Section II, Strategy, description of Output 2.2.</p>

#	Comments	Responses	Document reference
		<p>of the overall system of PAs among the national government and its decentralized entities, the new PA agency/office dedicated to the management and supervision of the national PA system, the administrative authorities in charge of autonomous islands (Governors and Commissioners, Mayors), and local communities, organizations and enterprises involved in protected areas.</p> <p>Refer also to the proposed approach for resource use governance enshrined in Output 2.2, whose heading reads as follows:</p> <p><i>Output 2.2 - Resource use governance:</i> Clarity on land tenure for terrestrial PAs and on seascape use-rights for MPAs ensures the ecological integrity of protected sites, with effective mechanisms for mediation and conflict resolution in place and operational in target PAs/MPAs.</p>	
<b><i>France's Comments from November 2012</i></b>			
8	Fostering Union of Comoros' PA system is needed and the rationale of the project is well documented and explained. The problem is that assumptions of the project's feasibility are unrealistic if one looks at the experience of the last 10 years.		
9	The Government was not able to increase budget support to the Park Marin de Mohéli, there is no incentive for the government to increase this amount. At the minimum, such project toward the expansion of the PA system should be based on some proof of improved capacity of management and financing of the existing system which is absolutely not the case in the last 10 years.	<p>UNDP recognizes that approaching the goal of financial sustainability at the PA system level is important, but also that this takes time. More importantly, we recognize that the approach should preferably have a systemic focus. The goals of PA financial sustainability are but a means to end, which is to help sustain a PA system, and the sites that compose it, as functional storehouses of biological diversity.</p> <p>We also highlight that, in the past decade, the conditions for sustaining a PA system in Comoros have not been ideal. In the PRODOC, Part I, Section, Sub-chapter '<u>PA System: Current Status and Coverage</u>' (under 'Context and Global Significance'), we mention:</p> <p style="padding-left: 40px;">“There are several reasons why an expansion of the PAs on Comoros has not occurred until now. First, the Union has experienced prolonged political instability and establishing and managing a network of PAs</p>	<p>PRODOC, description of Output 1.4, and Sustainability and Replicability</p> <p>PRODOC, Part I, Section, Sub-chapter 'PA System: Current Status and Coverage' (under 'Context and Global Significance')</p>



#	Comments	Responses	Document reference
		<p>has not been a high priority for each subsequent government. Secondly, the lack of clarity on the degree of autonomy each island would have has only recently been rectified and although some details are still being worked out in terms of environmental management, the situation is ready for Union-level conservation initiatives. Finally, although the establishment of additional PAs in the country has been planned for many years, there has been a continuous lack of funding – one previous combined proposal to establish a PA network and a trust fund to support its operation was not successful at raising capital and another project to establish a trust fund was also unsuccessful.”</p> <p>At the same time, the project strategy has been carefully designed to maximize the potential for the long-term sustainability of the interventions, both at the level of sites and at the system’s level. It builds on a careful analysis of context, baseline investments and barriers. It draws on best practices in PA management in various fronts, including in PA site level management, PA system capacity building, PA finance, as well as community engagement / co-management and the development of PA co-supportive economic activities.</p> <p>More specifically on financial sustainability, we highlight two important elements that are part the project design:</p> <p>i) The establishment of the Conservation Trust Fund (CTF) in close collaboration with AFD, which in due course and once sufficiently capitalized will provide long-term financing for the protected areas and biodiversity of Comoros. With adequate capitalization, the fund could provide a large percentage of the required funding for the long-term management of the expanded PA network. The CTF is designed to complement government financing and other sources of funds for PAs in the Comoros.</p> <p>ii) The second element that promotes financial sustainability is the design of the PA Authority (Agency/ Office) which will be a part of the government and integrated effectively into the existing Union and island government departments. Though this remains a proposal to be scoped, analyzed and</p>	

#	Comments	Responses	Document reference
		<p>considered during project implementation, the project will seek to encourage the government to expand its contribution to salaries for PA managing staff and operations to show co-financing for the trust fund fundraising efforts.</p> <p>In addition, the project will seek to support sustainable livelihoods development in the communities bordering on the PAs. The strategy chosen for this initiative is to work with existing microfinance institutions and livelihoods programmes to facilitate their access to the communities targeted around the PAs.</p> <p>We believe that the project strategy represents the best bet in terms of Comoros' #1 priority project in GEF5, and hence the best use of GEF Trust Fund resources in this cycle.</p>	
10	<p>The development of tourism in Comoros is not a realistic option to finance a PA system (cf. §22 p 9) and the past years demonstrated that the few backpackers who reach the PMM where not enough and the basic infrastructure and services to bring them to the PMM (irregularity of transport and access infrastructures, lack of information, booking and contact facility, etc) aren't there to create a sufficient flow of visitors and incomes to finance the PMM. At the minimum the PIF should publish and build its strategy on the Tourism statistics and particularly the Tourist entries record at the PMM. This would then bring some relativity to the baseline and the way forward.</p>	<p>A technical document was prepared during the preparation of the project to assess financing needs of the PA system and potential sources of funding including a conservation trust fund. This report examines potential sources of revenues from tourism fees and concludes that they will and not likely to contribute significantly to funding the PA system in the short-term.</p> <p>However, obstacles are identified and proposals are made to raise revenues from entrance and concession fees and to channel such revenues to increase the sustainability of the system.</p> <p>In addition, there are other projects/initiatives and significant financing available to develop and promote ecotourism in and around the future PAs that will complement this project and could result in eventual growth in tourism in the Comoros and for the PAs.</p> <p>Refer also to our thorough response provided further up to GEF Council member USA on a similar question (<a href="#">response #2</a>).</p> <p>Else, the project can set up a system for tracking visiting tourists and profiling their preferences.</p>	<p>PRODOC, Description of Output 2.3</p> <p>Refer also to PRODOC, Section I, Part I, Chapter Baseline Analysis for more information on related initiatives and to Section IV, Part II for an overview of how the project will work with them.</p> <p>Technical document (available upon request)</p>

#	Comments	Responses	Document reference
11	<p>The basic services and infrastructure (water distribution, energy, fisheries licences management or other) are not in place to be able to implement innovative financing solution like Payment for Ecosystem Services.</p>	<p>The project will design and implement a pilot Payment for Ecosystem Services program with a para-statal company <i>Énergie d'Anjouan</i> (EDA). As a pilot, it has a modest and risk adverse scope, which, we believe, is implementable and feasible in Comoros.</p> <p>The project will work with EDA to establish a payment for ecosystem services system to support improved forest and watershed management. EDA manages several small hydroelectric installations in Ndzuani island that provide crucial power resources to the local population. The EDA is interested in developing partnerships that support forest restoration and protection in the key watersheds that feed their power installations.</p> <p>The small scale and the local nature of this PES program will allow the project to explore this mechanism with little risk.</p> <p>All applicable safeguards, including social, environmental, as well as investment-wise, will be applied in the development mentioned PES scheme.</p>	<p>PRODOC, description of Output 1.4</p> <p>Refer to co-financing letter from EDA in PRODOC Section IV, Part I</p> <p>PRODOC Annex 3 for the UNDP Environmental and Social Screening</p>
12	<p>The proposed “Risk management strategy” on the financial sustainability issue2 (a “plan to maintain a financial flow”) does not seem very credible, and past 10 years experience proved to be insufficient to even maintain just the PMM.</p>	<p>We refer to <a href="#">response #9</a> provided further up on this issue (Comoros’ history in the past 10 years has not been conducive to approaches with a long-term view. Yet, there are all indications that this is currently changing for the better, in particular for what protected areas are concerned.</p> <p>We draw the attention to the proposals made under the Output 1.4. More specifically, the project will work closely with AFD and the PMM management to design a Conservation Trust Fund (CTF) based on best practices and past work accomplished in the Comoros. The project will support a national workshop on CTF design and together with co-financing from AFD will sponsor the design and implementation of a fundraising plan to assist the fund with capital acquisition for an endowment.</p>	<p>PRODOC, description of Output 1.4</p> <p>PRODOC Section IV, Part IV, Terms of References for key project staff, sub-heading ‘Chief Technical Adviser’</p>
13	<p>One of the few potentially viable options would be to establish an independent conservation trust fund with a perpetuity endowment to secure the basic operating needs of PA in the country to avoid collapse of investments and give time to development other sources of funding on later stage on the basic but truly operated PA system.</p>	<p>We acknowledge that a CTF with a substantial endowment would be a necessary source of long term financing for the PAs of Comoros until the Union’s economy greatly improves or tourism becomes a significant source of</p>	

#	Comments	Responses	Document reference
		<p>PA entry fees. Reference is made to PRODOC Table 1 on the cost estimates of the system and to the paragraphs that follow it. It has been estimated that a trust fund with a capital endowment of \$30-50 million could finance a substantial percentage of the PA financing needs for the PAs of Comoros indefinitely (PPG study on PA Financing, Meyers 2013). A minimum endowment of \$15 million could possibly sustain between half to one third of the annual costs of the PA system.</p> <p>Furthermore, all of the best practices on PA finance point out to a multi-modal approach. It is not sufficient to focus only on a trust fund or on government investments in the PA system. One needs to focus both on the cost and on the revenue side of the PA financing equation.</p> <p>The setup of the project core team, with a senior Chief Technical Advisor specialist in conservation and PA management, will help create the conditions for this multi-modal approach to produce fruitful results.</p> <p>Altogether, the project will establish an enabling framework for the government, donors, NGOs and the private sector to invest according to a focused and coherent plan to maintain a financial flow that will ensure the viability of the PA system beyond the lifetime of the project (Output 1.4). Besides, the project budget is geared towards sustaining the bulk of the costs of the PA system in the next 4-5 years. After that, it is expected that other financial mechanisms will be in place to sustain, if not all, then the bulk of recurring costs of PA management. These will include other financial mechanisms including increased government operating budgets and a conservation trust fund established through baseline investments.</p> <p>The analysis of PA financing needs carried out at PPG stage has shown that this is feasible. Without reliable revenue streams to PAs, the risk to the sustainability of conservation results would be high. Yet, through the multimodal and system-wide approach to addressing financial sustainability and management capacity deficits, and in combination with baseline investments contributing to sustainability, this risk is mitigated.</p>	

#	Comments	Responses	Document reference
14	In conclusion, this project is urgently needed, but need to be built on realistic option to establish the financial sustainability of the proposed investments.	Refer to responses provided above on the elements of financial sustainability and project strategy.	As above.
15	Opinion: the project needs to be completely redesigned. Moreover, in order to harmonize donors biodiversity protection activities in the country, discussions with the Agence française de développement (AFD) are recommended.	<p>The project document was developed after several meetings and contacts with AFD office based in Moroni and with the consultants based in the Comoros and in France. These meetings harmonized the development and implementation of both projects and have helped avoid duplication of efforts.</p> <p>In Moheli in particular, AFD and UNDP have agreed to harmonize interventions in Mwali Island, merge project teams and integrate work plans, set up one common PSC for both projects and freely share documentation at all levels. This will be quite relevant for Component 2 activities of this project.</p> <p>The AFD project is also supporting the development of the Conservation Trust Fund (CTF) discussed above in support of long term financing of the PMM, which is very much aligned with activities proposed under this project's Output 1.4. AFD is providing co-financing to the project as a token of its engagement and co-support.</p> <p>UNDP has sufficient evidence from AFD to believe that the opinion is currently favorable and that a complete redesign of the project is not needed.</p>	PRODOC, PART III: Stakeholder Involvement Plan and Coordination with other Related Initiatives
<b>GEF Secretariat – Review Sheet dated 15 August 2012</b>			
	<u>Project Design</u>		
16	<i>15. Are the applied methodology and assumptions for the description of the incremental/additional benefits sound and appropriate?</i>	The development of a sustainable livelihoods programme will involve an assessment of previous efforts to develop income generating activities in the project's pilot areas drawing lessons and identifying best practices to come up with realistic recommendations for effective and sustainable options.	PRODOC, description of Output 2.4  PRODOC Part I,

#	Comments	Responses	Document reference
	<p>8-15-12  Yes. For CEO Endorsement, please reconsider how far this project can go with the proposed outputs 2.3 (Tourism) and 2.4 (Livelihoods). Are the "livelihoods programmes" for real? If these "livelihoods programmes" existed for real, isn't like it that the local people would have make use of them already?  .....  a big chance of over committing and under delivering with this output.  Cleared</p>	<p>There are various partners, including within the UN System in Comoros that are making sizable investments in local livelihoods. The UN Resident Coordinator (RC) Office is already ensuring that many of these investments are geared towards the needs of communities living in and around PAs. The RC Office is also reaching out to several other donors and investors with the same aim.</p> <p>We draw the attention as well to the project's baseline analysis, showing how other programmes and initiatives are in many respects already catering for livelihoods aspects of both coastal and forest-dwelling communities.</p> <p>Although local communities are aware of certain livelihood opportunities, they often lack the capacity to assess feasibility, access inputs and microcredit, and require additional technical capacities to implement new activities. The project will work with organizations specializing in microenterprise development to help local communities to identify opportunities and select acceptable and promising projects. Selected projects will be supported by a feasibility study based including potential impact on natural resources.</p> <p>The project will work with local partners to support communities and individuals through: i) technical trainings related to selected activities with a good potential; ii) training on establishment and management of microenterprise and financial education; iii) guidance for the drafting of a business plan and creation of an income generating activity; iv) support for the preparation of dossiers for access to micro-financing; and v) support for the inception and implementation of the activity and vi) follow-up of the microcredit reimbursement.</p> <p>Furthermore, there will also be a concerted approach to mobilizing resources from various sources, including by expanding the donor and partner base that co-support the PA system, and by involving the private sector, where there is scope for it. The setup of the project core team, with a senior Chief Technical Advisor specialist in conservation and PA management, will help create the</p>	<p>Section I, Chapter Baseline Analysis PRODOC Section IV, Part IV, Terms of References for key project staff, sub-heading 'Chief Technical Adviser'</p>

#	Comments	Responses	Document reference
		conditions to make this happen.	
	<u>Recommendation at PIF Stage</u>		
17	<p>31. <i>Items to consider at CEO endorsement/approval.</i> 8-15-12</p> <p>For CEO Endorsement, please seriously reconsider using sea turtles and coelacanth as indicator species. That will consume significant resources and not necessarily yield the expected results. Please refer to the GEF learning Mission reports for Zambia and India for suggestions.</p>	<p>We agree that monitoring coelacanth and sea turtles is technically challenging and would impose an excessive financial burden on the project. The project will no longer target coelacanth for impact monitoring. The project will support monitoring of turtle nesting tracks and successful nesting attempts as this can be achieved following a very simple protocol that has been ongoing for several years in several beaches of the Moheli Marine Park. It is proposed to monitor turtle nesting tracks and successful nesting attempts in all beaches of the new and existing MPAs where turtle tracks have been observed, including the beaches of the PMM, Bimbini, Chindini, and Turtle Island.</p> <p>Else, we have consulted the Zambia and India mission reports (from GEF learning mission) and we will follow what they suggest with respect to indicator species.</p>	<p>PRODOC - PART I - SECTION II: Indicator framework as part of the SRF</p>
18	All other comments addressed as per this matrix.	See above	As above

#	Comments	Responses	Document reference
	<b>STAP– Review Sheet dated October 12, 2012</b>		
19	Based on this PIF screening, STAP’s advisory response to the GEF Secretariat and GEF Agency(ies): Consent		
20	<p>... provision of alternative livelihoods/incomes for communities surrounding PAs is of paramount importance to assure effective PAs management. While these activities are largely beyond scope of the proposed project (only listed as Output 2.4), STAP recommends project proponents to develop gap analysis and establish appropriate formal and informal partnership arrangements with stakeholders to enhance income activities diverting local communities from unsustainable use of forest resources and fishery resources in areas surrounding PAs.</p>	<p>The GEF project’s role in such programmes will be catalytic vis-à-vis other partners, given that several existing initiatives are already working on livelihoods themes including community based ecotourism. See above responses.</p>	<p>PRODOC, description of Output 2.4</p>



Responses to GEF Secretariat Review for FSP dated 25 Jun 2014

<b>GEF ID:</b>	5062		
<b>Country/Region:</b>	Comoros		
<b>Project Title:</b>	Development of a National Network of Terrestrial and Marine Protected Areas Representative of the Comoros Unique Natural Heritage and Co-managed With Local Village Communities		
<b>GEF Agency:</b>	UNDP	<b>GEF Agency Project ID:</b>	4950 (UNDP)
<b>Type of Trust Fund:</b>	GEF Trust Fund	<b>GEF Focal Area (s):</b>	Biodiversity

**First Review**

<b>Review Criteria</b> <b>GEF Secretariat's Comments</b> (Received on 27-Jun-2014)	<b>UNDP's Response</b> Jul 15, 2014	<b>Document Reference</b>
<b>Project Financing</b>		
<p>25. At PIF: comment on the indicated co-financing; At CEO endorsement: indicate if confirmed co-financing is provided.</p> <p>6-23-14 The LoC from NGO Ulanga Ngazidja does not state the amount of co- financing (\$328,000). Please obtain a new letter or remove this source as co- financing, recalculate total co-financing and resubmit. Thanks.</p>	<p>UNDP has reviewed the set of co-financing letters and the letter from NGO Ulanga Ngazidja, dated 04 April 2014, in particular.</p> <p>We have identified that the problem seemed to have been in the brevity of the translation attached to the letter.</p> <p>In fact, the letter from NGO Ulanga Ngazidja in French mentions an amount of 240,000 EUR written out in full (rather than in figures) as their co-financing to the project. The last bit of the last phrase of paragraph 1 reads as follows: “[...] à hauteur de deux cent quarante mille Euro”.</p> <p>In the previous iteration, the translation showed this amount in numbers but as “280,000 EUR”, which was incorrect.</p> <p>However, the conversion into USD was correctly done in the overview. As with the other letters in EUR, the UN exchange rate for June 2014 of 1.37 was applied to EUR 240,000, obtaining a total of USD 328,800 for the mentioned letter – the exact amount used in all</p>	<p>ANNEXURE to the PRODOC - LETTERS OF CO-FINANCING, English version, - Page 2, note 3 - Page 42, translation to the letter from NGO Ulanga Ngazidja</p> <p>UNDP PRODOC, Section IV, Part 1, page 108, [Overview of] Letters of co-financing commitment, note 3</p>

<b>Review Criteria</b> <b>GEF Secretariat's Comments</b> (Received on 27-Jun-2014)	<b>UNDP's Response</b> Jul 15, 2014	<b>Document Reference</b>
	<p>calculations.</p> <p>We have made the necessary corrections to the document containing the letters and to the applicable page in the PRODOC.</p> <p>No amounts have changed in the CEO Endorsement Request, as a result of these corrections. The letter remains as part of the co-financing to the project.</p>	
<b>Recommendation at CEO Endorsement / Approval</b>		
<p>33. <i>Is CEO endorsement/approval being recommended?</i></p> <p>33. Is CEO endorsement/approval being recommended?</p>	<p>All comments addressed and changes highlighted.</p> <p>We took the opportunity of this resubmission to make one more correction to the PRODOC, namely that Annex 1 was misplaced in the text flow. It is now in the correct place on page 109.</p>	<p>As above</p> <p>PRODOC Annex 1, page 109</p>

### Second Review

<b>Review Criteria</b> <b>GEF Secretariat's Comments</b> (Received by mail on 08-Aug-2014)	<b>UNDP's Response</b> Aug 10, 2014	<b>Document Reference</b>
<b>Project Financing</b>		
<p>08-08-14</p> <p>Note on discrepancy in co-financing overview between PRODOC and CEO Endorsement</p>	<p>UNDP apologises for the typo (or pasting mistake) in the co-financing overview. The amount offered by UNDP Moroni to the project, as it appeared in the PRODOC page and the PDF file containing letters of endorsement, is actually \$500,000 as per letter dated 02 May 2014, which was already included in the submission documentation. The total co-financing was otherwise correct and remains unaltered.</p> <p>The co-financing overview in the CEO Endorsement Request was correct. The document is re-submitted with only the date stamp changed.</p>	<p>ANNEXURE to the PRODOC - LETTERS OF CO-FINANCING, English version, Page 2, UNDP amount</p> <p>UNDP PRODOC, Section IV, Part 1, page 93, [Overview of]</p>

<b>Review Criteria</b> <b>GEF Secretariat's Comments</b> (Received by mail on 08-Aug-2014)	<b>UNDP's Response</b> Aug 10, 2014	<b>Document Reference</b>
	PRODOC and Letters of co-financing Annexure are hereby re-submitted with applicable changes highlighted.	Letters of co-financing commitment

**ANNEX C: STATUS OF IMPLEMENTATION OF PROJECT PREPARATION ACTIVITIES AND THE USE OF F****Detailed funding amount of ppg activities and financing status**

PPG Grant Approved at PIF: n/a
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<i>Project Preparation Activities Implemented</i>	<i>GEF/LDCF/SCCF/NPIF Amount (\$)</i>		
	<i>Budgeted Amount</i>	<i>Amount Spent To date</i>	<i>Amount Committed</i>
1. Project scope and strategy defined, and GEF full proposal documentation prepared and approved	99,440.00	90,381.96	9,058.04
<b>Grand Total</b>	99,440.00	90,381.96	9,058.04

PPG activities achieved all of their goals (See PRODOC Annex 7). Funding is being reserved for translation into French after approval and final appraisal of the PRODOC prior to signature.

**ANNEX D: CALENDAR OF EXPECTED REFLOWS (IF NON-GRANT INSTRUMENT IS USED)**

n/a